

# Scrutiny Streets, Environment & Homes Sub- Committee Agenda



To: Councillors Councillor Leila Ben-Hassel (Chair), Councillor Kola Agboola (Vice-Chair), Adele Benson, Simon Brew, Amy Foster, Christopher Herman and Luke Shortland

Reserve Members: Samir Dwesar, Sean Fitzsimons, Simon Fox, Mohammed Islam, Eunice O'Dame, Ellily Ponnuthurai and Nikhil Thampi

A meeting of the **Scrutiny Streets, Environment & Homes Sub-Committee** which you are hereby summoned to attend, will be held on **Tuesday, 5 July 2022 at 6.30 pm** in **Council Chamber, Town Hall, Katharine Street, Croydon CR0 1NX**

Katherine Kerswell  
Chief Executive  
London Borough of Croydon  
Bernard Weatherill House  
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Tom Downs  
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www.croydon.gov.uk/meetings  
Monday, 27 June 2022

Members of the public are welcome to attend this meeting, or you can view the webcast both live and after the meeting has completed at <http://webcasting.croydon.gov.uk>

If you would like to record the meeting, we ask that you read the guidance on the recording of public meetings [here](#) before attending.

The agenda papers for all Council meetings are available on the Council website [www.croydon.gov.uk/meetings](http://www.croydon.gov.uk/meetings)

If you require any assistance, please contact Simon Trevaskis as detailed above.

## AGENDA – PART A

### 1. **Apologies for Absence**

To receive any apologies for absence from any members of the Committee.

### 2. **Minutes of the Previous Meeting** (Pages 5 - 14)

To approve the minutes of the meeting held on 15th March 2022 as an accurate record.

### 3. **Disclosure of Interests**

Members and co-opted Members of the Council are reminded that, in accordance with the Council's Code of Conduct and the statutory provisions of the Localism Act, they are required to consider **in advance of each meeting** whether they have a disclosable pecuniary interest (DPI), an other registrable interest (ORI) or a non-registrable interest (NRI) in relation to any matter on the agenda. If advice is needed, Members should contact the Monitoring Officer **in good time before the meeting**.

If any Member or co-opted Member of the Council identifies a DPI or ORI which they have not already registered on the Council's register of interests or which requires updating, they should complete the disclosure form which can be obtained from Democratic Services at any time, copies of which will be available at the meeting for return to the Monitoring Officer.

Members and co-opted Members are required to disclose any DPIs and ORIs at the meeting: -

- Where the matter relates to a DPI they may not participate in any discussion or vote on the matter and must not stay in the meeting unless granted a dispensation.
- Where the matter relates to an ORI they may not vote on the matter unless granted a dispensation.
- Where a Member or co-opted Member has an NRI which directly relates to their financial interest or wellbeing, or that of a relative or close associate, they must disclose the interest at the meeting, may not take part in any discussion or vote on the matter and must not stay in the meeting unless granted a dispensation. Where a matter affects the NRI of a Member or co-opted Member, section 9 of Appendix B of the Code of Conduct sets out the test which must be applied by the Member to decide whether disclosure is required.

The Chair will invite Members to make their disclosure orally at the commencement of Agenda item 3, to be recorded in the minutes.

**4. Urgent Business (if any)**

To receive notice of any business not on the agenda which in the opinion of the Chair, by reason of special circumstances, be considered as a matter of urgency.

**5. Sustainable Communities, Regeneration & Economic Recovery Directorate Overview (Pages 15 - 22)**

This report provides an overview of the Sustainable Communities, Regeneration & Economic Recovery Directorate to inform the development of the Committee's work programme including key priorities for the year; budget; performance; key risks and mitigations.

**6. Revocation of Croydon Suburban Design Guide Supplementary Planning Document 2 (SPD2) (Pages 23 - 216)**

The Streets, Environment & Homes Scrutiny Sub-Committee has asked to review the decision taken by the Executive Mayor at Cabinet to recommend to revocation of the SPD2 to Council with a view to understanding the possible risks and next steps.

**7. Housing Directorate Overview (Pages 217 - 224)**

This report provides an overview of the Housing Directorate to inform the development of the Committee's work programme including key priorities for the year; budget; performance; key risks and mitigations.

**8. Scrutiny Work Programme 2022-23**

The Streets, Environment & Homes Sub-Committee is asked to consider which items should be provisionally added to the work programme as a result of the discussions held during the meeting.

**9. Exclusion of the Press and Public**

The following motion is to be moved and seconded where it is proposed to exclude the press and public from the remainder of a meeting:

"That, under Section 100A(4) of the Local Government Act, 1972, the press and public be excluded from the meeting for the following items of business on the grounds that it involves the likely disclosure of exempt information falling within those paragraphs indicated in Part 1 of Schedule 12A of the Local Government Act 1972, as amended."

**PART B**



## Scrutiny Streets, Environment & Homes Sub-Committee

Meeting of Scrutiny Streets, Environment & Homes Sub-Committee held on Tuesday, 15 March 2022 at 6.30 pm via Microsoft Teams

### MINUTES

**Present:** Councillors: Leila Ben-Hassel (Chair), Kola Agboola, and Jade Appleton  
Reserve Members: Councillors Clive Fraser and Michael Neal (substitutes)

**Also Present:** Councillor Patricia Hay-Justice

**Apologies:** Councillors Jeet Bains (Vice-Chair) and Louis Carserides, Luke Clancy and Caragh Skipper

### PART A

#### 7/22 Minutes of the Previous Meeting

The minutes of the meetings held on Tuesday 30 November 2020 and Tuesday 1 February 2022 were agreed as an accurate record.

#### 8/22 Disclosure of Interests

Councillor Jade Appleton informed members of her work with colleagues connected to the Housing Revenue Account (HRA) at the Local Government Association (LGA).

#### 9/22 Urgent Business (if any)

There were no items of urgent business.

#### 10/22 Update on the Housing Improvement Board, and the development of the Croydon Housing Improvement Plan

The Sub-Committee considered a report set out on pages 5 to 34 of the agenda which provided an early draft version of a report due to be considered by the Cabinet on 21 March 2022, on the Housing Improvement Board, and the development of the Croydon Housing Improvement Plan. The Sub-Committee was asked to review the information provided in the draft report and consider whether it wished to make any comments or recommendations

for submission to the Cabinet. The conclusions agreed by the Sub-Committee would be reported to the Cabinet at its meeting scheduled for 21 March 2022.

The Cabinet Member for Homes introduced the item and summarised the key points, highlighting the work done since March 2021 and identifying the fact that there is still more to do around repairs and governance. The Interim Corporate Director of Housing reminded colleagues of the previous draft report which had been provided immediately after the publicity around Regina Road. Members noted the work done following comments made by the Scrutiny Panel and the reaction of the Regulator of Social Housing who had been unimpressed with the plan at that point. In addition, the draft Plan had been reviewed by the Housing Improvement Board who had been of the view that it needed to be more accessible and more focussed. The Plan had since been re-drafted to define a number of key outcomes and milestones with metrics in place for monitoring progress. The Plan would focus on five key areas and would be a live document which would have increased input from the Housing Improvement Board.

The Chair referred to previous feedback and asked colleagues whether past recommendations had been taken into consideration. The Interim Corporate Director of Housing responded that the Plan had captured the recommendations and officers were intending to revisit the Plan to monitor work as it progressed and that this would be included in service planning for 2022/23. The Sub-Committee were informed that evidence of resident engagement and mapping would be included under one document at a future date and feedback from the Housing Improvement Board had also included a requirement for resident engagement to be captured into the Plan.

In response to questions about what plans were in place to engage with residents so that they would feel that the Plan was fit for purpose, the Cabinet Member for Homes informed the Committee that a series of task and finish groups and engagement groups were coming together to report to the Housing Improvement Board. Tenants were now able to have more say and were better empowered with feedback being reviewed to ensure that it informed future action.

The Sub-Committee raised concerns about trust levels and mechanisms that would allow the Council to foresee future issues; it was noted that the introduction of an IT system which could provide a better understanding of trust issues was being considered but was still at an early stage. The Sub-Committee heard that individuals not only needed to be heard but also assured that their decisions were delivered and that budgets needed to be devolved further to benefit tenants, with mechanisms bolstered to ensure delivery was as promised. Survey work was being done around repairs and sampling of a larger group of residents was underway to inform the council and improve feedback and communication. The Sub-Committee was reassured by this approach but felt that culturally there was still a way to go and were of the view that resources and information were key to improvement and needed to be a priority. Members stated that stock surveys had been

promised around Regina Road and were delayed and went on to query who was responsible for dealing with issues around stock condition data.

The Sub-Committee discussed the importance of resident engagement and Members raised concerns about lack of capacity and the chances of this leading to the council being unable to respond to requests. Members heard that capacity was the biggest challenge and were informed of work being done around recruitment. Members noted that the new Corporate Director of Housing would begin employment with the council in May 2022.

Officers informed the Sub-Committee that progress had been made with more resources in place and the Interim Corporate Director of Housing referred to the stock condition data survey which would be an costly piece of work done through external consultants. The Sub-Committee heard that costs would amount to the lower end of hundreds of thousands of pounds, with the Director of Housing - Estates & Improvement as the lead; Members were informed that this data would provide a degree of certainty around the council's future investments.

The Chair asked about information retention and the importance of the council having policies to adhere to in terms of documentation management. The Interim Corporate Director of Housing referred to the process being implemented to develop a newer and much more effective system to record stock data condition and it was stated that this should address some of the issues raised.

Members acknowledged issues and referred to the original draft of the Housing Improvement Plan which had specific start and end dates which linked into the ARK Consultancy report and noted that these were not included in the current version. The Sub-Committee asked if the Tenants and Leaseholders' Panel performance indicators needed to be brought forward to allow them to be included in the Housing Improvement Plan. The Interim Corporate Director of Housing addressed Members' comments and updated them on recruitment. It was acknowledged that there were crucial vacancies within the service and the Sub-Committee were assured that capacity to audit building data would be in place with June 2022 as a realistic timeline.

The Chair referred to the format of the Plan and raised concerns that there appeared to be a lack of accountability and asked for more clarity about who to go to for updates if needed; they felt that key priorities were unclear within the Plan and that anticipated end dates should be incorporated. The Interim Corporate Director of Housing took the opportunity to share internal governance information with Members and noted the Quality Assurance Framework project which highlighted milestones and actions with detail of who was responsible for governance. He agreed that a similar visual governance map with each action would be presented at the next meeting of the Sub-Committee to help clarify mapping of governance under the plan.

The Sub-Committee continued discussion on key priorities and important deadlines and the Chair invited further comments. Members were of the view

that officer visibility was important and that resident contact was a key issue; it was agreed that this is one of the milestones and it was noted that face-to-face contact and the structure of frontline managing systems were being looked at. Members praised the risk star register document as very clear and helpful and asked for a demonstration of priorities and risk levels. In response to questions about key risks, officers agreed that more risk work is required and outlined some of the work currently being done alongside a workshop in March 2022 to address this. Members stated that complaints and compliance procedures needed to be easier for tenants to access as previously recommended.

Members asked how Housing Improvement Plan could guarantee that issues raised around Regina Road would not happen again and how escalations could be captured and issues around complaints made clearer for residents. Officers outlined ways in which the council is responding by providing solutions via improved management of repairs, provision of contracts and dealing with complaints.

The Sub-Committee heard that work was being done with resident representatives to agree standards of complaints and staff were being trained to achieve clear expectations. The Interim Corporate Director of Housing agreed that the service was not responding to complaints within the timeframe in the Plan and stated that this was being looked into. In response to a question about how associated metrics and main compliance indicators would be used to monitor the effectiveness of the Plan, the Sub-Committee were informed of processes currently underway for collecting data and agreed that progress would be judged with other performance data.

In reaching its recommendations, the Sub-Committee came to the following:

**Key conclusions:**

1. The Sub-Committee recognised that a lot of work had gone into delivering the improvement plan and improving housing conditions, though this had not happened as quickly as desired. This meant that a number of key milestones in the plan were scheduled for later than the Sub-Committee would have liked to have seen. The Sub-Committee recognised that this was at least in part due to the need to create capacity within the service and Members were reassured that the corporate Programme Office was now playing a full role in helping to manage delivery of the plan.
2. The Sub-Committee were reassured that the plan was underpinned by a professional and robust programme management approach and was of the view that they would be further reassured if the detailed programme could be shared with them for review at a future meeting.
3. Given the urgency around Housing and Tenants improvement, the Sub-Committee felt that it should continue to scrutinise progress of the delivery of the Improvement Plan on a six-monthly basis
4. The Sub-Committee recognised that delivery of the Improvement Plan was entirely dependent upon staffing capacity within the organisation, and felt that it would be beneficial for the incoming permanent



Corporate Director of Housing to provide an update on staffing capacity to deliver the plan to a future meeting in approximately 3 months' time.

**Recommendations:**

1. The Sub-Committee to receive the detailed programme documentation followed by an officer briefing on it.
2. While recognising that they are separate assurance processes, it is recommended that, in order to avoid duplication of monitoring of the delivery of the improvement plan, the Sub-Committee should meet with the Independent Housing Improvement Board to discuss the roles that both forums play in monitoring and scrutinising the delivery of the plan with recommendations noted and agreed before any amendments of the plan are finalised; and how the two forums can work as value adding partners in this important role.
3. The Sub-Committee further agreed with the Housing Improvement Board's feedback that any changes to the plan should be agreed by the Board (not just delegated as per the Cabinet recommendation).
4. Considering key risks inherent to staffing capacity within the organisation, the Sub-Committee would welcome an update on staffing capacity to deliver the plan by the incoming permanent Corporate Director of Housing at a future meeting in no later than 3 months' time.
5. That although a streamlined version of the plan for ease of access is welcome, the plan available publicly should be amended to include greater detail on when specific actions would be delivered by; who would be responsible for delivering them; the processes that would be used for managing their delivery; and a clear sense of how improvement actions would be delivered. This should include the order in which actions are being prioritised. Any prioritised amendments should be approved by the Housing Improvement Board so there is a clear line of understanding and justification. The committee feels that would help address the Ark's report point on the importance of improving clear lines of accountability.
6. That Cabinet assures itself that risks relating to document management (incl. version control) are being properly mitigated by having good practice documentation management and retention systems in place. This would enable the plan being treated as a live / rolling document without risks while enhancing transparency of how the plan evolves over the improvement journey.
7. On engagement, the Sub-Committee is reiterating a previous recommendation to produce an engagement and communications plan to be appended to the Improvement Plan and reviewed by the sub-committee and the Housing Improvement Board before approval. This should be done no later than the next 3 months as this was raised at the Sub-Committee July's meeting.
8. That Cabinet assures itself that risks relating to the delivery of the new Housing Service IT system, would impede many actions of the plan and should therefore be prioritised as this new system would enable a significant improvement in enabling data collection on contacts made to

the Housing teams – the analysis of which could be passed onto residents, members and others in a timely manner.

9. The Sub-Committee reiterated a previous recommendation from its July Committee that data from the responsive repairs contractor must be shared with the appropriate Management team in order to form a dedicated plan to deal with historic repetitive calls and have a more responsive and effective prioritisation of repairs calls as well as flagging any repetitive calls that would require management to intervene to speed up resolution thus improving tenant's experience.
10. That Cabinet also considers the comments and recommendations made on the Improvement Plan by the Independent Housing Improvement Board for inclusion in future iterations of the Plan which are then brought back to the Sub Committee and Housing Improvement Board for consideration.

## **11/22 Housing Revenue Account Business Plan**

The Sub-Committee considered a report set out on pages 35 to 58 of the agenda which provided an early draft version of a report due to be considered by the Cabinet on 21 March 2022, on the 30 Year Business Plan for the Housing Revenue Account (HRA). The Sub-Committee was asked to review the information provided in the draft report and consider whether it wished to make any comments or recommendations for submission to the Cabinet. The conclusions agreed by the Sub-Committee would be reported to the Cabinet at its meeting scheduled for 21 March 2022.

The Interim Corporate Director of Housing provided an overview on the Housing Revenue Account (HRA) which it was noted had been self-financing since 2012. As a result of the government redistributing all council housing debt from across the country according to a complex formula, Croydon Council received £200 million in debt from their housing stock. The HRA was ring-fenced for landlord activities and could not be used to subsidise general funds although the Sub-Committee heard that there was a continuous transfer of funds. Members were reminded that Croydon had a large amount of housing stock which needed to be maintained. The recommendation from central government was to develop a HRA Business Plan that detailed how this would happen and the period of time over which it would take place, with a recommendation of 30 years.

The Sub-Committee were shown a spreadsheet with assumptions around financial implications and the Interim Corporate Director of Housing outlined a summary of the HRA Business Plan detailing spend and income. The Sub-Committee noted that the policy would stay in place until 2024 and that Croydon would be incorporating the 30 year recommendation. Members also noted that the proposed HRA Business Plan focussed on the affordability of maintaining the council's stock. The Business Plan set out the council's finances over the next 30 years based upon assumptions such as rent levels, and Members were of the view that data held on stock condition showed a substantive backlog of work was required and capital spending could only be

increased over a number of years to bring stock up to standard. The report further highlighted in detail the HRA Revenue balance, the Capital expenditure and risk and Members heard that this would inform the capital programme for the next year and enable decision making around building reserves, etc.; the Asset Management Strategy would address how the money would be spent.

Members thanked officers for the information on stock status but raised concerns around increased management costs and were informed that the operating service per unit was higher in Croydon than the national average, but that debt per unit was higher. The Sub-Committee requested detail of how these metrics worked and were of the view that it would be interesting to see how this compared to other outer London authorities. It was noted that loan to value is higher in Croydon and Members requested clarification on this. The Interim Corporate Director of Housing responded that he felt that the margin of gross management and repairs was not staggeringly different from other boroughs but agreed that more work was needed to look at these figures in detail.

The Chair stated that further commentary on how the benchmarking data was captured was very helpful. The Sub-Committee noted that HRA debt had increased since 2013 and were informed that this was mostly due to acquisitions rather than investment in the existing stock. Members asked if Croydon had the structure and staff in place to ensure that the information was correct and heard that the review of the HRA budget was done without the Business Plan, which would now address the Asset Strategy. Officers informed the Sub-Committee that information on capital spending would be going to Full Council in January 2023, with submission before then. Members were of the view that capacity remained an issue and that there was a reluctance to use consultants to undertake the work to alleviate the pressure on staff. Officers agreed that capacity had been raised formally and was an operational issue which was being looked into and put forward for expertise to help with the workload. The Interim Corporate Director of Housing spoke about proposals to look at how consultants could add value, but stated that there were certain areas where ownership from within the organisation was vital. Savills had been used previously for the Business Plan and consultants may be used for work around the asset management strategy for some aspects.

