

**Draft Supplementary Planning Document (SPD) for
Public Consultation in September - October 2018**

**by the
London Borough of Croydon**

**These comments on the draft document
are submitted by the Committee of
Riddlesdown Residents' Association**

**11 October 2018
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DRAFT SUBURBAN DESIGN GUIDANCE

The comments below are submitted by the committee of the Riddlesdown Residents' Association (RRA). The RRA area is roughly an area equal, partly within the Council Wards of Purley Oaks and Riddlesdown, and also the Sanderstead Ward. We represent 1,400 households living mainly in pre-war residential estates, built by John Laing's.

There is much in the draft suburban design guide (SPD2) that we commend, and hope that it will have a positive impact upon the quality of new housing in suburban areas such as Riddlesdown. In particular, the sections on materials and external appearance are well considered, and clearly expressed in terms of their requirements. Similarly, the sections on site layout and servicing are well thought through in terms of connecting new development to established residential areas.

As the Council will be aware, Riddlesdown has seen a number of poorly thought through and designed schemes coming forward over the past 18 months or so. These schemes often lack accurate information in the accompanying Planning Design and Access Statements submitted by applicants. Frequently, they advocate over intensification of development. They also lack a design-led approach, and make minimal attempts to form a positive relationship with the surrounding residential environment and street scene. Although many of these schemes conform to the policies described in the Croydon Local Plan (CLP) 2018, the RRA believe that, once developed, they will have a negative impact upon Riddlesdown's existing residential design and quality.

Set against this context, we have four key concerns regarding the draft guide:

i) whilst we accept that the parameters of the design guide are established through the CLP 2018, we think that one element of both needs to be revisited: the concept of the 'evolution' of the suburbs. Both the video accompanying the design guide, and the latter's content, imply that the policy approach is about maintaining the rate of evolution of development in suburban areas.

However, the proposed delivery of 10,000 new homes in suburban areas of Croydon (or 500 new homes per annum) does not reflect 'evolution' when compared to recent housebuilding trends in suburban areas of the borough. For this reason, we disagree with para 1.3.1 (page 6) which states that *'the process of the suburban evolution indicated is expected over a period of 10 - 15 years, so that change is gradual, and can be managed to ensure that the benefits of such growth are optimised.'* The RRA believe that developing this many houses in a period of 10 to 15 years does not represent gradual change in planning terms, particularly given the quantum of housing proposed.

We believe that it would help to create a better understanding of the change proposed in suburban areas, and engender more trust with local communities, if the Council were to describe more accurately the scale of change proposed in suburban areas. For example, we estimate that the current suburban housing target will require one new home for every 5 existing dwellings. In addition, we would suggest replacing 'evolution' with a more accurate descriptor like 'intensification' or 'rejuvenation' of the suburbs.

ii) linked to i), it is absolutely **critical** that the Council make clear what additional physical and social infrastructure is required to ensure that the additional housing growth is accommodated in a sustainable manner, which results in the rejuvenation of suburban

areas like Riddlesdown. Linked to this, the Council must clarify how this infrastructure will be provided: what is the timescale for delivery and what is the source of funding?

The RRA held a public planning workshop in July 2017. Approximately 50 local residents attended, and whilst all the comments made are relevant to the draft design guide, the clear overriding feedback we received was that any new housing needs to be accompanied by additional infrastructure in terms of public transport, schools, health services, adequate car parking, public realm improvements and drainage (to address flooding concerns).

In our planning objections to many recent housing schemes in Riddlesdown, the RRA have repeatedly stressed the need for accompanying physical and social infrastructure. In particular, we have consistently flagged our concerns about the lack of consideration of the cumulative impact; in environmental, social and physical terms - of the six recent schemes (flats and houses) on Riddlesdown Road. We remain concerned that flooding (including surface run-off) and the lack of an appropriate access road to these schemes have not been adequately addressed by the Council.

If the Council want to get local communities to buy into suburban growth, it is absolutely critical that they clearly identify what new physical and social infrastructure will be provided, and how this will improve public services, such as healthcare, public transport, and community facilities. It is not good enough to say that the Council will 'work with utilities and service providers', as currently stated in this draft guide. Until the issue of additional infrastructure and public services is addressed in a transparent costed manner, communities like Riddlesdown will remain sceptical about the Council's real ambitions for the suburbs.

iii) notwithstanding the above, we recognise that meeting housing need may become more challenging if the proposed housing target for Croydon is adopted in the emerging London Plan. Set against this, the 2017 mid-year estimates show a slowing rate of population growth across London. For this reason, we believe that new housing should be phased sustainably over the period of the CLP. We suggest that over the first five years of the CLP, the Council identifies the suburban areas that can most easily accommodate new development.

