

For general release

REPORT TO:	Streets, Environment and Homes Scrutiny Sub-Committee 23 January 2018
SUBJECT:	Evolution of the Suburbs Supplementary Planning Document
LEAD OFFICER:	Steve Dennington, Head of Spatial Planning
CABINET MEMBER:	Councillor Alison Butler, Deputy Leader (Statutory) and Cabinet Member for Homes, Regeneration & Planning
PERSON LEADING AT SCRUTINY COMMITTEE MEETING:	Steve Dennington (Head of Spatial Planning) Guy Rochez (Place Making Project Officer) Claire Hayward (Plan Making Project Officer)

ORIGIN OF ITEM:	This item has been identified by Streets, Environment and Homes Scrutiny Sub-Committee as an item of scrutiny.
BRIEF FOR THE COMMITTEE:	To consider sustainable growth in the suburbs.

1. EXECUTIVE SUMMARY

- 1.1 The emerging Local Plan contains policies and designations that facilitate sustainable growth within the suburbs and refer to supplementary guidance (in the form of a Supplementary Planning Document (SPD)) to steer this. It is expected that the new Supplementary Planning Document 2 will supplement the design policies set out in DM11 of emerging Croydon Local Plan: Detailed Policies and Proposals (CLP2).
- 1.2 It is proposed that this guide will not only update and replace the existing SPD2 (Residential Extensions and Alterations) but also provide guidance for small-medium sized residential developments including the subdivision of larger properties, infill development and the development of the largest back gardens in the borough. Furthermore, guidance will be provided for the Intensification Areas identified in the emerging Local Plan where development is expected to contribute to an increase in density and a gradual change in character.
- 1.3 The draft London Plan (published 1st December 2017) has set significantly increased housing targets for London and Croydon. It is proposed that a significant number of these homes across London will be accommodated through the sustainable growth of the suburbs. There is a need to ensure this pressure on delivering housing within the suburbs and outer London is steered

with design guidance to ensure new homes are integrated with the existing fabric of the Borough and accommodated in a sustainable manner.

- 1.4 Currently there is a lack of design guidance for the different types of suburban development and how they contribute to a holistic vision for the sustainable growth of the suburbs. As such some developments coming forward do not reach their full potential in this respect. It is proposed that the new SPD2 will provide clear design guidance for developments across Croydon's 16 Places (as identified in the Local Plan) that will contribute towards the sustainable growth of the suburbs, intensification and focused intensification areas to help ensure that such growth occurs in the most sustainable way and to the best possible design standards to ensure any impact is mitigated, in the context of the emerging policies set out in the Local Plan. The guidance will provide certainty to locals, developers and other stakeholders as to what kind of growth is anticipated, and ensure the Local Planning Authority are making decisions on proposals based on such guidance, rather than other means or even being hostage to planning by appeal.
- 1.5 The existing SPD2 (Residential Extensions & Alteration) was produced over a decade ago and needs to be replaced to reflect experience of applying the guidance, appeal decisions over the years, new legislation, the changing policy context and policy objectives in Croydon. Pertinent to this is the introduction of Permitted Development rights which give homeowners significant development rights to extend and alter their homes. It is expected that the new SPD2 will respond to this and consider how Permitted Development as well as planning approved extension and alterations may accommodate growth.
- 1.6 The new SPD2 is expected to provide certainty to developers, communities and stakeholders regarding what is anticipated to be the output of sustainable growth of the suburbs, intensification and focused intensification areas – 'what it will look like'. It will have weight in planning decisions as a material consideration, giving planning officers guidance as to what kind of growth could be appropriate, helping ensure that projects and developments delivered in the Borough are of the highest design quality, contribute towards the strategic vision of its Place and mitigate impact to ensure sustainable growth of the suburbs.
- 1.7 The proposed structure of the new SPD2 is set out in Appendix A. The scope of the guidance covers three key subject areas: Residential Alterations & Extensions, (Re)Developments & Intensification Areas. It is considered that each of these subjects will be the basis for individual components that form part of a suite documents, accompanied by a master document setting out the overall purpose and importance of the guidance. References in terms of guidance, structure and visual communication are provided in Appendix B.
- 1.8 The scope of SPD2 has been refined through a series of informal evidence gathering workshops with internal and external stakeholders over the past two months. This has included meetings with Spatial Planning, Development Management, Public Health, Regeneration, BrickXBrick, Strategic Transport, GLA, DK-CM, HTA, Croydon's Place Review Panel and local developers. These workshops have informed the issues detailed in the following pages. Following the review of these issues by Scrutiny, it is expected that the new SPD2 will be drafted in earnest with engagement with Residents' Associations and Planning

Committee Members, along with the stakeholders already consulted, in February – March 2018. More detail on the timeline is provided under 2.4.1.