The Sub-Committee discussed issues around delivery of carbon neutrality and costs related to debt and the availability of extra capital funding. Members were of the view that the council's approach to debt was not clear and needed to be included in the report; Members stated that it was important to review the strategic choices that the council had taken and whether poverty, state of repairs and improvement of system stock was considered. The Interim Corporate Director of Housing stated that transparency of costs was a priority. Members felt that the stock condition was poor and agreed that more spending would likely be needed in the future.

The Sub-Committee queried whether the council had a choice about state regeneration and developing a better mix on estates and asked what access the council had to external funding and Section 106 money. Members asked if the council was able to negotiate for affordable housing with developers as opposed to housing associations and how strategic shortages could be built up. The Cabinet Member for Homes reminded Members of the two priorities; these were to maintain existing stock and to bring stock up to a decent standard. The Sub-Committee were informed that the housing strategy would advise on what was required at the appropriate time.

The Chair discussed principles around good practice as set out by the LGA and asked about reserve levels and how these compared with other authorities. Members heard about how wider governance would be put in place within Housing to reconcile with the Business Plan as part of the 3-year annual internal review. The Sub-Committee discussed risk-management and Members asked for clarity on how risks would be reported and managed. The Interim Corporate Director of Housing agreed to look into how this was done and ways of building this into future work.

The Chair asked how the impact of benefit changes, cost of living issues and rent arrears were referred to within the Business Plan and was informed that this was assumed under the title of 'bad debt.' A broad assumption had been incorporated into the Plan but was not specific to this.

In reaching its recommendations, the Sub-Committee came to the following:

### **Key Conclusions:**

1. The Sub-Committee was positive that there was a clear financial model in place and felt that this was a positive outcome of the different services related to housing being brought back together under one directorate.
2. The Sub-Committee was not confident that the service had the required staffing capacity to deliver the works detailed in the plan and was concerned that lack of capacity and necessary skills would impede its delivery. The Sub-Committee highlighted the example that while the Council had capacity challenges in ensuring that it maintained an effective stock register, it would be unlikely that there would be capacity to deliver the actions related to achieving carbon neutrality within eight years.
3. The Sub-Committee questioned the basis on which the £27m budget for cyclical repairs had been set. Members were concerned that as greater levels of staffing capacity became available, the service would identify greater levels of need for repair and improvement works and that funds may be taken from the HRA reserves in the case of an over spend on the budgets allocated.
4. The Sub-Committee noted that the HRA reserve levels were being reduced to a minimum level of just over £8m in the short term and expressed its concern at this approach.

5. The Sub-Committee noted that the Plan does not include any future projects and that this would remain the case until the Asset Management Strategy was developed.
6. That future iterations of the business plan need to be informed by a thorough understanding of what aspects of demand the council's housing stock will lead on meeting when considered in the broader context of all Croydon's social housing providers. As such, the Sub-Committee would welcome the development of a clearer housing supply strategy that involved tenants in choosing which capital investments should be prioritised.

**Recommendations:**

1. The Sub-Committee noted that the housing department still had work to do in meeting some good practice principles, such as having an Asset Management Strategy, Treasury Management and that some elements of governance were being established and recommends that Cabinet acknowledges these shortcomings to the plan and asks the Housing Improvement Board to help it set an appropriate timetable for delivering these outstanding actions.
2. That, given the current healthy level of reserves available to the HRA, Cabinet gives consideration to seeking external capacity and resources in order to expedite the stock condition work and to accelerate the development of the asset management strategy.
3. That given the significant rise in energy costs, consideration be given to prioritising insulation works in the cyclical repair programme in advance of future Homes Improvement Grant funding becoming available through the Social Housing Decarbonisation Fund, priority for this must be met through having sufficient staff allocation and resources.
4. That Cabinet states more clearly in the HRA business plan the costs, budget and overall relationship with the delivery of the Housing Improvement Plan in cooperation with the members of the Housing Improvement Board.

**12/22 Exclusion of the Press and Public**

This motion was not required.

The meeting ended at 10.04 pm

**Signed:**

**Date:**

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For general release

<b>REPORT TO:</b>	<b><i>Streets, Environment &amp; Homes Scrutiny Sub Committee</i></b> <b><i>5 July 2022</i></b>
<b>SUBJECT:</b>	<b><i>Sustainable Communities, Regeneration &amp; Economic Recovery Overview</i></b>
<b>LEAD OFFICER:</b>	<b><i>Nick Hibberd, Corporate Director, Sustainable Communities, Regeneration &amp; Economic Recovery</i></b>
<b>CABINET MEMBER:</b>	<b><i>Mayor Jason Perry, Executive Mayor</i></b> <b><i>Cllr Jeet Bains, Cabinet Member for Planning &amp; Regeneration</i></b> <b><i>Cllr Scott Roche, Cabinet Member for Streets &amp; Environment</i></b>
<b>PERSON LEADING AT SCRUTINY COMMITTEE MEETING:</b>	<b><i>Nick Hibberd, Corporate Director, Sustainable Communities, Regeneration &amp; Economic Recovery</i></b>

<b>ORIGIN OF ITEM:</b>	The Scrutiny Sub-Committee will receive an overview of the Sustainable Communities, Regeneration & Economic Recovery Directorate to assist in work programming for the rest of the year.
<b>BRIEF FOR THE COMMITTEE:</b>	This report provides an overview of the Sustainable Communities, Regeneration & Economic Recovery Directorate to inform the development of the Committee's work programme including: <ul style="list-style-type: none"> <li>• Key priorities for the year</li> <li>• Budget</li> <li>• Performance</li> <li>• Key risks and mitigations</li> </ul>

## 1. EXECUTIVE SUMMARY

1.1 The Sustainable Communities, Regeneration and Economic Recovery Directorate aims to make Croydon cleaner, greener and safer, a place of opportunity and economic recovery for all who live, work and visit.

The focus of this directorate is to:

- ensure the safe and effective delivery of the vital regulatory duties the Council has in terms of planning, building control, licensing, highways and

parking services, independent travel, trading standards and environmental health.

- safeguard vulnerable people at risk of violence and anti-social behaviour.
- facilitate the delivery of new strategic and sustainable regeneration proposals, drive the economic recovery of the borough post covid and offer skills development opportunities for local people.
- safeguard and manage the public realm and the many beautiful parks and open spaces in the borough, promote place making and;
- develop the Council's cultural offer for the Borough of Culture 2023, including the museum, libraries, music and arts and leisure services.

1.2 The Directorate is organised into 3 main services areas:

- **Planning & Sustainable Regeneration** comprises Building Control, Development Management, Spatial Planning, Growth Zone, Regeneration, Strategic Transport & Employment Skills & Economic Development.
- **Culture and Community Safety** is made up of Culture, Leisure, the Museum and Libraries; the Violence Reduction Network; and Croydon Music and Arts.
- **Sustainable Communities** is made up of Highways & Parking Services, Environment and Waste management, Parks and Open Spaces, Environmental Health, Private Sector Housing, Trading Standards & Licensing, and Independent Travel Services.

1.3 Not all of the service areas within the Directorate fall under the remit of the Streets, Environment & Homes Scrutiny Sub Committee. This report focuses on providing a brief introduction and overview of those aspects of the Directorate that relate to the Streets and Environment elements of the terms of reference of this Scrutiny Sub Committee, namely the built environment, planning policy, public realm, transport, highways and streets, green and clean, the environment, climate change and sustainability, flood risk management.

## 2. KEY PRIORITIES FOR THE YEAR ACROSS THE DIRECTORATE

2.1 The Directorate has the following priorities relating to Streets and Environment for 2022/23, which are subject to review over the coming months to ensure that work is aligned to the emerging priorities of the Executive Mayor:

- Convene stakeholders, developers, investors and Croydon's diverse communities to create economic opportunity for all through good work and tackling inequalities.
- Develop sustainable communities, planning and sustainable regeneration policies and strategies including action on climate change. Use our statutory powers to enable growth, development and investment as well as use them to retain heritage assets and preserve the uniqueness of the borough.



- Deliver high quality Planning and Building Control services which respond quickly and appropriately to meet the needs of developers, businesses and homeowners.
- Deliver key projects in the metropolitan centre, including the development of the Whitgift centre and wider town centre regeneration, working with partners including Greater London Authority, Transport for London, Croydon Local Partnership, the Metropolitan Police, Croydon BID and others to ensure the centre remains a safe, usable and vibrant destination for visitors which is attractive to residents, visitors and investors now and in the future.
- Work with regional and central government to unlock funding, investment and growth. Creating district centres that are vibrant, well-used places where people and businesses want to be.
- Work with key partners to ensure that the borough has high quality public places and parks that all our residents can enjoy.
- Drive improvements, efficiencies and added value from our waste, recycling, leisure, highways, and street lighting PFI contracts whilst exploring new service models and ways of working.
- Lead on the delivery of the carbon neutral action plan to achieve the council's ambition of being carbon neutral by 2030
- Deliver high quality universal services that keep the borough clean, green and safe.

### **3. KEY FACTS AND FIGURES**

#### **3.1 Refuse, recycling & street cleansing**

- Over 1.3million individual waste and recycling collections made each month from:
  - 131,000 kerbside households. 22,204 communal households.
- Over 40 waste collection rounds deployed on a daily basis. Over 138,000 tonnes of household waste collected each year, of which
- Recycling performance 2020-21 – 41.3% (current 2021-22 recycling rate c.44%) This performance represents the 6th highest Local Authority recycler in London Over 57,000 tonnes of separated recyclable and compostable waste collected each year, of which over 22,000 tonnes is garden waste.
- Over 500 kg of residual (non recycling) waste created per household per year. Over 800 bulky waste collections carried out each month. Over 3,000 new waste containers delivered each month.
- Over 777km of public highways swept and cleansed each week.

#### **3.2 Park & Open Spaces**

- 127 parks and green spaces. Croydon is in the top 7 London boroughs for distribution of green spaces in relation to total borough size. The borough has a diversity of habitats, ranging from ancient woodland and chalk grassland to urban parks and blue spaces, which host locally and nationally important flora and fauna. This includes 75 Sites of Importance to Nature

Conservation, 5 Local Nature Reserves, 2 Sites of Special Scientific Interest and 1 National Nature Reserve. With this wealth of important natural resource, it is incumbent on the council to manage and protect these spaces for the benefit of people and for nature.

- There is an estimated 5.5 million recreational visits to Croydon Council managed green spaces per year. This includes nearly 2.7 million 'active' visits which equated to an estimated £33.7m in welfare gains in 2018. For the health and wellbeing benefit of all our residents, it is vital that the council supports access to, and use of, these well-maintained spaces.

### 3.3 Highways

- 726km of Roads, 945km of footways, 28,863 streetlights, 63 bridges, 30,000 road gullies, 3500 soakaways.
- 33,000 on street trees.
- Estimated backlog of repairs c86m. Capital budget is c15m this year of which 3m is from TfL for contribution to bridge works.

### 3.4 Parking

- Off street we have 18 car parks which hold approximately 1400 parking spaces
- 22 Controlled Parking Zones around the borough
- 31 civil enforcement officers working - 7am-11pm Monday-Saturday and Sundays 9am-5pm.
- 26 school streets operational with 12 planned for 22/23 and a further 13 subject to funding. This would put the council in the top quartile in London
- Emission based pay and display and permits. Free one hour parking in 9 local and district centres and we have 2 locations where it is 30 minutes free.

### 3.5 Planning

- Croydon is a busy Local Planning Authority when benchmarked against other London boroughs. On the basis of government returns which record only certain types of applications, Croydon is the 8th busiest of 33 London authorities with 2,696 applications. However, if all applications are considered which includes conditions discharge, tree works and advertisements, the numbers rise to over c.5000 p/a.
- The approval rate is 68% which is the second lowest in London
- Planning appeals % allowed – Croydon are the 4<sup>th</sup> most successful of 33 London authorities
- Householder appeals % allowed – Croydon are 17<sup>th</sup> most successful of 33 London authorities.
- The borough currently has an up to date development plan with the existing Local Plan and South London Waste Plan, both are under review to ensure the statutory requirement of an up to date development plan is maintained.

## 4. **DIRECTORATE'S FINANCIAL POSITION AND BUDGETARY RISKS**

- 4.1 The SCRER directorate continues to deliver significant savings and service improvements as part of the Croydon Renewal Programme. The gross expenditure budget for 22/23 is £104m, and the net budget for 22/23 is £26.5m,

with savings to be delivered of £12.4m, with growth of £7.4m. There is a significant capital programme of £45m for 2022/23.

- 4.2 SCRER directorate generates significant levels of income, particularly within the Planning, Highways and Parking, and Sustainable Communities divisions. The socio-economic conditions post covid are creating an uncertain environment on which these income levels are predicated with fewer major applications, declining town centres and high streets and a reduction in commuting. This has led to an under recovery of income in the 2021/22 budget and could lead to budget pressures in 2022/23 across income generating teams, particularly in parking services.
- 4.3 The Sustainability and Climate Emergency priority will require a significant reduction in carbon emissions through levers such as extending the roll out of electric vehicle charging points and promoting active travel initiatives.
- 4.4 COVID restrictions in 2021 meant we saw a continued loss of parking income due to downturn in footfall/traffic within the borough. Despite restrictions lifting, the income has not yet significantly improved and this reflects the societal change where working patterns have now changed on a semi-permanent basis (COVID restrictions requiring increased working from home) and the shift to accessing retail and other services online. In addition, there have been some delays in implementing the Healthy Neighbourhood and School Streets programmes, which has also impacted our ability to recover enforcement income. This means that there is a risk that the parking income target for 2022/23 will not be met.
- 4.5 The Council applied to renew its Landlord Licensing scheme in 2021/22 to the Department of Levelling Up, Housing and Communities (DLUHC). In the 2022/23 Budget process the Council budgets for income to be delivered from the scheme in this financial year. However, the scheme was rejected by the Secretary of State for LUHC due to the lack of a Housing Strategy, one of the requirements for the scheme. The development of the Housing Strategy is being progressed but has not yet been completed due to the many other pressures in the Housing Service and the delivery of the Housing Improvement Plan and it also requires a review of the Council's policy for Landlord Licensing. This will result in the risk of non-delivery of the income target within the 2022/23 budget.
- 4.6 A number of services in the directorate are sensitive to inflation, particularly related to rising fuel/energy prices that could cause pressures for suppliers and/or service delivery.
- 4.7 There are new legislative burdens that the council will need to implement and respond to. Significantly, the Fire Safety Act and Building Safety Bill, which will mean the council has far greater responsibility for building safety; and the new Protect Duty that gives the council greater Counter Terrorism duties particularly in the context of sensitive buildings, sites and events.

## **5 Priorities for Improvement in the Directorate:**

- 5.1 An Improvement Plan is being developed for the Sustainable Communities, Regeneration and Economic Recovery Directorate. Some key improvement

projects have already been identified and are outlined below:

- **Town Centre Regeneration.** Town Centre Governance and area-based approach. The creation of a town centre governance model that provides a coordinated and cohesive response to the regeneration and management of the town centre.
- **Improvement in the Planning Service.** Planning services across the country are facing recruitment challenges. This, with Croydon's level of development, volume of applications, development requirements set by the London Plan 2021 and regeneration ambitions, mean that the service needs improvement, development, and probably additional resource. A review by the Planning Advisory Service (PAS) will help to inform appropriate resourcing levels and service improvements, particularly in respect of technology, increase approvals rates, reduce appeals, increase efficiency of enforcement activity, and better manage hostility to new development.
- Executive Mayor Perry made a clear manifesto pledge in the 2022 pre-election period to revoke the Croydon suburban design guide supplementary planning document (SPD2). The Mayor has indicated this pledge is to ensure new development respects character, is led by design over density and improves the quality of future development. A report was presented to Cabinet on 22 June which sets out the basis for the revocation for consideration by Council following Cabinet.
- The Levelling Up and Regeneration Bill, which includes a number of proposed legislative changes for the plan making process, which will need to be given regard as part of the continued work on the Local Plan Review. Proposals include simplifying and standardising the process for local plans so that they are produced more quickly, digitalising the system to make local plans easier to find, understand and engage with and are easier for communities to influence.
- **Improvement of waste collection and street cleansing.** Executive Mayor Perry has outlined 'Clean up Croydon' as one of his priorities, including improving street cleaning and refuse collection through effective contract management and enforcement against fly-tippers. The general graffiti removal service will be reintroduced and the grass cutting regime increased.
- The performance of the refuse, recycling and street cleaning service provider is below contract performance thresholds. The three key areas are missed residential collections, repeat missed residential collections and delivery of wheelie bins. The service provider has received a Service Improvement Notice under the formal contract escalation process. This requires the service provider to take action to remedy and provide a detailed Service Improvement Plan. The service providers performance and improvement plan are monitored through the monthly monitoring framework. The South London Waste Partnership contract for waste collection is a 24 year contract with an initial 8 year term with an option to extend by a further two 8-year terms (8+8+8yrs). The contract is approaching the end of its first term and the partnership and boroughs will consider options for extension of this contract or future service provision. A commissioning strategy is provisionally scheduled for October 2022.

- A review of the Neighbourhood Safety Officer and enforcement services is underway in line with the budget proposals agreed in March 2022.
- **Parking Services.** This programme will consider how to develop a new parking service, including new parking policies that achieve our statutory objectives and support both our Carbon Neutral and economic recovery objectives. All parts of the service are in scope and efficiency, for example more automated payments, will be a key part of improvement.
- **Building Control.** The project will address the building control service's need for transformation to ensure that it continues to meet its current and new statutory obligations. Local authority building control services struggle to compete for qualified building surveyors with the private sector that can cherry pick lucrative simple work. This is making it ever harder for the service to meet its fee income targets. New obligations under the Building Safety Bill will increase local authority duties and responsibilities, with unknown budget implications.