iv) key to the success of this design guide is that developers work within its guidelines with immediate effect. For many developers, particularly those who have been bringing forward schemes in Riddlesdown over the last 18 months, this will require a significant change in their working culture and housing development model. We do not believe that the guide in itself is sufficient to engender this change. We believe that the Council needs to develop an implementation strategy which demonstrates how they will pro-actively work with developers in suburban areas to ensure that this guidance is quickly embedded into their working practices, resulting in design-led schemes of an appropriate size, scale and massing, which both maintain and improve residential quality. This strategy should include some form of penalty to be imposed on developers if they continue to bring forward schemes which do not meet these requirements.

The RRA (and other local southern RAs) would be happy to work with the Council to address the points raised above, and the detailed comments are in the attached Annex A.

Annex A: Detailed Comments on the Draft Suburban Design Guide

Chapter 1

- Para 1.1.4 (page 2) states that the increased density of homes can impact on the amenity of existing residents if not properly managed. The *'guide provides technical design guidance that seeks to both limit any negative impact on places, including the amenity of existing residents, and frame opportunities where increased densities can present significant opportunities to enhance places and bring benefits to communities'*. Surely the ambition should be to *'maintain and improve residential quality in suburban areas'*; and to ensure that any negative impacts are minimised; otherwise new development should not be allowed?
- Figure 1.2a (page 3) – what exactly are the planning benefits of the 'after' scenario, other than an increase in housing numbers in the area? The intensified level of development would lead to more on-street car parking. How exactly would the likely increased surface run-off be addressed, and where are the improved public services that this level of development is expected to realise?
- Figure 1.2b (page 4) – as with Figure 1.2a, the intensified level of development would lead to more on street car parking. How exactly would the likely increased surface run-off be addressed, and where are the improved public services that this level of development is expected to realise? There is also existing legislation that makes parking on the highway an offence of obstruction, unless it is in a marked parking bay. Why are the Council therefore encouraging residents to park on the highway?
- Para 1.2.2 (page 5) - how exactly would the likely increased surface water run-off be addressed, and where are the improved public services that this level of development is expected to realise?
- Para 1.2.6 (page 5) – the level of windfalls proposed (10,000 in suburban areas) is not consistent with a plan-led approach to development. Indeed, paragraph 70 of the NPPF is clear that:

'Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.'

Whilst we recognise this is a policy point; the level of windfalls does not reflect National Planning Policy which has sought to minimise Local Planning Authorities reliance upon windfalls by requiring plans to identify specific, developable sites. Reliance upon windfalls in the way proposed does not reflect plan-led, sustainable development.

We believe that the guide should, linked to the overarching development principles supporting the strategic objectives of the CLP, set out criteria that will guide developers/landowners when considering which sites to bring forward in suburban

areas. As way of example, the criteria could include site location, accessibility, distance from public transport and community facilities etc.

- Figures 1.3a - c (pages 7 to 11) are not helpful insofar as they only give a plan view of potential intensification scenarios. Axiomatic drawings are required to provide a three-dimensional understanding of the scale, size and massing of any new development, and the proposed design and how they will relate to the existing development.
- Figure 1.3d (page 12) – a new suburban street does not represent the ‘evolution’ of the suburbs. Is this guidance actually advocating whole scale redevelopment of suburban streets and/or suburban areas? If so, this needs to be made clear. This form of comprehensive redevelopment does not represent ‘evolution.’
- Para 1.3.2 – (page 12) the 15 design objectives underpinning the draft guidance (para 3.1.2) are all laudable. However, the guide needs to demonstrate explicitly how each of these objectives is to be achieved. For example, how is the 5th bullet - resilient and adaptable built form that is capable of accommodating future change - to be achieved? The objective needs to define what is meant by ‘resilient’ and ‘adaptable’ in a suburban context, and specify how this applies to the design, scale, bulk, massing and internal configuration of development.
- Linked to the above comment on para 1.1.4, para 1.4.22 (page 15) states that ‘*it is important that the design of a suburban proposal does not have a detrimental impact on the environment.*’ The guide needs to go further than this, making it clear that the design of a suburban proposal must maintain and enhance residential quality.