1.9 It is expected that the issues detailed will form part of the evidence base for the new SPD2 as it is drafted. The project team would appreciate and value Scrutiny's view on the issues below, but with particular concern to the following strategic issues:

- Does the proposed scope of the new SPD2 cover the key issues for ensuring sustainable growth is delivered for all stakeholders? Should SPD2 provide a strategic long-term vision for the suburbs?
- Should such a vision give detail to how good growth can accommodate greater densities to ensure we deliver the housing required whilst mitigating associated impacts?
- Should such a vision propose a holistic approach to growth, incorporating issues such as transport and waste management?
- Are there further issues that Scrutiny advise the project team to investigate?
- Are there other stakeholders that the project team should consult?
- Does Scrutiny have any recommendations on the form of future consultation with the differing stakeholders?

2. Evolution of the Suburbs SPD – Scrutiny Report

2.1 Residential Extensions & Alterations

2.1.1 The guidance for Residential Extensions & Alterations (REA) is considered to form part of the vision for sustainable growth of the suburbs. Existing houses present opportunities to accommodate growth in terms of physical space, number of habitants and households. As such revised guidance on REA will form an integral part of the new SPD2.

2.1.2 Current Permitted Development (PD) legislation as part of the General Permitted Development Order (2015) gives homeowners considerable rights to extend and alter their homes without seeking planning permission. Thus a lot of extensions and alterations are beyond planning control. The existing SPD2 on Residential Extensions & Alterations was adopted in 2006, well before Permitted Development rights were legislated. As such the existing SPD2 does not reflect the scope of PD rights and is undermined by it in many respects. A comparison between the existing SPD2 guidance and PD rights is included in Appendix C. An approach to PD is considered to be important in producing meaningful and useful guidance on Residential Extensions & Alterations. This is likely to follow guidance that could be considered to be 'Permitted Development Plus'. Such guidance would be consistent with Permitted Development and provide additional guidance for extensions & alterations that go beyond PD rights. The guidance could also provide design advice for proposals that are PD, as well as schemes that require planning permission. As such this would encourage homeowners to approach extensions and alterations through PD with the same conscience to design as those applying for planning permission.

2.2 (Re)Development

2.2.1 There is need for guidance on the types of developments listed in Table 46.3 of the emerging CLP2 (included in Appendix D). Those relevant to the development of existing plots and homes are as follows:

- In-fill including plot subdivision: Filling in gaps and left over spaces between existing properties. It can also include subdivision of large plots of land into smaller parcels of land with a layout that complements the existing urban pattern.
- Rear garden development: The construction of new buildings in rear gardens of the existing properties. Houses must be subservient in scale to the main house.
- Regeneration: The replacement of the existing buildings (including the replacement of detached or semi-detached houses with flats) with a development that increases the density and massing, within the broad parameters of the existing local character reflected in the form of buildings and street scene in particular.

2.2.2 These forms of development are already common to Croydon and they continue to come forward for planning permission in great quantity. They form an integral aspect for the growth of the suburbs and as such guidance for them will be provided within the (Re)Development section of the new SPD2.

2.2.3 The quality of schemes for such small - medium scale developments varies greatly, and there is currently no collective vision for how developments may work together in an integrated manner, taking into consideration issues such as transport, parking, servicing and refuse collection, to deliver sustainable growth. As such there is scope for design guidance related to these types of development, as well as strategic vision for how developments can collectively contribute to the sustainable growth of the borough.

2.3 Intensification Areas

2.3.1 The emerging CLP2, pending the Inspector's report, identifies four intensification areas. These areas are currently defined as:

- Area around Kenley station
- Brighton Road (Sanderstead Road) Local Centre with its setting
- Around Forestdale Neighbourhood Centre
- Settings of Shirley Local Centre and Shirley Road Neighbourhood Centre

2.3.2 These areas have been identified due to their capacity to accommodate sustainable growth. They have good transport and other infrastructure provisions, including local amenities such as shops, but with comparatively low densities along with site opportunities for development. This capacity for growth in sustainable locations gives them importance as an integral aspect of the vision for the suburbs that design guidance within the new SPD2 is proposed to provide. It is expected that guidance for growth in these areas will need to be tailored to the specificity of each area.

2.4 Suburban Evolution – General Issues & Options

2.4.1 The issues tabled in the paragraphs below have a bearing on the different forms

of Suburban development described above. These issues should be considered in light of REA, (Re)Developments and the Intensification Areas as appropriate. The project team would welcome Scrutiny's response to these issues and comment on whether there are others that should be investigated.