## 6. OTHER KEY RISKS FOR THE DIRECTORATE

- 6.1 **Energy costs** – our street lighting consumes a significant amount of energy over the year, and whilst the council is undertaking a trial with set dimming regimes. Energy price inflation is creating budget pressures.
- 6.2 **Fuel (petrol & diesel)** There has been a significant increase in the cost of fuel - this has been exacerbated by the conflict with Russia and the Ukraine. The councils supply chain partners are raising concerns regarding the contract mechanism to agree contract inflation / indices.
- 6.3 **Building Control** The lack of skilled and appropriately experienced building surveyors who wish to work in local authority Building Control teams. This is an issue throughout the country but is particularly acute in London. The need to maintain a continuous 24-hour Dangerous Structure Rota puts a particular strain across the service, with a workforce who are increasing in age and few young people wishing to enter the profession. The new regulations being brought in by the government with more onerous capability requirements is driving older and less qualified staff to retire and this is exacerbating the shortage of appropriate staff.

## 7. UPCOMING NATIONAL POLICY CHANGES AND THE IMPACT ON THE COUNCIL

- 7.1 The **Levelling-up and Regeneration Bill** seeks to empower local leaders to regenerate their areas with measures covering devolution, planning and local government finance reforms. As well as seeking to deliver against some of the ambitions set out in the Levelling Up White Paper, it also incorporates some of the proposals for planning reform outlined in the earlier Planning for the Future White Paper (August 2020), where those proposals support the governments approach to Levelling Up. The final content of the Act, including the transitional arrangements, will have a direct impact on the scope, budget requirement and programme for ensuring the borough has an up to date development plan.

- 7.2 The new **Building Safety Bill** was published in July 2021 and is progressing through Parliament will bring new duties and responsibilities to Local Authorities both as a building owner and as a Building Control team. A key part of these changes will be the new Building Safety Regulator which will allocate work on high-risk buildings thus removing the ability of developers/contractors to choose their preferred Building Control body. The Building Safety Regulator has stated that work should in the first instance go to Local Authorities rather than the private sector. We have been advised that it would be total fee recovery, however in view of the increased enforcement duties that are proposed, and that these are not fee chargeable, this will create a pressure.
- 7.3 The **Environment Act** was passed into law on 10th November 2021. Defra explained that the Environment Act will help the “transition to a more circular economy, incentivising people to recycle more, encouraging businesses to create sustainable packaging, making household recycling easier and stopping the export of polluting plastic waste to developing countries”. The Environment Act gave ministers the power to introduce a range of waste reforms such as extended producer responsibility (EPR), consistent collections and a deposit return scheme (DRS). There have been ongoing consultations regarding the EPR, DRS and consistent collection.

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**CONTACT OFFICER:** Nick Hibberd, Corporate Director, Sustainable Communities, Regeneration & Economic Recovery

**BACKGROUND DOCUMENTS:** None

<b>REPORT TO:</b>	Scrutiny Streets, Environment & Homes Sub-Committee 5 July 2022
<b>SUBJECT:</b>	<b>Revocation of Croydon suburban design guide supplementary planning document (SPD2)</b>
<b>LEAD OFFICER:</b>	Nick Hibberd – Corporate Director of Sustainable Communities, Regeneration and Economic Recovery  Heather Cheesbrough – Director of Planning and Sustainable Regeneration  Steve Dennington - Head of Spatial Planning (& Interim Head of Growth and Regeneration)
<b>PERSON LEADING AT SCRUTINY COMMITTEE MEETING:</b>	Nick Hibberd – Corporate Director of Sustainable Communities, Regeneration and Economic Recovery
<b>PUBLIC/EXEMPT:</b>	Public

<b>ORIGIN OF ITEM:</b>	Executive Mayor Perry made a clear manifesto pledge to revoke the Croydon suburban design guide supplementary planning document (SPD2). The Mayor has indicated this pledge is to ensure new development respects character, is led by design over density and improves the quality of future development. The Cabinet report sets out the basis for the revocation for consideration by Council.
<b>BRIEF FOR THE COMMITTEE:</b>	The Scrutiny & Overview Committee is asked to review the decision taken by the Executive Mayor at Cabinet to recommend to revocation of the SPD2 to Council with a view to understanding the possible risks and next steps.

## **Revocation of Croydon suburban design guide supplementary planning document (SPD2)**

- 1.1. The Streets, Environment & Homes Scrutiny Sub-Committee has asked to evaluate the work undertaken to prepare for the revocation of Croydon suburban design guide supplementary planning document (SPD2).
- 1.2. The purpose of evaluating the work is to provide assurance that the Council has followed a robust process and understands the relevant risks. The Sub-Committee would also like to investigate plans for the replacement of SPD2.

### **CONTACT OFFICER:**

Tom Downs – Democratic Services & Governance Officer – Scrutiny

Email: [Tom.Downs@croydon.gov.uk](mailto:Tom.Downs@croydon.gov.uk)

**Background Documents:** None

**Appendices:**

Appendix 1 – Cabinet Report – 22 June - Revocation of Croydon suburban design guide supplementary planning document (SPD2)



<b>REPORT TO:</b>	<b>CABINET - 22 June 2022</b>
<b>SUBJECT:</b>	<b>Revocation of Croydon suburban design guide supplementary planning document (SPD2)</b>
<b>LEAD OFFICER:</b>	<b>Nick Hibberd – Corporate Director of Sustainable Communities, Regeneration and Economic Recovery</b>  <b>Heather Cheesbrough – Director of Planning and Sustainable Regeneration</b>  <b>Steve Dennington - Head of Spatial Planning (&amp; Interim Head of Growth and Regeneration)</b>
<b>CABINET MEMBER:</b>	<b>Cabinet Member for Planning and Regeneration – Cllr Jeet Bains</b>
<b>WARDS:</b>	<b>All</b>

## **SUMMARY OF REPORT:**

Executive Mayor Perry made a clear manifesto pledge in the 2022 pre election period to revoke the Croydon suburban design guide supplementary planning document (SPD2). The Mayor has indicated this pledge is to ensure new development respects character, is led by design over density and improves the quality of future development. This Cabinet report sets out the basis for the revocation for consideration by Council following Cabinet.

The Croydon suburban design guide supplementary planning document (SPD2) was adopted in April 2019, with an approximate 18 month production time up to adoption, in a particular context that has changed notably up to present day.

At a national level, the National Planning Policy Framework 2021 includes a chapter dedicated to 'Achieving well-designed places'. This is supplemented by the publication in 2021 of the National Design Guide and National Model Design Code that provide the framework for how to produce design guides and codes. This guidance states this is to provide and create beautiful and distinctive places with a consistent and high quality standard of design.

In May 2022 the government published the Levelling Up and Regeneration Bill, which includes a number of proposed legislative changes to the plan making process, which will need to be given regard as part of the continued work on the Local Plan Review.

Regarding the London Plan, SPD2 was produced in the context of the submitted London Plan (July 2018), which included a proposed housing target for Croydon of 2,949 per annum (2019 -2029) with a clear expectation that a large proportion of this development would be accommodated through small site development. Post the London Plan Examination process, including the planning inspectors' panel report and Secretary of State approval, the adopted London Plan 2021 includes a housing target for the borough of 2,079 per annum (2019 – 2029) inclusive of a 641 per annum small sites target (2019 – 2029)

The London Plan 2021 is proposed to be supplemented by a series of design guidance. Most notably, the Greater London Authority has published draft guidance regarding Optimising Site Capacity: A Design Led Approach and Small Sites Design Codes. This guidance, particularly once adopted, will be material to the production of the borough's Local Plan Review.

For the reasons set out in this report and the matters summarised in this section, the revocation of SPD2 is justified fully and appropriate at this time. Therefore, setting the context and requirement for recommendation 1.2.

To reflect the manifesto pledges of the Mayor and in response to representations received on the Proposed Submission Local Plan Review (December 2021) the Local Plan review is being revisited, particularly regarding the proposed policy context for achieving conformity with the London Plan 2021 small sites policy (H2), the annual small sites housing target and the policy approach to design and character.

It is recommended to produce the residential extensions and alterations part of SPD2, with revisions, as a stand alone supplementary planning document.

## **FINANCIAL IMPACT**

The revocation of SPD2 in resource and budget terms can be accommodated as part of the existing Spatial Planning establishment and supplies and services budget.

It is recommended that the chapter relating to residential extension and alterations as part of the current SPD2 is progressed as a stand alone supplementary planning document. The chapter is a valuable material consideration and tool for the Local Planning Authority and planning officers in assessing and determining applications of this type. This project can be funded from the existing Local Development Framework / Local Plan earmarked reserve.

To reflect the manifesto pledges of the Mayor and in response to representations received on the Proposed Submission Local Plan Review (December 2021) the Local Plan review is being revisited.

Whilst the use of the existing earmarked reserve brought forward from 2021/22 to finance the cost of the residential extension and alterations SPD, that reserve would no longer be available to finance the costs of the planned local plan review – those equivalent costs thus will be a further budget pressure.

**FORWARD PLAN KEY DECISION REFERENCE NO: NA**

## **RECOMMENDATIONS**

The Executive Mayor, in Cabinet, is recommended to:

- 1.1 Recommend to Council the revocation of the Croydon suburban design guide supplementary planning document (SPD2) (Appendix1) in accordance with Regulation 15 (2) and (3) of the The Town and Country Planning (Local Planning) (England) Regulations 2012.
  
- 1.2 Agree to produce the residential extensions and alterations chapter of the Croydon suburban design guide supplementary planning document (SPD2) as a supplementary planning document. To be reported to Council for adoption after consultation.

## **1. Detail**

### **1.1 Current position**

1.2 The Croydon suburban design guide supplementary planning document (SPD2) was adopted in April 2019, with an approximate 18 month production time up to adoption. SPD2 was produced at a time that at the national and London level there was very limited guidance published to support Council's in the production of design guides to accommodate housing growth, especially housing supply from small sites in suburban locations. The intention was for the Council to set out design guidance in the face of a submitted London Plan housing target (2,949 per annum) that was nearly double that included in the Local Plan 2018 (1,645 per annum). SPD2 has operated as a material planning consideration to the determination of planning applications for suburban housing schemes and proposals for residential extensions and alterations. SPD2 remains a material consideration to the determination of planning applications with its weight a matter for the decision maker.

1.3 The adopted Local Plan 2018 is part of the Council's development plan and planning applications are determined in accordance with the development plan unless material consideration indicate otherwise.

1.4 The review of the Local Plan had reached its final stages with the proposed submission Local Plan Review being agreed by the then Cabinet for publication in December 2021. In early 2022, the proposed submission Local Plan Review was published for consultation. Since the conclusion of the consultation, officers have been processing and analysing representations received. The engagement in this stage is welcomed to inform the next stage of the Local Plan Review.

1.5 To reflect the manifesto pledges of the Mayor and in response to representations received on the Proposed Submission Local Plan Review (December 2021) the Local Plan review is being revisited. This opportunity to reflect will be used to understand in greater detail the manifesto pledges of the Mayor and respond to representations received on the Proposed Submission Local Plan Review (December 2021).

### **1.6 SPD2 Revocation**

1.7 The Croydon suburban design guide supplementary planning document (SPD2) was adopted in April 2019, with approximately 18 month production up to adoption, in a particular context that has changed notably up to present day. Due to these notable changes and their number it is recommended SPD2 is revoked in full to enable the following changes in circumstances to be taken into account.

1.8 What is clear from the below, is a greater emphasis and responsibility for local authorities to develop place based design guidance and codes to guide sustainable growth and help achieve housing targets.

- 1.9 At a national level the National Planning Policy Framework 2021 includes a chapter dedicated to 'Achieving well-designed places'. This chapter at paragraph 126 states *'Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process'*. Furthermore, at paragraph 127 it states *'Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics'*. This guidance is clear that in the development of policy and / or design guidance, good design is at the core of sustainable development and design policies should be developed with communities.
- 1.10 The NPPF is supplemented by the publication in 2021 of the National Design Guide and National Model Design Code that provide the framework for how to produce design guides and codes to provide and create beautiful and distinctive places with a consistent and high quality standard of design. It is also stated that having regard to these two documents will illustrate how well-designed places that are beautiful, healthy, greener, enduring and successful can be achieved in practice. These guidance documents are material in the production of design guidance and the Local Plan Review. Furthermore, in the absence of SPD2 the National Design Guide will be material to assessing and determining development proposals.
- 1.11 The Levelling Up and Regeneration Bill, which includes a number of proposed legislative changes for the plan making process, which will need to be given regard as part of the continued work on the Local Plan Review. Proposals include simplifying and standardising the process for local plans so that they are produced more quickly, digitalising the system to make local plans easier to find, understand and engage with and are easier for communities to influence.
- 1.12 With regard to the London Plan, it is statutory requirement for the Local Plan Review to be in conformity with the London Plan. Focussing on the context of this report, that includes conformity with the London Plan 2021 housing target of 2,079 per annum (2019 – 2029), Policy H2: Small Sites and the 641 per annum small sites housing target (2019 – 2029) as part of the overall 2,079 per annum target. Policy H2: Small Sites also requires boroughs to prepare design codes for small sites, where appropriate.
- 1.13 To support boroughs with accommodating this growth in a sustainable manner the Greater London Authority (GLA) has published (early 2022) draft guidance - Optimising Site Capacity: A Design Led Approach and Small Sites Design Codes. This guidance, particularly once adopted, will be material to the production of the borough's Local Plan Review and design guidance. The GLA state the purpose of Small Sites Design Codes guidance is to *'provide information on how to prepare area-wide housing design codes on small sites for a range of character types. Where appropriate, planning authorities and neighbourhood planning groups should refer this guidance at the planning making stage when developing design codes. Once a design code is adopted*

*for a specific area, boroughs and other decision-makers are expected to use these as a basis for their decision making'. The GLA also outline that 'these design codes should pro-actively support well-designed new homes on small sites by providing clarity and certainty over the design and quality of small site residential development'.*

- 1.14 Taken as a whole, the context in which SPD2 was produced and adopted, and with the notable and numerous changes in circumstances and guidance, the revocation of SPD2 enables a reset to the borough's design guidance. It also provides the opportunity for design guidance to be produced post adoption of the Local Plan Review and define the scope of design guidance based on the content of the Local Plan Review. This review of design guidance would have been necessary regardless of the revocation of SPD2 given the change in circumstances outline in this report.
- 1.15 The SPD2 chapter regarding residential extensions and alterations remains a valuable tool for planning officers, as a material consideration in the determination of these types of planning applications and, where appropriate, prior approvals and assessment of planning conditions. Given its value as a material consideration and how it informs the assessment and management of these types of development, it is recommended to produce the residential extensions and alterations part of SPD2, with revisions, as a stand alone supplementary planning document.
- 1.16 To reflect the manifesto pledges of the Mayor and in response to representations received on the Proposed Submission Local Plan Review (December 2021) the Local Plan review is being revisited, particularly regarding the proposed policy context for achieving conformity with the London Plan 2021, Policy H2: small sites, the annual small sites housing target and the approach to design and character. This opportunity will include revisiting the policies, areas and evidence regarding the focused and moderate intensification areas included in the Proposed Submission Local Plan Review (December 2021). The necessary revised programme will accommodate the opportunity to listen to residents, residents' associations and bring about cross party working to define how the borough can accommodate sustainable growth, including the London Plan 2021 housing target.

## **2. CONSULTATION.**

- 2.1 The legislative process for the revocation of SPD2 is set out in Regulation 15 (2) and (3) of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 2.2 The process is that as soon as reasonably practicable the local authority must:
- Cease to make any documents relating to the revoked supplementary planning document available.
- Take such other steps to draw the revocation of the SPD to the attention of persons living or working in the area.
- 2.3 Furthermore, all those that made a representation on the consultation on SPD2,

form part of the Council's Local Development Framework database and statutory bodies will be notified of the revocation.

- 2.4 The residential extensions and alterations supplementary planning document will be consulted on in accordance with the the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council's Statement of Community Involvement.

### **3. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION**

- 3.1 The Croydon suburban design guide supplementary planning document (SPD2) was adopted in April 2019, with an approximate 18 month production time up to adoption, in a particular context that has changed notably up to present day.
- 3.2 At a national level the National Planning Policy Framework 2021 includes a chapter dedicated to 'Achieving well-designed places'. This is supplemented by the publication in 2021 of the National Design Guide and National Model Design Code that provide the framework for how to produce design guides and codes. This guidance states this is to provide and create beautiful and distinctive places with a consistent and high quality standard of design.
- 3.3 In May 2022 the government published Levelling Up and Regeneration Bill, which includes a number of proposed legislative changes to the plan making process, which will need to be given regard as part of the continued work on the Local Plan Review.
- 3.4 Regarding the London Plan, SPD2 was produced in the context of the submitted London Plan (July 2018), which included a proposed housing target for Croydon of 2,949 per annum (2019 -2029) with a clear expectation that a large proportion of this development would be accommodated through small site development. Post the London Plan Examination process, including the planning inspectors' panel report and Secretary of State approval, the adopted London Plan 2021 includes a housing target of 2,079 per annum (2019 – 2029) inclusive of a 641 per annum small sites target (2019 – 2029)
- 3.5 The London Plan 2021 is proposed to be supplemented by a series of design guidance. Most notably, the Greater London Authority has published draft guidance regarding Optimising Site Capacity: A Design Led Approach and Small Sites Design Codes. This guidance, particularly once adopted, will be material to the production of the borough's Local Plan Review and Design Guidance.
- 3.6 For the reason set out in this report, the revocation of SPD2 is justified fully and appropriate at this time. Therefore, setting the context and requirement for recommendation 1.2.
- 3.7 To reflect the manifesto pledges of the Mayor and in response to representations received on the Proposed Submission Local Plan Review (December 2021) the Local Plan review is being revisited, particularly regarding the proposed policy context for achieving conformity with the London Plan 2021



small sites policy (H2), the annual small sites housing target and the policy approach to design and character.

#### **4. OPTIONS CONSIDERED AND REJECTED**

- 4.1 The alternative would be not to revoke SPD2 at this stage, but having full regard, and taken as a whole, to the priorities of the Mayor and the notable and numerous changes in planning framework it is considered this option is not the preferred option.