Chapter 2

- Para 2.2.1 (page 19) – the overarching development principles supporting the strategic objectives of the CLP are helpful. However, there should be additional development principles:
 - i) supporting high quality design which maintains and enhances residential quality; including the design approach showing respect for and forming a relationship with, the existing built residential environment.
 - ii) addressing the need for car parking in a sustainable manner, including making adequate on-site provision.
 - iii) identifying the additional requirements generated in terms of physical, social and environmental infrastructure and how these will be addressed.
 - iv) that are responsive to any physical or environmental constraints to development in a way which both maintains and improves residential quality.
- Para 2.6.1 (page 22) – instead of ‘*an opportunity to deliver better public services*’ should read ‘*a need to deliver...*’

- Para 2.6.2 (page 22) is critical to the delivery of sustainable development. Linked to our key point (ii) in the covering letter above, it only sets out a statement of intent, rather than the specific planning mechanisms that will be used to ensure that new development is accompanied by the necessary physical, social and environmental infrastructure. As a minimum, this draft guidance should set out how the infrastructure necessary to support new growth is to be calculated, and what mechanisms are in place – linked to the Infrastructure Delivery Plan - to deliver the required infrastructure and public services. This is a critical omission in the guidance; without a clear framework for infrastructure and service delivery, the guide is not contributing to the *'holistic strategy being driven by the Council to deliver tangible public benefits to suburban communities'* (para 1.1.1).
- Para 2.7.3 (page 24) – states that *'whilst physical characteristics may evolve, the sense of a place that defines its character should be enhanced through development.'* Linked to comments on para 1.1.4, how exactly will the Council ensure that new development *'enhances'* the character of an area? What criteria or test(s) will be set to ensure that proposals fully meet this requirement?
- Section 2.8 ('Approaches to Character' - pages 26 - 27) – the guidance should give more advice on which of the three broad approaches is appropriate, so that developers have a clear understanding of which approach is acceptable. For example, a *'sympathetic and faithful'* approach is likely to be the most appropriate choice in larger established suburban areas where a dominant architectural style exists; e.g. in an inter/post-war estate like Riddlesdown, whereas *'innovative and original'* may be more appropriate on smaller estates, or mixed use areas where there is a less dominant architectural style.
- Para 2.9.3 (page 28) – what exactly is meant by: *'Such studies will not normally be required where a neighbour's window directly faces onto or over an application site in a manner that is considered to be un-neighbourly. These unneighbourly windows place undue restraints on the development, and as such the light and outlook they receive will not receive significant protection'*? What is the rationale behind this approach and why is the emphasis upon not restraining development, rather than recognising the need to protect the neighbour's amenity as expressed by the window? Surely, the impact of development on a neighbour's view should be considered on a site-by-site basis, rather than setting a presumption against significant protection?
- Para 2.9.9 (page 29) – this is a crucial paragraph which needs to be developed further. For example, how does one define when *'a development would appear overbearing to a neighbouring property and/or create a poorly designed streetscene'*. It would be helpful if this paragraph were expanded to set out key criteria, linked to CLP policy, which the Council will use to consider whether a development is i) overbearing, and ii) whether a development will create a poorly designed street scene. This should be supported by axiomatic drawings giving good and bad examples in respect to i) and ii).
- Figure 2.9d (2.9.15 - page 30) – are these distances indicative, or requirements based upon CLP policy? If the former, this should be made clear. If the latter, a clear reference to the relevant CLP policy should be provided. Linked to this, it is unacceptable to state in para 2.9.15 that reduced separation distances will be determined on a case-by-case basis. This level of latitude will only encourage

developers to minimise separation distances, and maximise the developed area, which is likely to result in the kind of development para 2.9.9. wishes to prevent. At the very least, the guide should set out separation minima and maxima, linked to CLP policy.