2.4.2 Plot Widths

The character of streets across the borough are underpinned by the development patterns identified in the borough's Character Appraisal. These patterns are defined as much by the width of plots and the spaces between the buildings, as by the buildings themselves. It is considered that guidance within the new SPD2 should recognise the importance of working with the rhythm of the built form as an integral aspect to character. Such guidance would have a bearing on gaps between terraces, spaces between semi-detached houses and distances from boundaries in detached properties.

2.4.3 New Routes

Backland developments can present an opportunity to connect existing streets within the borough, providing new routes through neighbourhood blocks. This can be used advantageously in providing natural surveillance and embedding new development within the life of the existing community. To ensure developers think about how their proposals are part of the local context, it is considered that there is a need for guidance that exemplifies how developments may be planned to accommodate such routes.

2.4.4 Neighbouring Sites

It is not unusual for backland and smaller sites that come forward for development to sit alongside other sites with development potential that are under separation ownership. There is often greater development potential when adjoining sites come forward together and this can provide the opportunity to create more successful pieces of suburbia, rather than piecemeal development. It is considered that the new SPD2 should provide guidance on working with neighbouring sites and how to ensure future developments on adjoining sites are not sterilised by development on one site coming forward first.

2.4.5 Transport & Parking

Access to transport and parking provision are related issues when considering the development of suburban sites. The need for parking provision is determined by the sustainable transport accessible from the site (including walking and cycling, as well as bus routes and train services). As the Places of Croydon accommodate more growth the need for parking provision increases where there is a lack of accessibility to sustainable transport. It is a key development concern and often a key issue amongst residents. There are a number of approaches to transport and parking provision that can be considered alongside one another in relation to sustainable suburban growth that will be investigated as the guidance as SPD2 is drafted.

The suburbs are inherently car orientated places, however the Mayor's Transport Strategy and the draft London Plan are clear on the expectation that London's

future is increasingly car free. To encourage car free developments within the suburbs, there is need to provide more public transport provision. As the guidance is drafted it is expected that the project team will continue to consult with the Council's Strategic Transport Service and Transport for London to assess how sustainable growth of the suburbs can be tied into increased provision and new forms of public transport given the prospect of increased patronage. This may include neighbourhood trials on schemes such as on-demand bus services, e-bikes and increased cycle storage in key locations.

There are a number of different tools for assessing access to transport. The most common is PTAL, however it is recognised that this is a relatively blunt instrument. The new SPD2 presents the opportunity to investigate how alternative measures may guide the siting of developments and the associated quantum of parking provision.

Provision of parking can lead to the loss of landscaping, amenity space or green space, particularly in redevelopment of existing single family households into multiple residences where gardens are paved over to provide parking. The new SPD2 presents the opportunity to provide guidance on appropriate landscaping arrangements to ensure green space is maximised in such developments.

2.4.6 Housing Mix

The Croydon Local Plan & London Plan provide guidance on housing mix but this can be challenging to apply without precluding development on certain sites, particularly on smaller sites. SPD2 provides the opportunity to emphasise the importance of housing mix to developers and provide residents with reassurance that the Borough is proactively responding to local housing needs.

2.4.7 Under-development

The Council receives a significant number of suburban development proposals for 9 or less units, which avoid the need for affordable housing provision (the policy threshold for affordable housing is set at 10 units). As such development potential often is not maximised on some sites. It is expected that there will need to be some guidance on the expected capacity of sites of a certain size or type, and on subdivision to reduce the size of a site to ensure existing sites maximise their potential and deliver affordable housing where possible. The project team recognise that strict guidance on maximising the potential of sites could deter developers from Croydon and impact on the quantum of all housing delivered. This will need to be carefully considered within the guidance.

2.4.8 Overlooking Distances

All scales of suburban growth from REAs to larger developments within the Intensification Areas will need to demonstrate a reasonable approach to how overlooking to and from neighbouring properties is managed. Overlooking can be a particular issue in tight backland developments or where extensions or development on undeveloped land occurs in close proximity to existing residences. As the suburbs accommodate growth with greater densities of development, there is need for greater guidance than provided in the emerging Local Plan that sets out an approach to this.

2.4.9 Building along & up to boundaries

Developments that extend along the boundary of neighbouring properties can impact on the daylight / sunlight, views and potential for future development on neighbouring sites. It is considered that there is a need for guidance on scale and design of development that directly adjoins boundaries, but does not limit development along boundaries by being too numerically specific.