### **5 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS**

#### **1 Revenue and Capital consequences of report recommendations**

- 5.1.1 The revocation of SPD2 (Recommendation 1.1) in resource and budget terms can be accommodated as part of the existing Spatial Planning establishment and supplies and services budget.
- 5.1.2 Recommendation 1.2 will require existing resource and budget prioritisation and additional resource and budget.
- 5.1.3 It is proposed that the existing dedicated earmark reserve for the Local Development Framework / Local Plan (£100k) be used to fund recommendation 1.2.
- 5.1.4 Once the scope of the revisit of the local plan review is understood then an assessment will be made of the costs of any further work and stages required to progress the Local Plan Review to adoption. This review of costs will also have regard to any associated design guidance that might be required post adoption of the local plan review. These costs will be considered and reported to Cabinet as part of future reports on local plan review.
- 5.1.5 To produce the residential extensions and alterations chapter of the Croydon suburban design guide supplementary planning document (SPD2) as a supplementary planning document (recommendation 1.2) will require resource to produce the guidance across the programme, one stage of consultation and adoption. It is considered this recommendation inclusive of production costs, staff costs and taking account of inflation, would be up to £100k. Therefore, the costs can be met by the existing dedicated earmark reserve for the Local Development Framework / Local Plan.
- 5.1.6 The proposed use of the existing earmarked reserve brought forward from 2021/22, will result in those reserves being unavailable to finance the costs of the local plan review – such costs as incurred on the latter will thus become a budgetary pressure in year.

#### **5.2 The effect of the decision**

- 5.2.1 The decision will commit the Spatial Planning Service to the revocation of SPD2.

5.2.2 Recommendation 1.2 will require existing resource and budget prioritisation and additional resource and budget. This will be achieved through the process outlined in Section 5 of this report.

### **5.3 Risks**

5.3.1 It is unlikely that that cost of producing the residential extensions and alterations supplementary planning document will exceed the funding available. This risk will be mitigated by ensuring that the scope of the process is tailored to enable the costs to be managed within budget.

### **5.4 Options**

5.4.1 The alternative would be not to revoke SPD2 at this stage, but having full regard and taken as a whole, the priorities of the Mayor and the notable and numerous changes in planning framework it is considered this option is not the preferred option.

### **5.5 Future savings/efficiencies**

5.5.1 In the context of recommendation 1.2, having up to date supplementary planning guidance decreases the risk of 'planning by appeal' and the considerable costs that are incurred through the planning appeal process.

5.6 Approved: Matt Davis (Interim Director of Finance)

## **6. LEGAL CONSIDERATIONS**

6.1 As explained in this report, the Local Planning Authority has the power to revoke any supplementary planning document in accordance with Regulation 15 (2) and (3) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (the Regulations).

6.2 Should the recommendation to revoke SPD2 be approved, the Council should, as soon as reasonably practicable:

- Cease to make any documents relating to the revoked supplementary planning document available; and
- Take such other steps to draw the revocation of the supplementary planning document to the attention of persons living or working in the area.

6.3 The recommendations in this report seek approval to fully revoke SPD2. The Regulations do not specifically make provision for a partial revocation of a supplementary planning document.

6.4 The Council has sought external legal advice in respect of the recommendation to revoke SPD2.

Approved by Kiri Bailey, Head of Commercial & Property Law on behalf of the Interim Director of Legal Services & Deputy Monitoring Officer.

## **7. HUMAN RESOURCES IMPACT**

- 7.1 The decision will commit the Spatial Planning Service to undertake the revocation of SPD2. This can be accommodated within existing Spatial Planning staffing resource establishment.
- 7.2 Recommendation 1.2 will require existing resource prioritisation and / or additional staffing resource. This will be established in tandem with the approach outlined in section 5. In the event that additional staffing resource is required, this will need to be costed and an appropriate budget/funding source identified. As with any addition to establishment this will need to be approved by the Council's Spend Control Panel. Any new staffing should also take into consideration the Council's Equality and Diversity Strategic aims of employing a workforce that is representative of the community we serve.
- 7.2 Approved by : Dean Shoesmith, Chief People Officer

**8. EQUALITIES IMPACT**

- 8.1 The appended Croydon suburban design guide supplementary planning document – Revocation - Equality Analysis, concludes no major changes are required as a consequence of this report.
- 8.2 Approved by: Denise McCausland - Equality Programme Manager

**9. ENVIRONMENTAL IMPACT**

- 9.1 A Sustainability Appraisal (SA) was prepared for the Croydon Local Plan 2018. Given that SPD2 only supplemented the policies within the Local Plan, it is that the environmental benefits of the Local Plan 2018 are unaltered.

**10. CRIME AND DISORDER REDUCTION IMPACT**

- 10.1 There are no known direct crime and disorder impacts.

**11. DATA PROTECTION IMPLICATIONS**

- 11.1 **WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

**YES**

Personal data will be handled in accordance with the Planning and Compulsory Purchase Act 2004, the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council's longstanding and agreed practices regarding Local Development Framework engagement through the Local Development Framework database.

- 11.2 **HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN**

## **COMPLETED?**

**YES – reference number 521257**

- 11.3 The Corporate Director of Sustainable Communities, Regeneration and Economic Recovery confirms that a DPIA has been completed and is currently under review.
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**CONTACT OFFICER:** Steve Dennington Head of Spatial Planning (& Interim Head of Growth and Regeneration)

## **APPENDICES TO THIS REPORT**

Appendix 1 – Croydon suburban design guide supplementary planning document (SPD2)

Appendix 2 – Croydon suburban design guide supplementary planning document – Revocation - Equality Analysis

## **BACKGROUND PAPERS**

Croydon suburban design guide supplementary planning document (SPD2) – Adoption Cabinet and Council Report -

<https://democracy.croydon.gov.uk/documents/s14460/Suburban%20Design%20Guide%20report.pdf>



# SUBURBAN DESIGN GUIDE

SUPPLEMENTARY PLANNING DOCUMENT

CROYDON COUNCIL

## **ISSUE 1**

Suburban Design Guide Supplementary Planning Document (SPD) adopted by Croydon Council on 1st April 2019.

This document is available to view and download online at: <https://www.croydon.gov.uk/spd>.

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An isometric, aerial view of a city grid. The buildings are primarily red and brown, with some green roofs. There are streets, trees, and a few cars. A semi-transparent white box is overlaid on the top half of the image, containing the chapter title.

# CHAPTER 1: OVERVIEW

# INTRODUCTION

## 1.1 OVERVIEW OF THIS DESIGN GUIDE

1.1.1 This design guide provides guidance for suburban residential developments and extensions and alterations to existing homes across the borough. It is a Supplementary Planning Document (SPD) which should be used by residents, developers, builders and agents including architects and planning consultants in shaping development proposals, and will assist in making decisions on planning applications and inform the Council's pre-planning application service. Beyond providing technical design guidance, this guide sets out how residential development, including extensions and alterations, in neighbourhoods across the borough is part of a holistic strategy being driven by the Council to deliver tangible public benefits to suburban communities.

1.1.2 With a growing population there is a necessity to build more homes. This is reflected in the current housing target set in the Croydon Local Plan 2018; 32,890 new homes are expected to be delivered in the borough by 2036. It is anticipated that meeting housing need will become more challenging with the adoption of the emerging London Plan<sup>1</sup>. In order to achieve well-designed places, the National Planning Policy Framework (NPPF) states that '*To provide maximum clarity about design expectations at an early stage, plans or supplementary planning documents should use visual tools such as design guides and codes. These provide a framework for creating distinctive places,*

*with a consistent and high quality standard of design. However their level of detail and degree of prescription should be tailored to the circumstances in each place, and should allow a suitable degree of variety where this would be justified*'. The places of Croydon (as defined in the Croydon Local Plan to *provide further design detail in the form of Place-specific development management policies aspiration to achieve good design while retaining and improving the distinctiveness of each place*), including the suburbs and neighbourhoods outside the main Metropolitan Centre of the borough, provide a great opportunity for delivering new homes and it is expected that one third of these, approximately 10,000, will be delivered through small scale suburban developments (windfall developments). In Croydon there are a number of low density and suburban locations which have been identified as having the capacity and ability to accommodate additional housing, benefiting new and existing residents. New homes will allow Croydon to provide truly lifetime communities, places where there are homes for people of all ages; first homes, homes for families and homes for down sizers. Similarly, residential extensions and alterations can allow homes to be adapted to suit the changing needs of residents. This allows people to stay in the communities they love through generations.

1.1.3 The evolution of the suburbs to provide homes that will meet the needs of a growing population has the potential to add new vitality to the places of Croydon. More people living in a place provides a better prospect of improved public services, such as transport and health care. This

is particularly important in the remotest of suburban locations which have suffered from a lack of infrastructure to support the local community. The Council and partners are planning for increased population and how services can be delivered to support them. For example, investment in new transport initiatives will benefit those communities currently poorly served, as well as benefitting new residents. Infrastructure policies and site allocations within the Croydon Local Plan (including, for example, sites for schools and health facilities) and the Council's Infrastructure Delivery Plan provide for the increased demand forecast as a result of the borough wide development growth. Increased populations also provide the basis for local shops to remain open, allowing local businesses to thrive, and supporting local shopping parades as thriving centres of the community.

1.1.4 It must however be recognised that delivering approximately 10,000 homes in the suburban places of Croydon will result in an evolution of the existing character of suburban streets and that the increased density of homes can impact on the amenity of existing residents if not properly managed. This 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.

<sup>1</sup> As amended from time to time.



Figure 1.1a: Higher density housing designed by Peter Barber Architects exemplifying high quality and enjoyable design that enhances the character of the local area without replicating the existing pattern, scale, form or materials of the context. (Photo: Morley von Sternberg)

# 1.2 WHAT IS COVERED BY THIS GUIDANCE?

**THIS GUIDANCE IS BROKEN DOWN INTO THREE SECTIONS:**

1. Suburban Residential Development
2. Areas of Focussed Intensification
3. Residential Extensions and Alterations.

The table below shows where the guidance is applicable.

	SUBURBAN RESIDENTIAL DEVELOPMENT	AREA OF FOCUSED INTENSIFICATION	RESIDENTIAL EXTENSIONS AND ALTERATIONS
Residential development proposals, generally under 25 homes	X	X	
Mixed-use proposals, including those that would deliver more than 25 homes		X	
Not generally located in the Croydon Metropolitan Centre and District Centres*	X	X	
Anywhere in the borough			X

\*In these areas there is greater scope for development than allowed for in this guide.

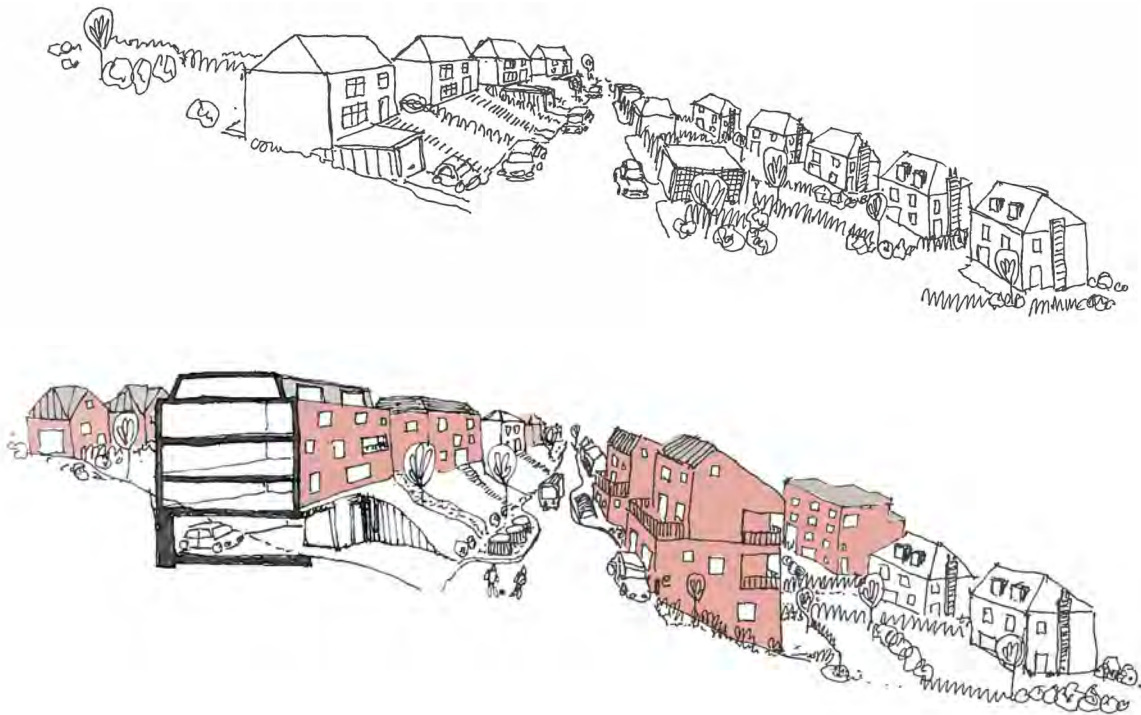


Figure 1.2a: Before and after - Possible development within an Area of Focussed Intensification.



Figure 1.2b: Before and after - Suburban Residential Development.

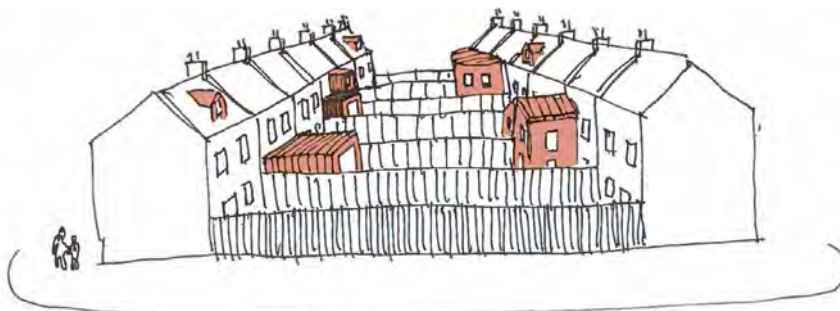
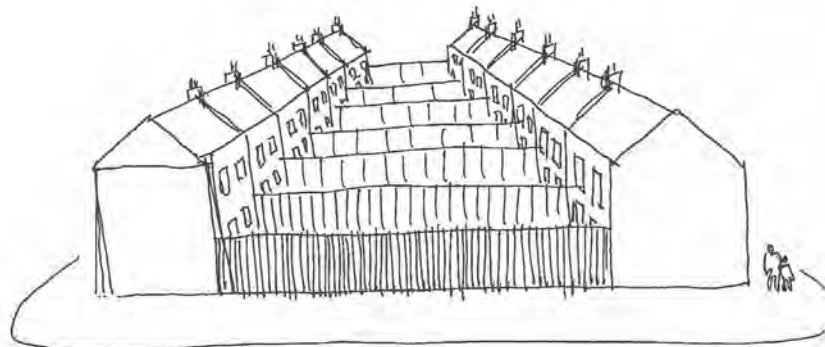


Figure 1.2c: Before and after - Residential Extensions & Alterations.

## **WHO SHOULD USE THIS GUIDE?**

1.2.1 This guide is intended for the use of any person involved in proposing or assessing development proposals as previously outlined. It provides guidance for residents, home owners, community groups, developers and associated agents in designing their proposals. It does not negate the need for a planning application.

1.2.2 While development in the borough is managed by the policies set out in the Croydon Local Plan and the London Plan<sup>2</sup>, it is recommended that regard should be given to this supplementary guidance when preparing designs and planning applications, including those which are Permitted Development. It will assist Local Planning Authority officers in making decisions on planning applications and is a material consideration in assessing planning applications. In line with National, London and borough policies, poor design can be a reason for refusal, therefore the use of this guidance is important. Use of this guidance should lead to better quality developments that contribute positively to Croydon, benefit the people of Croydon and should add value for those who develop too.

1.2.3 This document not only establishes guidance on how to achieve an acceptable design, but aims to encourage the highest quality of design by promoting a well thought-through design process, balanced with the need to protect neighbouring amenity, so that the places we live in are both attractive and liveable and contribute to Croydon's future success.

## **WINDFALL SITES: WHAT ARE THEY?**

1.2.4 Windfall sites are sites which are not identified for development as an allocated site under the Croydon Local Plan, including many suburban sites. For example, existing homes that are redeveloped to provide several homes or proposals for building homes in rear gardens.

## **WHAT IS AN SPD?**

1.2.5 An SPD is a Supplementary Planning Document. SPDs form part of the Local Development Framework (LDF). They are produced to provide supplementary guidance, information or clarification on the Local Plan or other Development Plan policies. While SPDs do not carry the statutory weight that the Local Plan policies or Development Plan documents do, they should be used as guidance and material consideration in preparing and assessing planning applications

## **RELATIONSHIP TO THE LOCAL PLAN**

1.2.6 The Croydon Local Plan provides the planning policy context for this guide. The policies within the Local Plan have greater weight in determining planning applications as part of the Council's development plan, but it is expected that applicants shall adhere to this guide as a significant material consideration to the determination of planning applications. When determining applications, the Croydon Local Plan and its policies, along with relevant guidance, are taken as a whole to reach a balanced decision.

1.2.7 The Croydon Local Plan was adopted in February 2018 and sets out the housing target for the borough. Croydon is planning for 32,890 new homes by 2036. Given the limited developable land available for residential development in the built up areas, the need to accommodate homes across the borough to meet the borough's need, whilst not undermining the valued character and heritage of Croydon is imperative. In order to deliver on the housing target for the borough, it is expected that these homes will be provided through approximately: 11,000 new homes in the Croydon Metropolitan Centre; 7,000 on allocated sites across the borough; 10,000 on windfall sites; and a further 5,000 being either completed or under construction already. This equates to approximately 1,600 new homes per year by 2036 amounting to roughly 1 new home for every 5 that currently exist. This reliance on windfall sites is supported by the NPPF and the Croydon Local Plan provides the evidence base to support this position, having been

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<sup>2</sup> As amended from time to time.

found sound at the Croydon Local Plan examination. Furthermore, policies within the Local Plan protect from the substantial loss of residential gardens in line with the NPPF guidance for windfall sites.