- Para 2.9.18 (page 31) – see comments on para 2.9.15 above – more guidance needs to be provided on appropriate overlooking distances. As stated above, allowing judgement on a site-by-site basis will only encourage developers to propose inappropriate overlooking distances.
- Para 2.10.1 (page 34) – the principle of 3-storey development is established through CLP policy. However, it should be made clear – linked to para 2.9.15 that this should not result in ‘*a development would appear overbearing to a neighbouring property and/or create a poorly designed street scene.*’ Again, it would be helpful to provide illustrations of unacceptable 3-storey development, defining what is meant by ‘overbearing’ or ‘a poorly designed streetscape.’
- Section 2.11 (page 36 onwards) – whilst proposal 2 may be acceptable in terms of the neighbour’s view from their kitchen, the scheme would have a significant impact on the neighbour’s amenity in terms of the view from their garden. As Figure 2.11j (page 38) shows, the bulk and massing of the proposal beyond the rear building line means that it will be visually dominant from any position in the neighbour’s garden. Such a proposal is overbearing, and will have a significant impact upon not only the neighbour’s enjoyment of their property, but will also likely have a negative impact upon the value of the property.
- Section 2.14 (page 44) – it is overly prescriptive to state that corner sites should seek to accommodate additional height and depth. What evidence does the Council have to support this approach? The nature and characteristics of a corner site and the surrounding residential environment will have a crucial role in determining what is appropriate in terms of height and depth. For example, a corner plot on a large suburban estate with a dominant architectural style (e.g. Riddlesdown) is likely to require an approach that is consistent with the existing bulk, scale and massing. Whereas a corner plot in a mixed-use area, with varying build heights and depths, may well be able to support additional height and depth.
- Para 2.18.1b (page 48) – how exactly will the judgement be made, where there is an inconsistent front building line, that the ‘*front elevation of a development may step forward or back provided it does not negatively impact the street scene*’? It would be helpful if the guide provided criteria and illustrations to show how negative impact can be avoided.
- Case studies appendix (page 74 onwards) – a number of these schemes have yet to be built so whether the actual development reflects the positive attributes cited remains to be seen. On this point, each case study should explicitly identify how the scheme exemplifies the requirements of the guidance as set out in each section of the guide. At present, each case study flags a selection of positive attributes, rather than systematically going through the requirements of the guide. The latter approach would help to demonstrate to developers exactly how each aspect of this guide should be applied. In addition, it would be helpful to identify those schemes which are in other London Boroughs.

We disagree with the selection of Riddlesdown Avenue (page 80), as an example of good practice. As we made clear in our objections to the individual schemes that have come forward, there are now in total eleven developments with planning permission, which, when taken together, represent the significant intensification of an established residential area along Riddlesdown Road. We are still not clear how, or indeed whether, the Council have considered the cumulative impacts of these schemes from an environmental, social and physical perspective. Specifically, how have the Council determined the impact on residential amenity, flooding (including surface run-off) and accessibility in respect to Riddlesdown Road? Our specific concerns over these developments include:

- i) the modern designs are not in keeping with the existing residential streetscape. The combination of brown timber cladding, grey aluminium windows and curved green sedum roof are not in keeping with the vernacular architecture. Rather, they jar with the existing aesthetic and undermine the quality of the surrounding residential environment. In particular, the significant number of windows proposed on the front elevations appear incongruous when viewed from Riddlesdown Road.
 - ii) each represents significant development in terms of size, scale and massing, which will have a significant effect on the amenity of the wider residential area. Many of the schemes have dominant aspects in respect to the adjoining residential area which means they will be both prominent and visible.
 - iii) the adopted access road (adjoining and fronting Riddlesdown Road) is narrow, ranging from 2.1 to 2.4 metres wide. This means there are no passing places for two vehicles to manoeuvre and it is difficult to see how pedestrians, including parents pushing buggies and disabled people in wheelchairs, and vehicles are meant to pass each other. There is no street lighting along the adopted access road which, given the housing schemes proposed, potentially compromises pedestrian safety.
 - iv) these developments will make it very difficult for refuse vehicles, fire engines, ambulances, removal vehicles, delivery lorries and other types of HGV's to move along the access road without damaging the grass verges and overhanging trees.
 - v) the garages proposed are very small and not suitable for modern large cars. The lack of appropriate on-site car parking provision will put additional pressure on parking in Riddlesdown Avenue, which is narrow and already heavily congested, i.e. it is not suitable for parking on both sides of the street.
 - vi) there is only one surface water drainage gully on the narrow access road, which we presume, drains into a soakaway. We know that flooding occurs regularly at this point into 2a Riddlesdown Ave, when all the rainwater rushes down the full length of the slope of the bitmac carriageway.
- Linked to above and the Parking Design (page 66 onwards), the RRA believe that the guide should be used to improve information and guidance for parking and garage standards. A document produced by Essex County Council dated September 2009 – *Parking Design - Design and Good Practice* provides excellent guidance on a number of parking requirements; for example, the minimum sizes of garages, parking spaces and minimum distances for overhanging onto the footways etc.

See the link:

https://www.essex.gov.uk/Environment%20Planning/Development-in-Essex/Documents/Parking_Standards.pdf

In our view, garages should be a minimum size of 7m x 3m (internal dimensions) and include a minimum 2.438m (8 ft) wide door opening. It is not right that many new garages can't be used these days because they are too small for modern sized vehicles.

As car manufacturers have admitted, many new cars/SUV's are now wider and parking spaces are now too small to accommodate these vehicles. As Essex CC have stated in their guidance, new parking spaces should now be a minimum 5.5m x 2.9m (rather than the current size of 4.8m x 2.4m), or at least a minimum of 5m x 2.5m. In addition, parking spaces in front of buildings/garages should accommodate cars without overhanging footways. We hope the Council give serious consideration to this suggestion.