2.4.10 Daylight and Sunlight

There is a need for all developments to not cause undue harm to access to light for future and existing residents. Technical guidance / measurement for daylight and sunlight impacts provide one method for determining the success of a proposal. While interpretation and application of sunlight / daylight standards is important, there is the risk that this reduces the potential to accommodate quantum of development that would be acceptable in more urban conditions and as the suburbs evolve may become more appropriate. It is expected that guidance on daylight and sunlight will be provided within the new SPD2.

2.4.11 Sense of Arrival

New developments, notably on backlands which are typically accessed via narrow lanes alongside existing properties, usually require some kind of new entrance. To integrate them into the existing urban fabric there is a need to mark their entrance in a way that corresponds to the scale of the existing and the new, without compromising the safety and security. Generally gated communities are considered to have negative impacts on the vitality of local communities. Guidance within the new SPD2 will seek to address methods for creating effective entrances to new small – medium sized developments.

2.4.12 Access to sites

The narrow lanes typically used to access backland sites present a range of servicing difficulties, from day to day issues like waste collection, through to access for emergency vehicles. Poorly accessed sites can make developments unviable without the correct technical approach to alternative design solutions. These approaches need to be considered as part of the planning process to avoid repeat applications due to changes in proposals as a result of these issues emerging post-planning. These issues frequently require coordination between developers, Council and stakeholders to ensure they are well designed and do not undermine Building Control regulations. Guidance on such matters will be provided within the new SPD2.

2.4.13 Place-specific guidance

The Places, local areas and individual streets of Croydon have specific characteristics as a result of the patterns of developments that have occurred there. Different approaches to suburban development will have differing impacts depending on the place. The new SPD2 needs to take an approach to character which defines where it is appropriate for character to be maintained and where it is expected that there will be a positive evolution of character, or gradual change

for the Intensification Areas. Attempting to be overly place-specific risks creating an excessive amount of guidance as that limits flexibility in applications and stifles good design and innovation. However, without guidance, future developments may fail to respond to place-specific characteristics throughout the borough. The new SPD2 is expected to build up guidance based on the Borough's Character Appraisal, thus providing an approach to place-specific guidance.

2.4.14 Character

The Borough's Character Appraisal provides technical evidence on the typological characters of different forms of development across Croydon. Most prominent are Victorian terraces, 20th Century semi-detached homes and mixed aged detached houses. Each pattern of development, both in terms of townscape and architectural detail, contributes to the feel of the area. Guidance within the new SPD2 will be provided on how to positively respond to character. This will reduce the need for small developers or home owners to undertake a full contextual analysis and thus make the planning process for smaller projects easier to navigate.

2.4.15 Shallow Architecture

A considerable number of suburban residential developments come forward with designs that reflect neighbouring developments. This typically is embodied in a mock-Georgian, mock-Victorian or occasionally mock-Tudor drawn external appearance, however the reality of built-quality and the success of replicated detailing is often limited. The new SPD2 must consider how contemporary and innovative design, as well as traditional design, can be encouraged and delivered to a high quality.

2.4.16 Conservation Areas

Croydon has a total of 21 Conservation Areas, all with specific guidance. The majority of these areas are suburban in their character. Whilst the development potential within Conservation Areas is limited so as to conserve the character of the area, they still present some opportunities for appropriate growth. Whilst guidance in the new SPD2 may be applicable to projects in Conservation Areas, it must avoid contradiction or overlap with Conservation Area guidance which will hold more weight in planning decisions for these areas.

2.4.17 Pattern Book

To respond to the difficulty of small scale developers / homeowners having limited resources to carry out contextual analysis and invest in expensive design processes, Council officers and the Place Review Panel believe that the new SPD could provide a pattern book for common REA and developments to ensure a level of quality is locked into all proposals coming forward. Such pattern book would provide a baseline for these types of proposals, however there is a risk that any prescribed style could make the design process onerous and increase construction costs, thus limiting viability. Any such pattern book guidance would need to be technical rather than aesthetic.

2.4.18 Prefabrication

Prefabrication techniques are increasingly common at all scales within the construction industry. Buildability on small sites is challenging and disruptive to local communities. It is considered that SPD2 should be approached with an understanding to off-site manufacture and how it may be exploited to contribute to the sustainable growth of the suburbs.

2.4.19 Subservience

Commonly supplementary planning guidance in the UK on extensions and developments within the curtilage of an existing property require proposals to be 'subservient'. If poorly defined this can both limit the potential of sites in accommodating a greater quantum of development and prejudice good contemporary design not considered to be subservient. DM11 of the emerging Local Plan is clear that subservience is applicable in terms of the scale of developments in the grounds of an existing house, but does not give any further constraints or its applicability to design. The new SPD2 provides the scope to test the applicability of subservience in other scenarios and in terms of design.