1.2.8 In the Croydon Local Plan, Policy DM10 outlines the expected modes of suburban development on windfall sites including conversion, additions, infill and plot subdivision, rear garden development and regeneration, while Table 6.3

designates four (4) Areas of Focussed Intensification; areas with established infrastructure but relatively low density and the potential to accommodate a significant increase in residential development. Policy DM10.11 provides the policy that development in areas of focussed intensification should be assessed against. The Local Plan states that *‘Developments in focussed intensification areas should contribute to an increase in density and a gradual change in character.*

*They will be expected to enhance and sensitively respond to existing character by being of high quality and respectful of the existing place in which they would be placed’.* Further detail in relation to the expected evolution or change in character of different areas is set out in Table 6.4 of the Local Plan (see Figure 1.2d below).

Method of accommodating growth and improving Croydon	How it works	Applicable policies
<b>Evolution without significant change of area’s character</b>	Each character type has a capacity for growth. Natural evolution is an ongoing process where development occurs in a way that positively responds to the local context and seeks to reinforce and enhance the existing predominant local character. Most development throughout the borough will be of this nature.	DM10.1 – DM10.10
<b>Guided intensification associated with enhancement of area’s local character</b>	Areas where the local character cannot be determined as a result of no one character being dominant, further growth can be accommodated through place specific enhancement policies.	DM34 – DM49
<b>Focussed intensification associated with change of area’s local character</b>	Further growth can be accommodated through more efficient use of infrastructure. Due to the high availability of community and commercial services, intensification will be supported in and around District, Local and potential Neighbourhood Centres which have sufficient capacity for growth.	DM10.11
<b>Redevelopment</b>	In larger areas where growth would result in a change to the local character it must be supported by masterplans or design codes.	DM36.2 DM38.1 DM49.1

Figure 1.2d: Table 6.4 from the Croydon Local Plan.

# 1.3 EVOLUTION OF THE SUBURBS

1.3.1 The suburbs as we know them today have largely evolved over the past century. Inter and post-war development saw the construction of large areas of suburban housing, expanding from the terraced suburban streets built in the Victorian era. In the past 50 years, the suburbs have continued to evolve, through the construction of new homes, as well as extensions and alterations to existing homes. Development coming forward today is part of this on-going evolution of the suburbs to provide new housing for younger and older generations, and will continue across the borough in all types of neighbourhoods. Whether through development of land to the rear of a row of terraced houses, or the redevelopment of a larger home into several family homes, the indicative evolution of typical street patterns is illustrated in Figures 1.3a, 1.3b and 1.3c, and will result in more and larger buildings. The process of suburban evolution indicated here is expected over a period of 10 – 15 years, however it is recognised that market conditions may bring about change in a shorter period of time. The guidance is written so that it is relevant to creating sustainable neighbourhoods regardless of the rate of development to ensure that the benefits of such growth are optimised.

## Key

- Existing Houses
- Existing back lands (including garages)
- New Homes





→ 2036

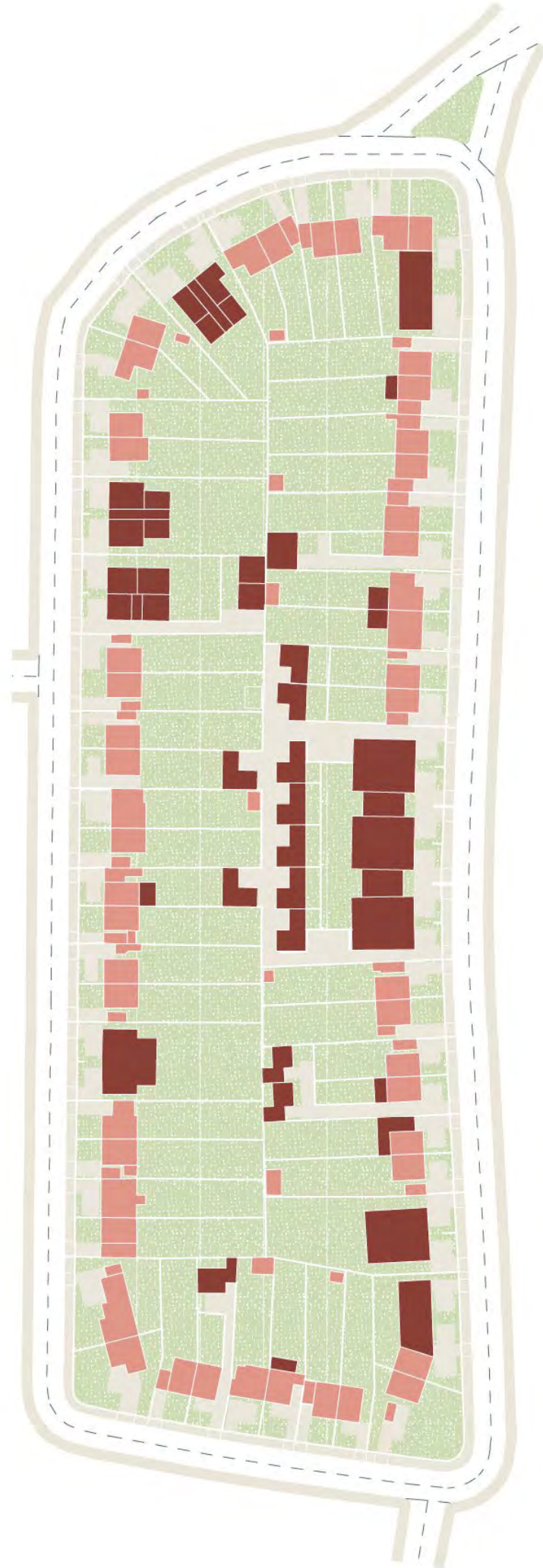


Figure 1.3a: Evolution of streets with semi-detached homes.



2018 —

Key

- Existing Houses
- Existing back lands (including garages)
- New Homes

→ 2036



Figure 1.3b: Evolution of streets with detached homes.



2018 — —

Key

- Existing Houses
- Existing back lands (including garages)
- New Homes

— — — — — → 2036



Figure 1.3c: Evolution of streets with terraced homes.

1.3.2 The evolution of the suburbs is underpinned by the strategic objectives of the Croydon Local Plan which are required to fulfil Croydon's spatial vision and deliver the Croydon Local Plan policies. Key design principles that support the objectives of the Croydon Local Plan and will help to ensure suburban growth is suitable and sustainable include:

- Creating places where people can live, work and play within their neighbourhood;
- Providing homes for people of all ages and needs to live in one neighbourhood, with the services to support them;
- Delivering developments that respond to and enhance the existing character of a neighbourhood and its built appearance;
- Delivering development that preserves or enhances designated heritage assets<sup>3</sup>,

<sup>3</sup> Designated heritage assets include Listed Buildings, Conservation Areas, Registered Parks and Gardens and Scheduled Monuments.

- non-designated heritage assets<sup>4</sup>, views and landmarks;
- Resilient and adaptable built form that is capable of accommodating future change;
- Delivering environmentally sustainable communities which are designed to minimise environmental impacts and reduce consumption of energy and other resources;
- Creating places that are legible and easy to navigate;
- Creating well-designed streets<sup>5</sup>, that are attractive and operational;
- Delivering walkable and cycle-friendly communities;
- Providing access to open spaces;
- Providing access to transport infrastructure and other public services;
- Providing access to shopping

<sup>4</sup> Non-designated heritage areas include Locally Listed Buildings, Local Heritage Areas, Locally Listed Historic Parks and Gardens (Archaeological Priority Areas).

<sup>5</sup> Refer to TfL's Healthy Streets for London guidance available at: <http://content.tfl.gov.uk/healthy-streets-for-london.pdf>.

- and leisure facilities;
- Contributing to the community's health and well-being;
- Contributing to economic activity and prosperity; and
- Supporting and encouraging social cohesion.

1.3.3 Suburban growth occurs whether it is planned or not. As families grow and the population increases, housing needs to change and the suburbs change with them. Some residents choose to renovate their homes to accommodate a growing family and others redevelop, while some downsize or seek alternate housing options. This evolution shapes the suburbs and identifies a need for the guidance set out in this document to ensure that the suburbs are sustainable for future generations.



Figure 1.3d: Larger suburban developments, of up to 25 homes as covered by this guide, may result in the creation of a new suburban street with a mixture of flats and houses.



Figure 1.3e: A development of flats designed by Alison Brooks Architects within an existing residential street. (Photo: Paul Riddle)

# 1.4 DESIGN AND PLANNING PROCESS

1.4.1 The Council requires development to be high quality and this should inform the design of a project brief at the earliest stage, as well as the subsequent design proposals.

1.4.2 For some residential extensions and alterations, the proposal may be covered by Permitted Development rights. It is crucial to determine whether a proposal needs planning permission before undertaking any work<sup>6</sup>. Any works to a Listed Building, including those covered by Permitted Development rights, are likely to require Listed Building consent in addition to any planning permission.

1.4.3 For further advice on whether planning permission may be required, or for any planning enquiries, please refer to the Council's website<sup>7</sup>.

<sup>6</sup> Information about the planning process and relevant documents, policy and legislation can be found on the Planning Portal at: <https://www.planningportal.co.uk/>

<sup>7</sup> Information on the pre-application services provided by Croydon Council can be found at: <https://www.croydon.gov.uk/planningandregeneration/pre-application-meeting-service>

## PROFESSIONAL SERVICES

1.4.4 Engaging an architect, designer and/or planning professional can help to ensure your proposal meets your requirements, along with relevant planning policies and guidance.

1.4.5 By working with a professional, applicants are more likely to achieve high-quality proposals, which will add greater value to a development.

1.4.6 It is strongly advisable to employ a registered architect or competent agent to design your proposal.

1.4.7 For more complex developments, it can be necessary to seek the assistance of planning consultancies to advise and to help take your scheme through the planning process. You may also need to take advice from other consultants including structural engineers, quantity surveyors and transport consultants.

## DEVELOPING A BRIEF

1.4.8 Regardless of the size of your project, a brief should be developed in consultation with your architect and/or any other consulting professionals. A brief should clearly set out the required outcome of the proposal, be that in terms of required space or a particular architectural ambition. It should also identify potential constraints. A brief should respond to the relevant aspects within this guide depending on type of project.

## SCOPING CONSTRAINTS AND OPPORTUNITIES

1.4.9 In order to understand how a proposal might respond to the site and surrounding context, it is important to understand what constraints and opportunities might be relevant to a future development.

1.4.10 Planning constraints, including flooding, Metropolitan Green Belt Land, Conservation Areas, Local Heritage Areas, Historic Parks and Gardens and archaeology, can be searched using the Local Plan interactive map<sup>8</sup>. Listed Buildings and Locally Listed Buildings are not contained on this map and should be searched on the relevant council webpages<sup>9</sup>. Listed Buildings, Registered Parks and Gardens and Scheduled Monuments can also be searched using Historic England's National Heritage List for England<sup>10</sup>.

1.4.11 For proposals affecting the historic environment, including Listed Buildings and Conservation Areas, further advice is provided in section 1.4 Heritage.

1.4.12 Applicants should consider both the existing constraints on a site and future constraints, such as where planning permission has been granted on neighbouring land but has not yet been built. Wherever possible it is helpful to include both existing and approved neighbouring developments on submitted drawings to help illustrate the cumulative impact of development along a street and how this may affect the streetscene.

<sup>8</sup> Available at: <http://www.planvu.co.uk/croydon2018/>

<sup>9</sup> Available at: <https://www.croydon.gov.uk/planningandregeneration/framework/conservation>.

<sup>10</sup> Available at: <https://historicengland.org.uk/listing/the-list/map-search?clearresults=True>.



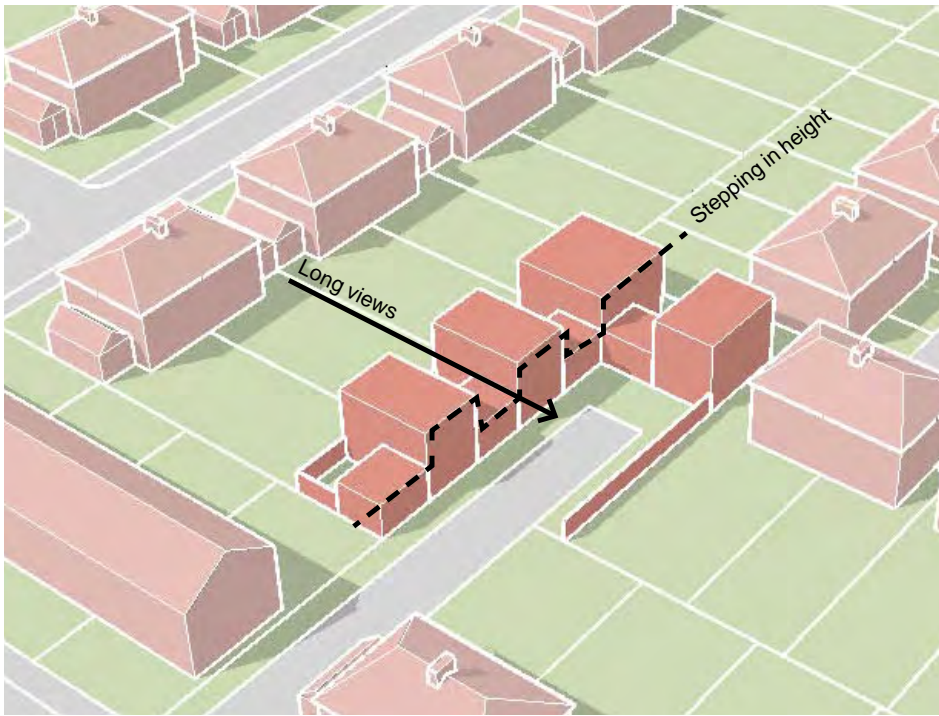


Figure 1.4a: A diagram indicating how site constraints and opportunities might inform the development of the design. The proposal has introduced a stepping form as per guidance Section 2.13.



Figure 1.4b: A pair of houses designed by Bell Phillips Architects with a strong suburban character and contemporary design. (Photo: Kilian O'Sullivan)

## HERITAGE

1.4.13 Particular care must be taken for a proposal which impacts on heritage assets. These include Listed Buildings, Conservation Areas, Locally Listed Buildings and Local Heritage Areas. Heritage assets can be physically affected by proposals, and also affected by proposals in their surroundings (their setting).

1.4.14 Much of the guidance contained in this document is relevant to proposals affecting heritage assets. However, where there is conflict between this guidance and the conservation of heritage assets, the conservation of heritage assets has more planning weight and should be prioritised.

1.4.15 Where a proposal affects a heritage asset, the following process should be followed:

1. Identify heritage assets affected by the proposals. Information on scoping

constraints and opportunities is available in section 1.4.9. For larger proposals, heritage assets in the surrounding area as well as on the site itself should be identified.

2. Understand what is important about the heritage asset (its significance). The reasons why a heritage asset is significant differs in each case. A number of resources are available via the Conservation pages of the council's website<sup>11</sup> to help identify significance. Dependent on the nature of your proposal and the asset(s) affected, further historic research may be needed to understand the significance of the site, such as looking at historic maps, or on-site assessment.
3. Design the proposal to respond to the significance of the

<sup>11</sup> Available at: <https://www.croydon.gov.uk/planningandregeneration/framework/conservation>.

heritage assets. Elements of a proposal such as scale and massing, layout, proportions, materials, architectural style or positioning should be designed to preserve or enhance the significance of heritage assets. Dependent on their particular significance, it may be appropriate for your proposal to directly imitate the architectural style, or for a complementary but distinct modern approach to be taken.

1.4.16 The above process should be outlined within a Heritage Statement, and submitted with your planning application to explain and justify your approach.

1.4.17 Please check the Conservation pages of the Council's website for further resources. For conservation areas, the council's Conservation Area General Guidance (CAGG) and area-specific Conservation Area Appraisal and Management Plans (CAAMPs) provide a summary of significance and detailed guidance on the type of development which may be appropriate<sup>12</sup>. These documents should be consulted at the start of any design process affecting a conservation area.

1.4.18 Where a proposal affects heritage assets, engaging with the council at a pre-application stage is strongly encouraged. Engaging a heritage specialist and/or conservation architect can also be extremely beneficial<sup>13</sup>.

<sup>12</sup> Available at <https://www.croydon.gov.uk/planningandregeneration/framework/conservation/conservation-areas>.

<sup>13</sup> Although not exhaustive nor a recommendation, the Institute of Historic Building Conservation (IHBC), Royal Institute of British Architects and Architects Accredited in Building Conservation Ltd. all hold lists of relevant conservation specialists.



Figure 1.4c: An infill development in the East India Conservation Area.

## **ALTERNATIVE HOUSING MODELS**

1.4.19 The council seeks to support good-quality innovative models of housing, particularly self-provided housing.

1.4.20 For non-standard, bespoke and innovative models of residential development such as co-housing, co-living, community-led housing, self-build and custom build, there may be flexibility in the application of aspects of this guidance, however the Council will not accept any reduction in design quality or standard of residential accommodation. For co-housing and co-living schemes that propose shared amenities and facilities in place of amenities and facilities ordinarily provided within or as part of a residential unit, the Council will seek to ensure that individual units are appropriately sized and liveable and that any shared amenities and facilities are also appropriately sized, comfortable and genuinely useable by all residents. Any community-led scheme would be required to conform to the accepted principles of a community-led project<sup>14</sup>.

1.4.21 Non-standard or innovative housing models will not be supported if they are being proposed as a way of avoiding residential space and design standards or that would result in substandard residential accommodation.

## **DEVELOPING A DESIGN**

1.4.22 The development of a design proposal is a dynamic process and can take many iterations before it is successful. It should develop out of the brief and should adhere to the relevant planning policies and guidance. Certain aspects, such

<sup>14</sup> Principles and further information available at: <https://www.communityledhousing.london/clh/>.

as sustainable design and building regulations, must be considered in all proposals.

## **SUSTAINABLE DESIGN**

1.4.23 It is important that the design of a suburban proposal does not have a detrimental impact on the environment. Adaptable, sustainable buildings will better respond to the changing needs of society and the environment as the suburbs continue to evolve.

1.4.24 Proposals should be designed to reduce reliance on energy; for instance, utilising natural daylight and ventilation, whilst being orientated to avoid overheating. Materials with better performance qualities, such as insulation, should be used wherever possible. Landscaping is a key factor in embedding environmental sustainability into a design and should be treated as an integral part of any proposal, where appropriate. If considered at an early stage, insulation, heating, ventilation systems and lighting can all be integrated with the building design. Integrated design ensures that comfort and conditions are optimised at minimum cost and energy consumption.

1.4.25 An environmentally responsive proposal will consider the local environmental impacts of the development, such as biodiversity and flooding. Developments within Flood Zones 2 and 3 will not usually be supported and would require sequential and exception tests as outlined in Policy DM25 and Table 8.1 of the Croydon Local Plan. Development should seek to protect and enhance biodiversity and should refer to Section 2.33 for guidance.

1.4.26 Sustainable design also takes into account the need to create lifetime neighbourhoods,

providing places where people of all ages can live and work. Therefore, proposals should consider how it can be adapted for different users and uses.

## **BUILDING REGULATIONS**

1.4.27 Building regulations should be considered from the early stage of a design process. Building Regulations approval will be required for all suburban residential developments and the majority of residential extensions & alterations, including fire safety, energy efficiency, sound and thermal insulation and the structural stability of an extension.

## **ENGAGING YOUR NEIGHBOURS**

1.4.28 It is important and recommended that you talk to your neighbours and anyone else who may be affected by your proposals at an early a stage as possible to properly consider how neighbouring amenity may be affected. This should occur before a planning application is submitted or when development occurs under Permitted Development. Responding to neighbours' concerns in a meaningful manner can help to develop an acceptable proposal.

## **SUBMITTING APPLICATIONS**

1.4.29 For information and guidance on the application process, including pre-applications<sup>15</sup>, Design and Access Statements (DAS) and the Validation Checklist<sup>16</sup>, please refer to Croydon Council's website and the Planning Portal<sup>17</sup>.

<sup>15</sup> <https://www.croydon.gov.uk/planningandregeneration/pre-application-meeting-service>.

<sup>16</sup> <https://www.croydon.gov.uk/planningandregeneration/makeapplication/validation-checklist>.

<sup>17</sup> Information about the planning process and relevant documents, policy and legislation can be found on the Planning Portal at: <https://www.planningportal.co.uk/>.



An aerial, isometric illustration of a suburban residential development. The scene shows a grid of streets with various types of buildings, including single-story houses and multi-story apartment blocks. Some buildings have flat roofs with green roofs, while others have gabled roofs. There are trees, lawns, and streetlights scattered throughout the development. A semi-transparent white rectangular box is overlaid in the center of the image, containing the chapter title in bold, orange-red capital letters.

# CHAPTER 2: SUBURBAN RESIDENTIAL DEVELOPMENT

# INTRODUCTION

## 2.1 SUBURBAN DEVELOPMENT

2.1.1 This section of the SPD is relevant to the delivery of new homes through conversion or redevelopment of existing properties or new housing built in rear gardens and back lands.

2.1.2 The Croydon Local Plan has identified that some existing residential areas have the capacity to accommodate growth without significant change to its character. In these locations, to accommodate the target for additional homes in the suburbs, new residential units may be created through the interventions described in Figures 2.1a – 2.1e.

2.1.3 These approaches to development are set out in Table 6.4 of the Croydon Local Plan and the supporting text. The guidance set out in this section responds to Policies DM10.1 – DM10.10 of the Croydon Local Plan regarding design and density, including ensuring growth is accommodated without significant change to the character of an area.



### CONVERSION

Figure 2.1a: The conversion or subdivision of a large buildings into multiple dwellings without any major alterations to the size of the building.



### ADDITION

Figure 2.1b: A rooftop addition to an existing development that provides new homes.



### IN-FILL INCLUDING PLOT SUBDIVISION

Figure 2.1c: The filling of gaps and left over spaces between existing properties in a scheme by Peter Barber Architects. Infilling may also include the subdivision of large plots of land into smaller parcels with a layout that complements the existing urban pattern. (Photo: Morley von Sternberg)



### REAR GARDEN DEVELOPMENT

Figure 2.1d: The construction of new buildings in rear gardens of existing properties in a design by Dallas–Pierce–Quintero that builds along the boundary wall. (Photo: David Butler)



### REGENERATION

Figure 2.1e: 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. The proposal alongside was designed by Proctor & Matthews Architects.

## 2.2 OVERARCHING DEVELOPMENT PRINCIPLES FOR SUBURBAN DEVELOPMENT

2.2.1 Developments in suburban locations seeking to deliver new homes will be expected to meet the overarching development principles below which support the strategic objectives and Strategic Policies SP2 and SP4 of the Croydon Local Plan:

- Provide the right mix of homes in the right location
- Improve or positively contribute to local character
- Minimise impact on neighbouring amenity as far as possible
- Safeguard for future development of neighbouring sites
- Embodiment environmentally sustainable development.



Figure 2.2a: Back land development providing family homes on a site to the rear of properties on Church Road, Upper Norwood.

# OPTIMISING SITES

## 2.3 DELIVERING THE RIGHT HOMES

### HOUSING MIX & DEVELOPMENT TYPE

2.3.1 Croydon requires, in Policy SP2.1 of the Croydon Local Plan, a mix of homes to cater to the evolving and growing population, and while many suburban sites present opportunities to deliver a mix of homes, the need to provide and protect family sized homes is set out in Policy DM1.1 of the Croydon Local Plan.

2.3.2 Policy SP2.7 sets a strategic target of 30% of new homes to have three or more bedrooms with Policy DM1 establishing how this will be achieved on specific sites of 10 or more units. Developments on sites under 10 units are also encouraged to deliver homes with three or more bedrooms. In some cases this is potentially at the expense of delivering a larger quantity of smaller 1 or 2 bedroom units if the site specifics are such.

2.3.3 Developments should be designed to ensure that family sized units:

- Where located above ground level, demonstrate the site constraints which prevent ground floor family sized units.
- Where located above ground level, include a directly accessible balcony or terrace, as well as access to shared outdoor amenity space with grassed areas appropriate for play. This shared outdoor amenity space should be easily accessible from the indoor communal space of a development (Refer to Section 2.34 for guidance).

2.3.4 Table 6.5 of the Croydon Local Plan lists the suitable development of various local

character types in the borough. Development should be in accordance with Policy DM10 and Table 6.5 of the Croydon Local Plan.

### EFFICIENT USE OF SITES

2.3.5 Development proposals should be designed to:

- Ensure they make the best use of the site. This may include the provision of higher density housing such as terraced houses and flats, rather than detached houses; and
- Where possible, seek to combine sites to create a larger development potential (Refer to Section 2.4 for guidance).

2.3.6 The Local Planning Authority will not support proposals which are considered to be an under-provision of a site. Applicants must not intentionally circumvent the affordable housing provision of the Croydon Local Plan by delivering 9 unit schemes where the site can accommodate the delivery of 10 or more units. A development proposal that seeks to deliver a scheme that could form part of a larger potential development on the same or adjoining land will be assessed as an application for the greater development potential.

## 2.4 ADJOINING SITES AND COMPREHENSIVE DEVELOPMENT

### COMBINING SITES

2.4.1 Where sites present the potential to be developed to achieve comprehensive development in conjunction with neighbouring plots, development proposals should seek to bring sites forward collaboratively.

2.4.2 By bringing neighbouring sites forward for development together, proposals have the opportunity to:

- Optimise the development potential of sites to provide more homes. The footprint of a development that spans two (2) sites is typically larger than the combined footprint of two (2) separate developments on neighbouring sites, providing an uplift in the potential number of homes. This may be achieved through additional heights and/or larger floorplates (Refer to Figure 2.4a).
- Reduce overhead and construction costs.
- Create a more holistic approach to development in the area, allowing a more resolved approach to character, issues of overlooking, site access and servicing.

2.4.3 Where combining sites would result in building across existing street-facing plot boundaries applicants should refer to Section 2.15 to avoid creating over-bearing developments that disrupt the rhythm of a street.



**PROTECTING FUTURE DEVELOPMENT POTENTIAL**

2.4.4 Development proposals must not prejudice the development potential of neighbouring sites, specifically in regards to access (Refer to Section 2.29 for guidance), daylight, sunlight and overlooking (Refer to Section 2.9 for guidance). Where applicable, proposals may be required to demonstrate how a potential development on a neighbouring site may come forward following the development of their site.

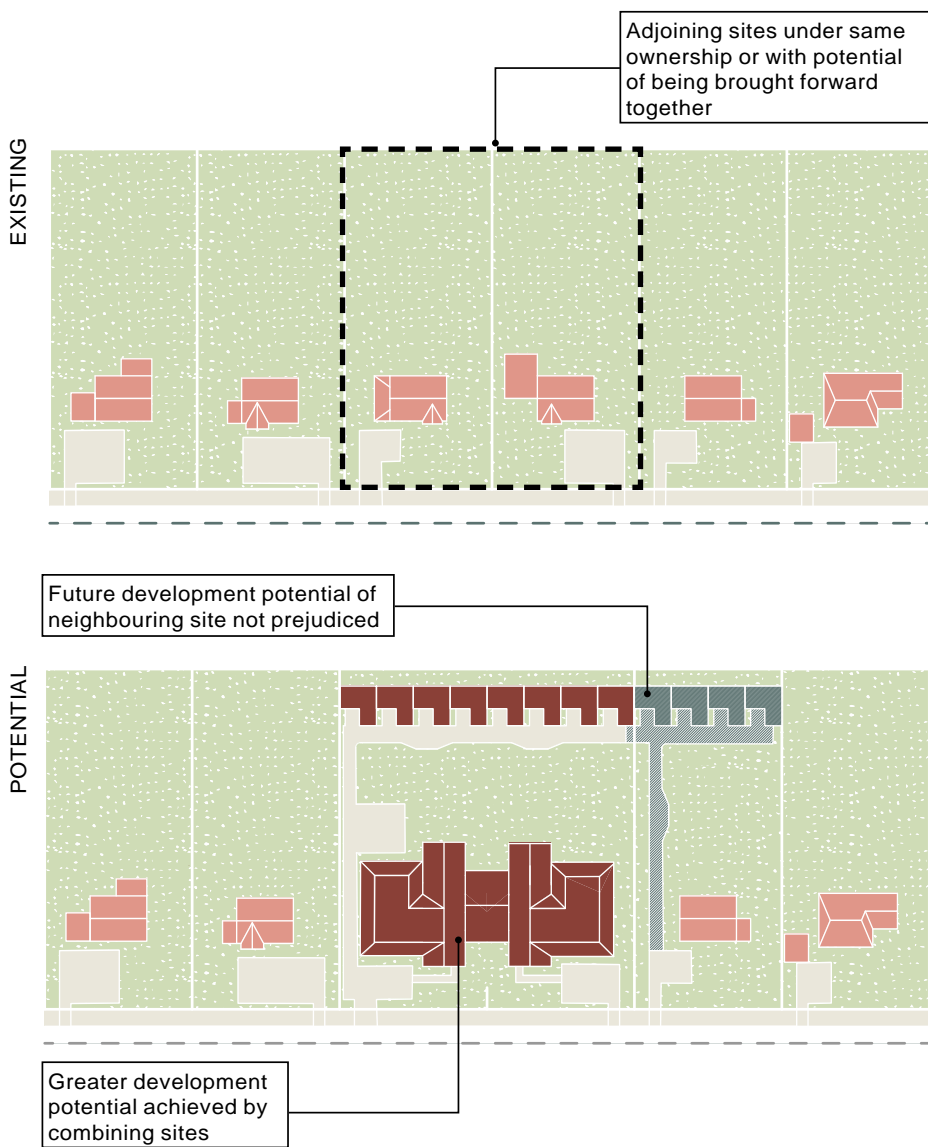


Figure 2.4a - Combining adjoining sites to provide greater development potential.

**2.5 CHANGE OF USE AND CONVERSIONS**

2.5.1 Suburban blocks with back lands, as well as spaces above shops, present opportunities for a change of use, dependent on Croydon Local Plan policies.

2.5.2 Where existing houses or spaces above shops are converted to provide new dwellings, consideration must be given to the design and layout to ensure awkward layouts and limited access to natural light is avoided. All new dwellings as a result of conversions must meet minimum space standards. Where spaces above shops which front busy roads are converted or developed into flats, bedrooms should generally be located away from the road.



Figure 2.5a: Oval Mews, before redevelopment with a change of use.



Figure 2.5b: Oval Mews, after redevelopment with a change of use by Chartwell Land & New Homes.

## 2.6 CONNECTIVITY

2.6.1 The growth of the suburban population means an increased demand on public transport services, resulting in a need to deliver increased public transport capacity and provision.

2.6.2 Whilst intensification may come forward gradually over time, there is the clear need for a holistic, forward-looking approach to infrastructure and supporting services. This should put people, and their health, at the centre of the design of our neighbourhoods, in line with TfL's Healthy Street Approach<sup>18</sup>. Croydon Council is committed to working with TfL and other service providers to ensure suburban growth is delivered in conjunction with adequate access to active and public transport facilities. The Croydon Local Plan, Infrastructure Delivery Plan and the London Plan<sup>19</sup> provide detail on this.

<sup>18</sup> Refer to <https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/healthy-streets>

2.6.3 On-site parking provision will be restricted in line with the evolving London Plan<sup>19</sup> maximum standards and minimal necessary car parking will be the starting point for all development proposals.

2.6.4 The borough will encourage lower parking provision than the maximum car parking standards set in both the current and draft new London Plan in locations that meet the following criteria and on a case by case basis:

- Site is within a controlled parking zone (or where one is under development);
- Site is within an area of moderate to good connectivity to the wider public transport network and the Growth Zone by public transport, walking and cycling (PTAL 4 and above);
- Site is in an area that will be subject to future public transport or walking and

cycling improvements as part of the Growth Zone delivery proposals or Mayor's Transport Strategy proposals that will result in it having moderate to good connectivity (PTAL 4 and above).

2.6.5 In areas of PTAL 4 or more or where there are areas of existing parking stress (Refer to Policy DM30(a) of the Croydon Local Plan), to make the development acceptable, the Council will require the development to be permit-free whereby residents will be restricted from applying for on-street parking permits through the use of legal S106 agreements where existing Controlled Parking Zone exists.

2.6.6 Appropriate disabled persons parking for Blue Badge holders will be provided in accordance with the London Plan<sup>19</sup>.

2.6.7 Parking spaces within communal car parking facilities should be leased rather than sold.



Figure 2.6a: Electric bikes allow easier commuting in hilly areas. (Photo: Road.cc)



Figure 2.6b: On-street shared cycle stores.



Figure 2.6c: Trams connecting into suburban locations.



Figure 2.6d: Bus routes connecting into suburban locations.

## SUSTAINABLE TRANSPORT FACILITIES

2.6.8 In order to realise the development potential and intensification of the suburbs, there is a need to improve the connectivity and public transport accessibility of these areas which can be delivered through new types of flexible bus, taxi-bus services and new cycle routes.

The following sustainable transport facilities and provision will need to be provided, where appropriate, for all new residential developments and will be necessary to enable an acceptable level of minimal parking provision:

- Electric vehicle charging infrastructure should be provided in accordance with London Plan<sup>19</sup> standards;
- A Parking Design & Management Plan needs to be submitted for all applications which include car parking provision setting out how the car parking will be designed and managed;
- A Travel Plan Statement will be required for all developments that the Council considers would generate significant amounts of movements in relation to the existing context. This will be judged on a case by case basis considering factors such as existing parking stress, PTAL, adjacent site uses and cumulative impact of development in an area. The statement should respond to the particular concerns highlighted by the Council, outlining how the residents will be informed about the sustainable travel options in their area and how and why there are restrictions on their parking provision;
- Active transport routes, including better connections for pedestrians and cycle lanes. Particular emphasis will be placed on the use of electric bikes which present a good solution to hills. The use of both electric and standard bikes can greatly increase access to public transport; in the time taken to walk to a bus stop or station (built into TfL's PTAL model) a far greater distance can be cycled, potentially transforming PTALs;
- Secure cycle parking provision in accordance with the London Plan<sup>19</sup>, including the provision of charging points for electric bicycles (e-bikes). Consideration of parking for cargo bikes for family homes is strongly encouraged;
- Car Club parking space provision should be in line with the requirements in Table 10.1 of the Croydon Local Plan. Where suburban residential developments present an opportunity to provide additional car club spaces or membership to nearby schemes, the Council will encourage this.
- Future bus services - On demand bus services are expected to start operating in suburban areas that currently cannot support dedicated TfL bus routes. With future transport options<sup>20</sup>, it is anticipated that connected and autonomous<sup>21</sup> (also known as driverless) bus services will be operating in suburban locations in a few decades, as well as an increased number of traditional bus services. The provision of these services will strengthen the existing transport network and allow areas lacking in access to public transport to be better connected.

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<sup>19</sup> As amended from time to time.

<sup>20</sup> Refer to: [https://www.london.gov.uk/sites/default/files/future\\_transport\\_report\\_-\\_final.pdf](https://www.london.gov.uk/sites/default/files/future_transport_report_-_final.pdf) for further information.

<sup>21</sup> Refer to: <https://www.smmmt.co.uk/2018/05/worlds-first-autonomous-bus-service-begins/> for further information.



Figure 2.6e: Development of a larger scale designed by Peter Barber Architects is successfully integrated into the context through a stepped form on the top floor and careful choice of high-quality materials that respond to local character. (Photo: Morley von Sternberg)



Figure 2.6f: A development of flats designed by Haworth Tompkins that uses the form of the balconies to add interest to an otherwise simple but well-designed facade giving character to a contemporary proposal. (Photo: Philip Vile)

# CHARACTER

## 2.7 DEFINING CHARACTER

**CHARACTER IS IDENTIFIED BY THE GROUP OF QUALITIES THAT MAKE IT DISTINCTIVE, INCLUDING THE COLLECTIVE APPEARANCE OF BUILDINGS, STREETS OR LOCAL AREAS AND CAN BE BOTH HISTORIC AND CONTEMPORARY. THIS MAY INCLUDE STREET LAYOUTS, BUILDING FORMS AND POSITIONING, LANDSCAPING, MATERIALS AND ARCHITECTURAL DETAILS.**

2.7.1 The built character of an area is not defined by the people who live there, but rather the physical characteristics that it is composed of. Character can change over time and it should be acknowledged that well-designed proposals can have a positive effect on an area. This means that new types of dwelling can be integrated into an existing community.