2.4.20 Visible Ancillary Items

Additional items related to the servicing of buildings can become a detractor from the appearance of a development and have a negative impact on the street scene. It is considered that there is a need for guidance on common items such as flues, ducts, vents, antennas, signage and refuse stores, to ensure these are designed into proposals and avoid clumsy addition of such items.

2.4.21 Landscaping & Topography

Croydon is an inherently green borough. Managing the impact of suburban redevelopments on the appearance of neighbourhoods to ensure green space and vegetation is not lost is an important aspect in defining an approach to character and as conveyed in Local Plan policy. Equally the topography of Croydon presents opportunities that can be exploited to maximise the potential of a site to accommodate development, integrate ancillary spaces and minimise impact on the surrounding area. It is expected that guidance within the new SPD2 will encourage this.

2.5 Timeline & Future Engagement

2.5.1 Timeline

The following dates set out the proposed timeline for drafting and adopting the new SPD2:

Oct – Dec 2017: Stakeholder workshops

Jan 2018: Scrutiny

Jan - Feb 2018: Evidence assembly, early engagement and issues and options identification

March 2018: Informal workshops on issues and options

April - June: Revisions & development of guidance

July - August: Formal consultation on draft SPD in accordance with the relevant regulations and the Council's Statement of Community Involvement

September 2018: Consideration of representations and post-consultation amendments

October 2018: Adoption

2.5.2 Residents Associations & Planning Committee

Residents' Associations and the Planning Committee Members have been written to informing them that the SPD is being considered by this Scrutiny meeting. This provides the opportunity for early insight prior to detailed engagement.

Following draft guidance on the issues and options, they will be engaged in informal workshops in early March. They will be engaged formally once the final draft is published in July.

2.5.3 Design Workshops

To test the draft issues and options, a series of design workshops will be held in the spring of 2018, with the following stakeholders:

- Spatial Planning, Development Management, Strategic Transport, Streets & Districts and Regeneration
- HTA Architects & DK-CM
- Place Review Panel
- Local Developers / Agents & Brick by Brick
- GLA Regen & GLA Strategic Planning
- Residents' Associations
- Planning Committee Members

The design workshops will include testing the draft guidance through a series of devised scenarios at a range of scales to test the aspects of the new SPD2 from the scale of designing a dormer window through to proposing a series of developments that fulfil the proposed strategies for the identified intensification areas.

2.5.4 Formal Consultation

The draft new SPD2 will also be available during the period of formal consultation (expected to be summer 2018). This will be through the normal channels including documents being available on the Council's website and at libraries.

2.5.5 Discreet Packages of Work

There are a number of emerging tasks which could in themselves become

discreet packages of work. This work builds on the Local Plan evidence, most notably the borough character appraisal and typological work. These elements of work are set out below in relation to the relevant section of the new SPD that they would inform. It is the intention of the Spatial Planning Service that these elements will be undertaken in-house, however they could present opportunities for external input.

Masterplanning of Intensification Areas:

- Outline proposed massing, establishing building heights & lines
- Proposed uses
- Indicative visualisation of masterplans

Evolution of the Suburbs:

- Pattern book plans for converting single-family homes into multi-family developments: terrace, semi-detached & detached homes (extensions & subdivision). These plans would demonstrate typical ways in which these homes could accommodate development.
- Pattern book designs for curtilage houses
- Pattern book designs for garage conversions

Residential Extensions & Alterations:

- Pattern book plans for extending single-family homes: terrace, semi-detached & detached homes (dormers, roof, additional storeys, side, rear, wrap-around). These plans would demonstrate typical ways in which these homes could be extended or altered.

2.5.6 Pilot Schemes

To fully test the guidance and provide best practice references the project team are exploring the potential for pilot schemes. This is both in design and delivery.

In the context of design, there is potential to set the PRP panelists longer design tasks based on typical scenarios and ask them to use the guidance to produce proposals. This would be full pilot test runs of the guidance.

In the context of delivery, there is potential to work with Brick by Brick (BxB), or other local developers, to realise the guidance to its fullest. To an extent BxB already provide for exemplar reference, but the schemes that have already come forward are not a response to the guidance, but rather a result of their investment in design. Future schemes present the opportunity to provide responsive examples of 'what it will look like' for all those involved in suburban development.

CONTACT OFFICER: Guy Rochez, Place Making Project Officer

BACKGROUND DOCUMENTS: None

Appendices

Appendix A: Proposed Structure

Appendix B: Language & Graphic

Appendix C: Existing SPD2 / PD
Appendix D: Table 46.3 (from CLP2)