2.7.2 Development does not need to replicate existing qualities, but should seek to respond to character through one of the approaches outlined in Section 2.8. Development should seek to evolve the character in a manner that enhances the neighbourhoods as enjoyable places to live, work and play. This can be achieved through pursuing development that references and reinforces existing architectural styles or introduces new well-designed architectural styles that add interest to the area. This does not exclude increased building sizes.

2.7.3 Each of Croydon's 16 Places has a distinct character. Applicants should consider the area they are working in and for more detail on the character of the place refer to

the Borough Character Appraisal<sup>22</sup>. Some areas within Croydon are defined by the predominance of certain types of homes; the physical characteristics that help to define different types of housing are detailed in the Borough's Character Typology document<sup>23</sup>. Physical constraints that can inform the character of an area include, but are not limited to:

- The layout of streets and the relationship of built form to the street and other buildings;
- The predominance and/or design of landscaping along the street and within plots, including hardstanding;
- The layout of plots and how this informs the streetscene, including boundaries and entrances;
- The form of building footprints and the shape of roofs;
- Materials used on buildings, boundaries and hardstanding;
- Size, style and positioning of windows, architectural details & features.

2.7.4 Applicants should undertake contextual analysis that identifies the positive physical characteristics of an area and informs the approach to character for a development proposal as set out in Section 2.8. An example of contextual analysis is provided in Figure 2.7a.

2.7.5 There are many areas within the borough that have predominant physical characteristics; it is expected that through growth in

suburban locations that some of the physical characteristics of these areas will evolve to accommodate the homes we need. Whilst physical characteristics may evolve, the sense of a place that defines its character should be enhanced through development as outlined in Policies DM10.1 – DM10.10 of the Croydon Local Plan. For the Areas of Focused Intensification, greater flexibility in responding to existing character will be allowed to achieve higher densities across the areas as per Policy DM10.11. However, it is expected that developments should still demonstrate a clear approach to character in line with the guidance in Section 2.8 and that collectively developments in these area will contribute to the gradual change in character.

<sup>22</sup> A document which identifies and analyses the character of the Places in Croydon. Available at: <https://www.croydon.gov.uk/sites/default/files/articles/downloads/Borough%20Character%20Appraisal.pdf>

<sup>23</sup> A study of the different types of housing in Croydon, based on a range of criteria and characteristics. This document supports the Borough Character Appraisal by giving a typological explanation of housing in Croydon. Available in the Urban Design, Local Character and Heritage section of the local plan evidence at: <https://www.croydon.gov.uk/planningandregeneration/framework>.



Figure 2.7a - Contextual analysis of local character that has informed the appearance of a proposal. This figure demonstrates one possible approach and such analysis should allow for creative responses and does not necessarily require existing forms, materials and details to be replicated. (Images: MATAArchitects)

## 2.8 APPROACHES TO CHARACTER

2.8.1 Development proposals should identify characteristics of the area and how they have been responded to, in accordance with Policy DM10 of the Croydon Local Plan. Crucially, respond does not mean replicate and allows for interpretation of existing character to create something new that enhances the area and its character. In developing an approach to character, applicants should refer to Section 2.7 of this guide to help identify the existing character.

2.8.2 The following three (3) broad approaches to how to respond to local character in the design of new development have been identified. Applicants should seek to follow one of the approaches below and will be expected to justify why the particular approach that they take has been employed, and how it is manifested in the design of the proposal.

### INNOVATIVE AND ORIGINAL

2.8.3 Schemes should use unique solutions that respond to the context of the site through contemporary use of form, materiality and detailing. This may be different from the predominant local character, but must respect existing character and not create any negative impacts on it, and will only be acceptable where there is a demonstration of high-quality design in the proposal. As per the NPPF, *innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles should not be stifled*. Areas of an inconsistent character can present a compelling opportunity to pursue an innovative and original approach, as unique additions to such an area may positively evolve its character. However, this does not limit the innovative and original approach to areas with inconsistent character.



Figure 2.8a: Eagle Hill - example of an Innovative and Original approach designed by Coffey Architects. Use of contemporary form and materials carefully arranged on a back land site (formerly occupied by garages) to create a visual connection with the street. The form is designed to allow residents to look onto their own courtyards rather than out to neighbouring gardens, making use of the sloping site to maximise the delivery of units. Refer section 2.42 for more details on this case study.



## CONTEMPORARY REINTERPRETATION

2.8.4 Schemes could seek to create a development that reads as contemporary whilst working with traditional character forms and/or features and materials predominant in an area. When pursuing a contemporary reinterpretation approach, it is often possible to successfully integrate contemporary details into traditional forms or traditional detailing into contemporary forms. Contemporary reinterpretation should not allow for the poor marrying of architectural styles, or poorly applied features or pastiche.



Figure 2.8b: Coombe Road - an example of a Contemporary Reinterpretation approach designed by Common Ground Architects. The massing and materials of the proposal refer to the surrounding buildings, but distinguishes itself through the folded form of the roof and contemporary detailing. The proposal delivers several new homes across two buildings.

## SYMPATHETIC AND FAITHFUL

2.8.5 Schemes should closely relate to the existing surrounding typologies by pursuing a similar form, style, materials and detailing. Proposals which adopt this approach and create poor-quality copies of the characteristic architecture of an area will not be acceptable. It can be challenging to be sympathetic and faithful where a proposal departs from the predominant density or scale of buildings in the area.



Figure 2.8c: Oval Mews - an example of a Sympathetic and Faithful approach in this development by Chartwell Land & New Homes. Attention to detail in the selection of materials, choice of windows and proportions of the proposal. The new development delivers several new homes; refer section 2.44 for more details on this case study.

# MASSING

## 2.9 RELATIONSHIP BETWEEN BUILDINGS

### ACCESS TO DAYLIGHT & SUNLIGHT

2.9.1 When considering the relationship with other built form, whether proposed or existing, applicants should ensure adequate daylight and sunlight that is appropriate for future residents, and that there is not unreasonable loss of light for neighbours.

2.9.2 The scale of development covered by this guide will not usually require daylight and sunlight testing, however applicants are advised to consult the BRE guidance<sup>24</sup> on good practice for access to natural light. Where this guidance would inhibit the efficient use of a site, there may be flexibility in the application of these standards. This will only be applicable to constrained sites and may not be used to justify substandard design of proposals. Flexibility in the application of BRE standards will only be acceptable where a proposal has a compelling design that mitigates daylight and sunlight issues.

2.9.3 Where there is concern that the orientation of the proposal and proximity to neighbouring buildings will limit access to natural light within the proposed and/or neighbouring dwellings, proposals will be required to

<sup>24</sup> Guidance is available via the 'Site Layout Planning for Daylight and Sunlight: A guide to good practice' (2011).

provide a daylight and sunlight analysis study<sup>25</sup>. 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 un-neighbourly windows place undue restraints on the development, and as such the light and outlook they receive will not receive significant protection.

2.9.4 New dwellings should maximise access to daylight and sunlight, including consideration for:

- a. Avoiding creating single aspect dwellings, particularly if north-facing.
- b. Orientation and layout of proposals to allow a minimum of one room in every dwelling to receive direct sunlight at some point within the day.
- c. Well-positioned windows in relation to neighbouring built form.
- d. Well-positioned windows in relation to room layout.
- e. Well-considered room layouts that are not overly deep or awkwardly shaped that limit the opportunity for access to natural light.
- f. Dual aspect rooms with windows on two (2) external walls to allow light from different angles and greater opportunity for direct sunlight,

<sup>25</sup> Tests required for a daylight and sunlight analysis study are set out in the Building Research Establishment (BRE) document 'Site Layout Planning for Daylight and Sunlight: A guide to good practice' (2011).

particularly where rooms are north facing.

- g. Large areas of glazing that maximise light, generally with a window to floor ratio of no less than 15%. Where glazing is within 60° of due south, consideration should be given to heat gain from sunlight as a result of large areas of glazing.
- h. The use of courtyard arrangements in constrained sites which can provide outlook and access to light.
- i. The use of rooflights. When located on a flat roof, not allowing a view out, they should be used to supplement another window or skylight that allow some form of outlook.

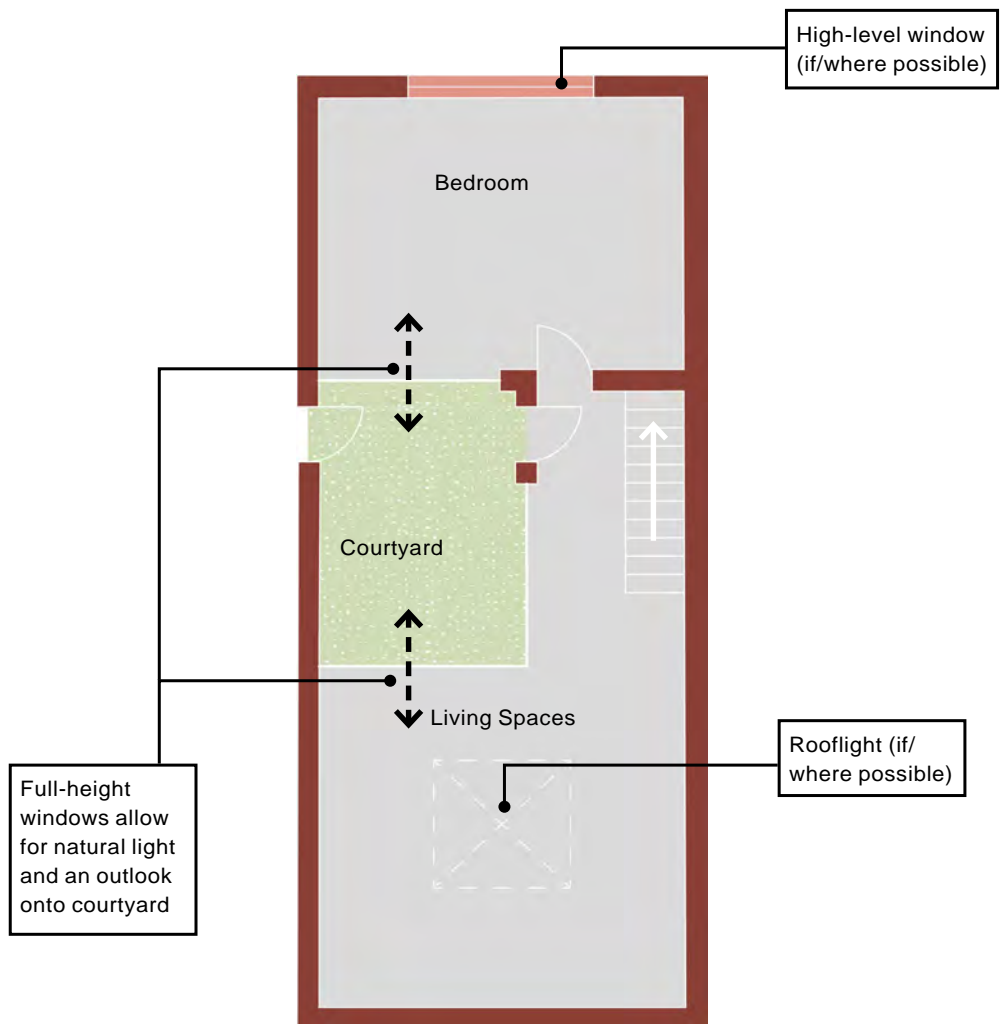


Figure 2.9a: Diagram illustrating solutions to access natural light on a constrained site that limits externally facing windows.



Figure 2.9b: The interior of a house designed by Dallas–Pierce–Quintero on an infill/backland site that uses rooflights and a courtyard to provide dual aspect rooms with access to natural light on a constrained site. (Photo: Tom Gildon)

## FRONT TO FRONT DISTANCES

2.9.5 A front to front separation is considered to be the distance between the front elevation of two properties. The front is typically identified as the elevation that faces a public highway or shared access route.

2.9.6 The relationship between the front elevation of a proposal and a neighbouring property (whether the neighbouring property is existing or part of the same development) should be determined by the following factors:

- Design of the streetscene (the look and feel of the place, informed by scale, form and material treatment); and
- Access to daylight & sunlight.

2.9.7 In suburban locations, the separation distance between front elevations should generally be no smaller than the height of the developments that are facing each other. For example, where a 6m high front elevation faces another front elevation, there should be a separation of at least 6m (Refer to Figures 2.9c and 2.9d)

2.9.8 Where sites are constrained, such as back lands and rear gardens, and such separation distances are difficult to achieve, the massing of a proposal should be stepped backwards and forwards so that these distances can be achieved at intervals, with tighter areas in between.

2.9.9 Where there is a concern that a development would appear overbearing to a neighbouring property across the street and/or create a poorly designed streetscene, they will not be supported. This will be judged on a case by case basis in light of this guidance and Policy DM10 of the Croydon Local Plan.



Figure 2.9c: A new suburban street where separation between front elevations is equal to the height of the elevations facing the street.



Figure 2.9d: A mews street where separation between front elevations is equal to the height of the elevations facing the street.

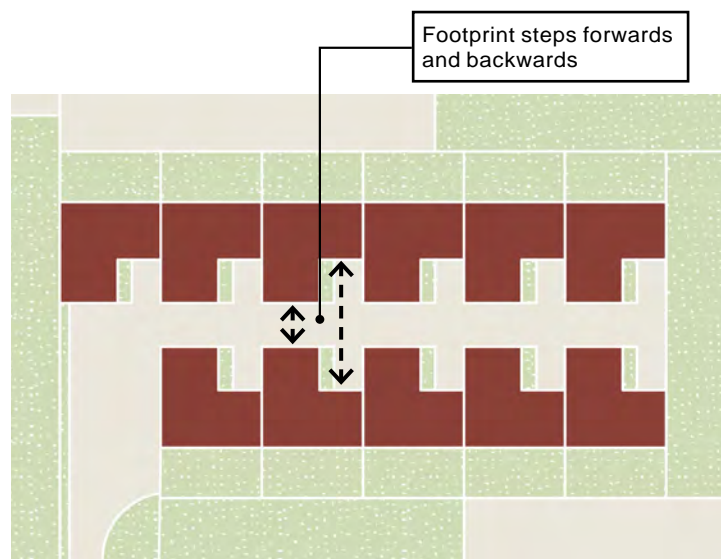


Figure 2.9e: Stepping of massing to achieve acceptable front to front separation distances at intervals, as per guidance Paragraph 2.9.8.

## BACK TO BACK DISTANCES

2.9.10 The relationship between the rear elevations of a proposal and existing or other new developments is primarily concerned with maintaining privacy. Whilst the design of suburban streets typically limits direct overlooking through separation distances, an amount of overlooking is a fact of living in the suburbs and can be beneficial in providing natural surveillance. It is inevitable that development and the evolution of the suburbs will result in an increase in overlooking as well as impact on outlook from neighbouring properties, however careful design can help to mitigate this.

2.9.11 Back to back distances between habitable rooms should be managed through acceptable distances as described in Figure 2.9f which should provide sufficient privacy to existing and new residents.

2.9.12 Direct overlooking into circulation spaces, such as entrance halls and stair wells, utility rooms and bathrooms is usually acceptable. Bathroom windows should be obscure glazed or screened for privacy.

2.9.13 Separation distance from a balcony should be the same as the distances in Figure 2.9f. This should be measured from the edge of the balcony.

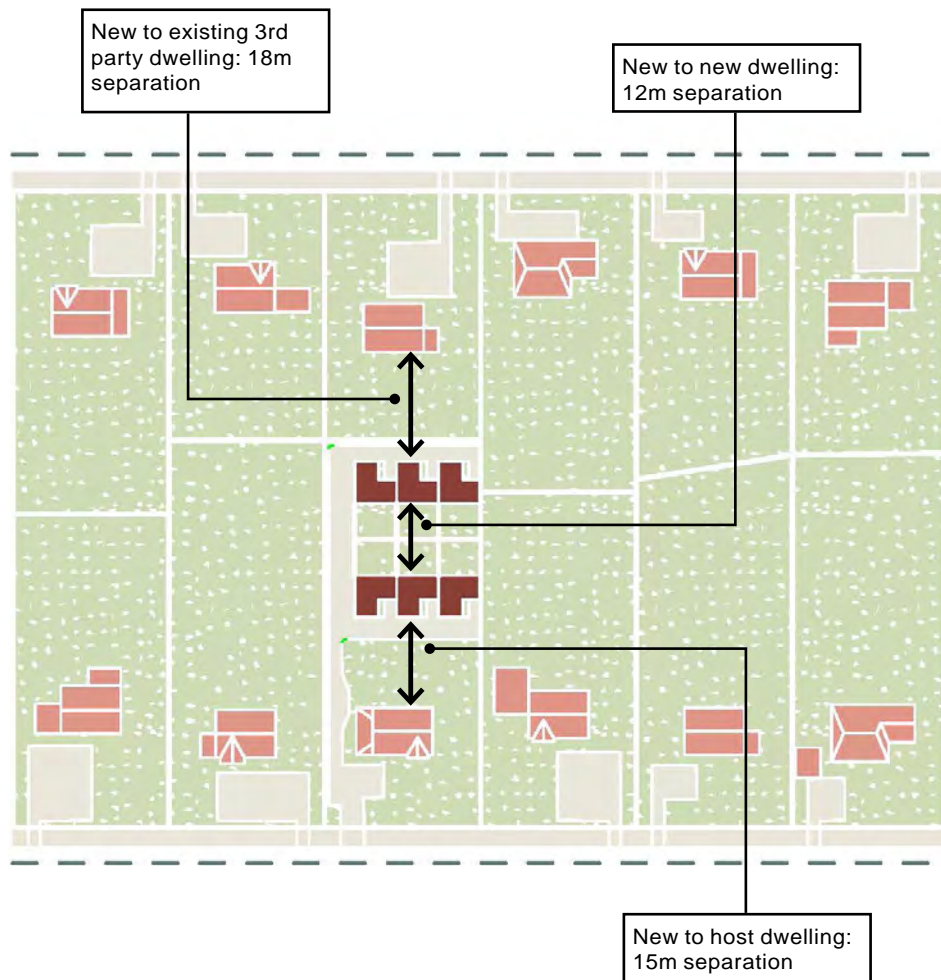


Figure 2.9f: Overlooking distances concerning solely new development reflects the establishment of a new condition associated with new residences, rather than a loss of existing amenity through a new development.

## **OBLIQUE OVERLOOKING, ORIENTATION & SCREENING**

2.9.14 The massing of a proposal, including the orientation of the facade, can minimise issues of overlooking between rear elevations.

2.9.15 Windows on rear elevations that do not directly face each other, i.e. are at angles to one another and would provide oblique or obscured views, are not considered to result in direct overlooking. As such separation distances may be reduced. The acceptability of this will be assessed on a case by case basis.

2.9.16 Examples for orientation to minimize overlooking include:

- Developing a built form, such as a courtyard or stepping footprint that allows the development to be inward looking.
- Developing a built form that directs views away from neighbouring dwellings.

2.9.17 Where acceptable separation distances cannot be achieved due to site constraints, devices may be used to mitigate direct overlooking as per the following and Figure 2.9g:

- External panels, perforated screens, louvres, frosting and other methods used to obscure views will be acceptable where there are no alternative solutions (such as massing and orientation). Screening in these forms must be integrated with the building design and will not be acceptable where it appears to add clutter and conflicts with the appearance of the proposal.
- Projecting, oriel or angled windows that direct views will only be acceptable where they are part of a compelling design proposal and should generally provide an area of glazing that allows sufficient natural light.

- Where required, the staggering of windows to allow only oblique views between habitable rooms may be acceptable.
- Landscaping treatments often provide attractive methods for resolving overlooking without the need for architectural devices and will be considered on a case by case basis. This could include the planting of mature trees and hedges as part of a new proposal. Where such planting would not impact the neighbouring amenity and there is consideration for future maintenance, this approach may be encouraged.

2.9.18 The acceptability of the use of any of these devices to overcome issues of overlooking and insufficient separation distances will be judged on a case by case basis. This will include consideration for an overbearing appearance, quality of design and unreasonable loss of natural light to neighbouring properties.

2.9.19 Where projecting balconies are provided, there can be a need to screen the sides of balconies. This can be achieved through the following methods:

- Perforated screens or louvres. They will only be acceptable where there is a high level of investment in their design so that they are integrated within the language and materiality of the proposal. Where they appear to add clutter or dissonate with the design of the building they will not be acceptable.
- Hit and miss brickwork or stone that responds to the language and materiality of the proposal.
- The colour and appearance of frosted glazing is uncharacteristic of the suburbs and will generally not be acceptable unless it is part of a compelling design proposal.

## **OVERLOOKING PRIVATE OUTDOOR AMENITY SPACES**

2.9.20 In certain circumstances in the borough where overlooking to a neighbouring garden is not present, this may be introduced as development occurs. While a greater level of protection will be afforded to the first 10m of a neighbouring garden (in line with Policy DM10.6 of the Croydon Local Plan), the remainder of the garden may be overlooked from neighbouring developments provided it does not prejudice development.

2.9.21 In most circumstances, the back to back distances provided in paragraph 2.9.11 are considered to provide significant separation to ensure the first 10m of garden in a third party or host dwelling are protected from direct overlooking where the rear of properties face each other.

2.9.22 Where a development may result in overlooking to the first 10m of a neighboring garden, the design should be such that only obscured, diagonal or oblique views are possible which would not be considered to be direct overlooking. This may require the introduction of architectural devices as described in paragraph 2.9.17.

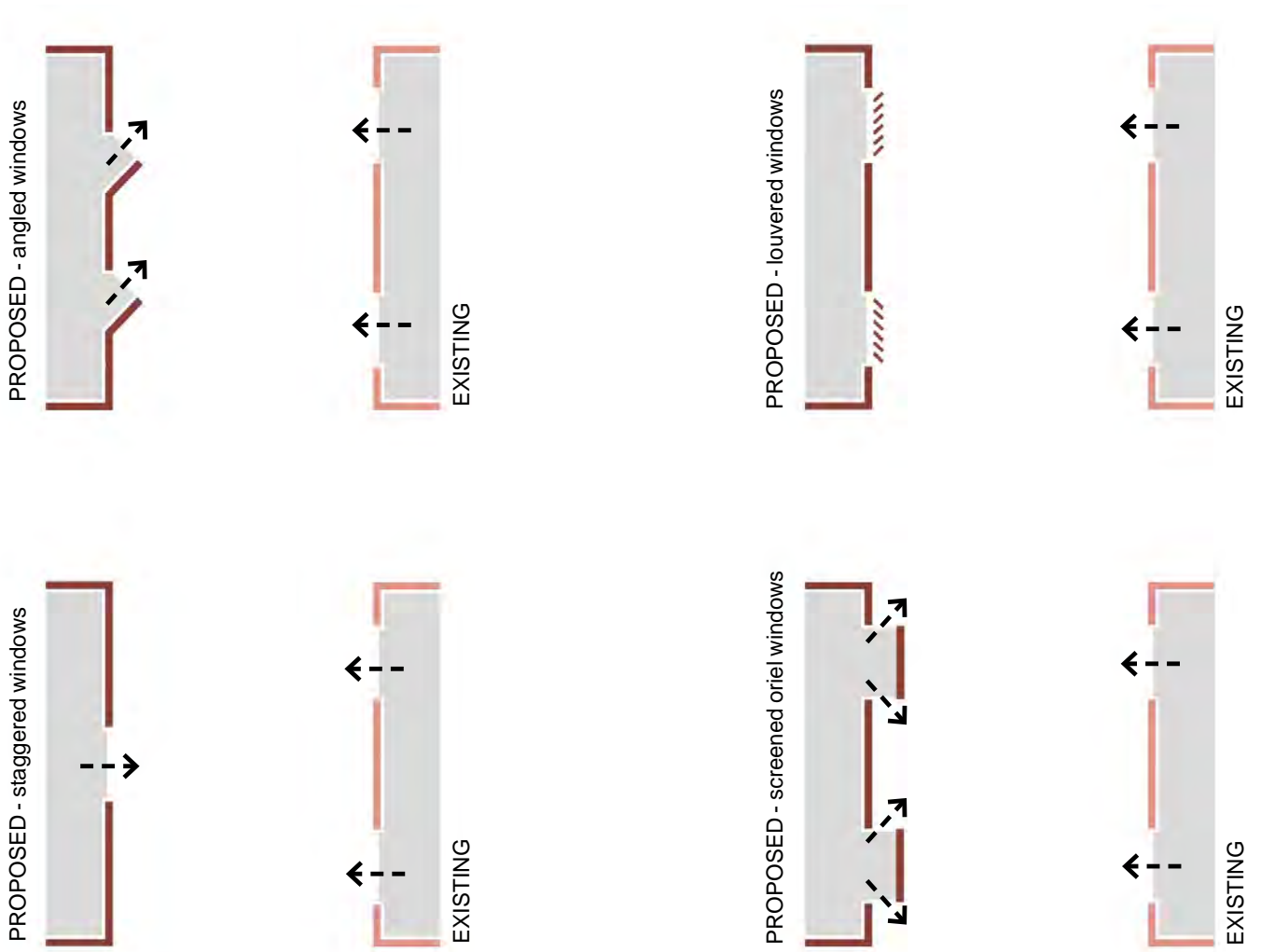


Figure 2.9g: Methods for resolving overlooking where necessitated by reduced separation distances.



Figure 2.9h: A development of two houses in a back land that is orientated around a triangular courtyard between the new houses. The design by vPPR Architects provides a form that responds to the site constraints and windows looking into an outdoor amenity space between the new houses, avoiding overlooking to neighbouring properties.

## 2.10 HEIGHTS OF DEVELOPMENTS FACING ONTO THE STREET

2.10.1 The Croydon Local Plan states that buildings across the borough should generally be of at least three (3) storeys. Three (3) storeys may be accommodated by employing the following methods based on the context outlined in Figures 2.10c, 2.10d, 2.10e and 2.10f. Such changes in height along a street already occur across the borough, and as such developments do not necessarily need to step down in height towards neighbouring buildings of a lesser height.

2.10.2 DM10.1 of the Croydon Local Plan recommends a minimum of 3 storeys, as such where suburban contexts allow for additional accommodation in a roof space or basement these should be afforded as follows:

- Where a design includes a roof space in addition to three full floors, it is then possible that this space is used for accommodation; this may be within the eaves or in set-back roof form.
- Where a basement is partially concealed and not fully visible from the street, there is scope for accommodation on an additional lower level as this will not be read as full storey in the streetscene.



Figure 2.10a: A development of 3 storeys containing flats sits next to a bungalow and does not appear overbearing.



Figure 2.10b: A change in height along a suburban street adds to the character and feel of the area.





Figure 2.10c: Where surrounding buildings are predominantly detached dwellings of two (2) or more storeys, new developments may be three (3) storeys with an additional floor contained within the roof space or set back from the building envelope below.



Figure 2.10d: Where surrounding buildings are predominantly single storey, new development should seek to accommodate a third storey within the roof space.



Figure 2.10e: Where surrounding buildings are semi-detached homes in a planned estate, new developments should seek to accommodate a full third storey partially contained within the roof space to ensure the characteristic scale of the buildings along the street is maintained.



Figure 2.10f: The addition of a third storey within terraced houses will generally only be through accommodation within the roof. The acceptability of this will be based on the merit of design and the impact on street scene, given the consistent nature of continuous eaves and roof heights. A terraced house on a corner plot may seek to provide a additional full storey.

## 2.11 FORM OF PROJECTIONS EXTENDING BEYOND REAR BUILDING LINES

2.11.1 Where a development projects beyond a rear building line, the height and footprint of the projection does not necessarily need to be lower or narrower, provided the guidance on relationship to boundaries (Refer to Section 2.16) and overlooking (Refer to Section 2.9) is followed. It should be demonstrated that there would be no unreasonable impact on neighbouring amenity. Where it is necessary to mitigate impact on neighbouring amenity, the projection beyond the rear building line may need to step down in height and width, to meet

the guidance below:

- It follows the 45 degrees rule demonstrated in Figure 2.11b and 2.11c. In exceptional circumstances, where orientation, topography, landscaping and neighbouring land uses allow, there may be scope for a depth beyond 45 degrees.
- The flank wall is designed to minimise visual intrusion where visible from neighbouring properties.

2.11.2 Applicants should also refer to the guidance on Daylight and Sunlight (Refer to Section 2.9), where there would be unreasonable impact on neighbouring access to natural light, the depth of a projection beyond the rear building line

should be reduced. The design of a flank wall visible from neighbouring properties should be carefully designed to minimise visual intrusion.

2.11.3 Where stepping the height and width of a building, care should be taken as a stepping form can dilute the massing and architectural merit of a proposal. This in itself may draw more attention to the proposal through complicating form. Where stepping would overly complicate the form and create more visual intrusion on neighbouring amenity as demonstrated in Proposal 3 on pages 44 - 45, no stepping should be introduced and an overall smaller footprint that does not require stepping may need to be provided.



Figure 2.11a: A proposal designed by MATA Architects that steps in from the boundary and down in height where it extends beyond the rear of the neighbouring properties.

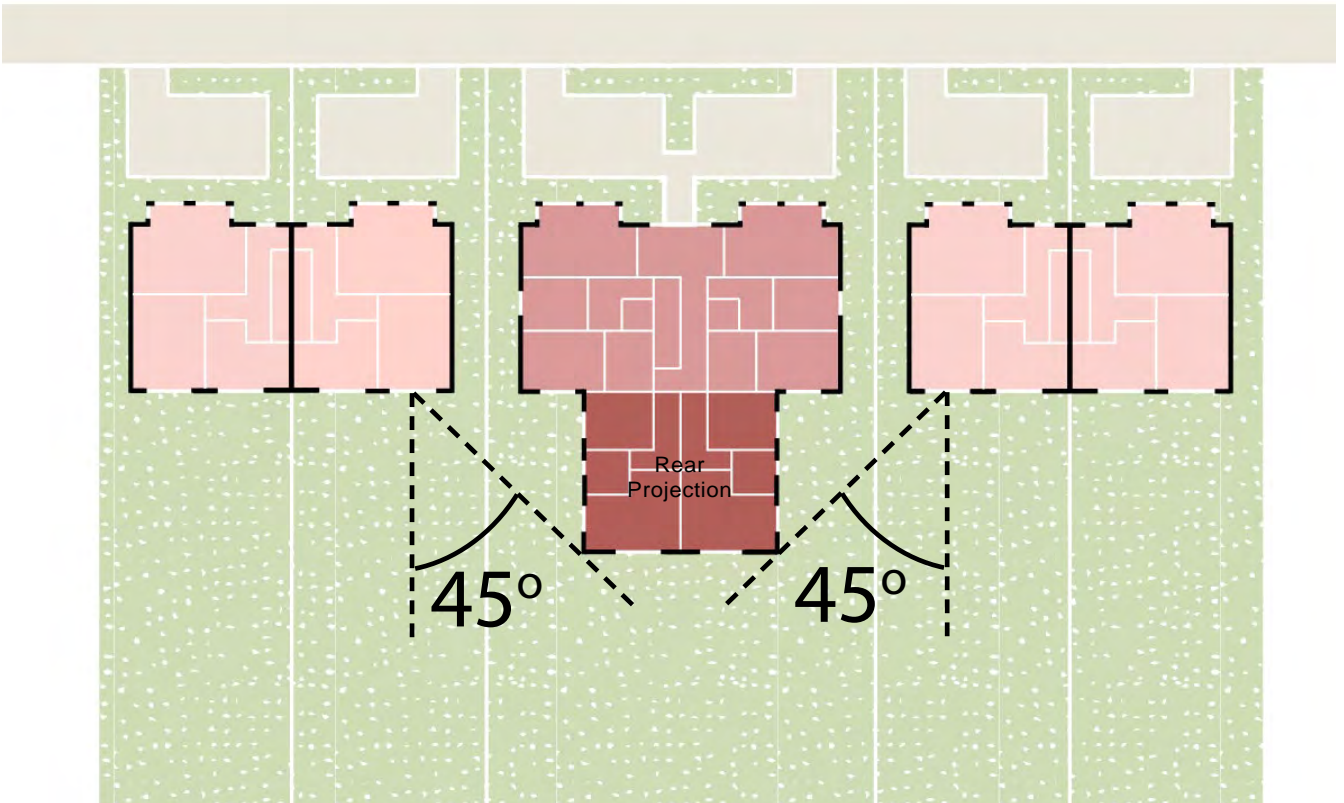


Figure 2.11b: Depth of projection no greater than 45 degrees as measured from the middle of the window of the closest ground floor habitable room on the rear wall of the main neighbouring property on both sides.

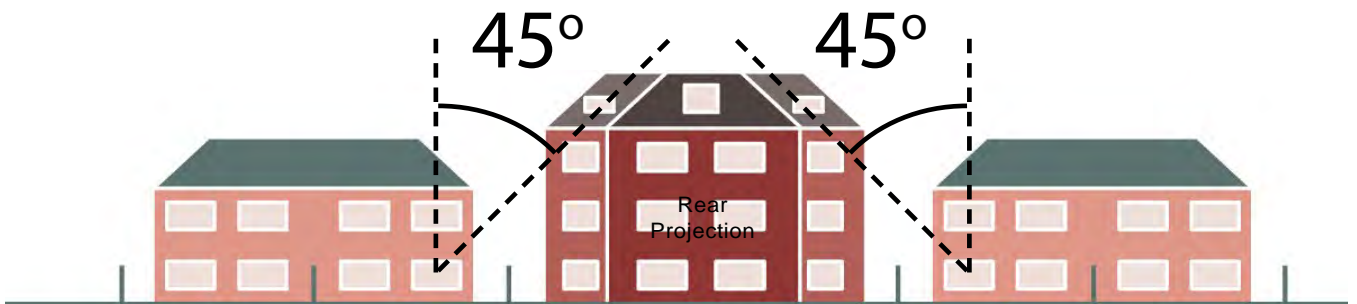


Figure 2.11c: Height of projection beyond the rear of neighbouring properties is no greater than 45 degrees as measured from the middle of the window of the closest ground floor habitable room on the rear wall of the main neighbouring property on both sides.

# APPLYING 45° RULE & ASSESMENT OF POTENTIAL BUILT FORM

Existing:



Figure 2.11d: Existing plan view.



Figure 2.11e: Existing outlook from neighbour's kitchen window.

## Proposal 1 - Acceptable

Simple architectural form that meets 45° rule (Refer to guidance 2.11).



Figure 2.11h: Proposal 1 plan view.



Figure 2.11i: Apparent depth of Proposal 1 limited by 45° rule.

## Proposal 2 - Acceptable

Simple architectural form that meets 45° rule (Refer to guidance 2.11) with stepped footprint to provide additional floorspace.



Figure 2.11j: Proposal 2 plan view.



Figure 2.11m: Apparent depth of Proposal 2 limited by 45° rule.

## Proposal 3 - Unacceptable

Incoherent form that meets 45° rule (Refer to guidance 2.11) but results in a complicated appearance which lacks design merit.



Figure 2.11p: Proposal 3 plan view.



Figure 2.11q: Apparent depth of Proposal 3 limited by 45° rule.

*Note: Figures 2.11i, m & q - impact is controlled by the 45° rule which dictates that a proposal appears at a similar depth when viewed from the neighbour's kitchen window regardless of form.*

Note: Figures 2.11j, n & r - impact from the neighbouring garden varies depending on the form of the proposal.



Figure 2.11f: Existing view from neighbour's garden.



Figure 2.11g: Existing aerial view.



Figure 2.11j: Architecturally coherent appearance of Proposal 1 when viewed from neighbour's garden.



Figure 2.11k: Aerial view for Proposal 1 demonstrating a coherent form.



Figure 2.11n: Architecturally coherent appearance of Proposal 2 when viewed from neighbour's garden.



Figure 2.11o: Aerial view for Proposal 2 demonstrating a coherent form.



Figure 2.11r: Architecturally incoherent appearance of Proposal 3 when viewed from neighbour's garden.



Figure 2.11s: Aerial view for Proposal 3 demonstrating an incoherent form.

## 2.12 FORM OF DEVELOPMENTS IN REAR GARDEN SITES

2.12.1 Where a development is proposed within a rear garden, including redevelopment of a garage to the rear of a property, it should be subservient to accord with Policy DM10.1 of the Croydon Local Plan. Subservience can be achieved through proposals of either a lower height or articulated massing dependant on the context and as follows:

- i. If any part of the proposed development would be within 18m of the rear wall of any neighbouring dwelling, the proposal should be of a lower height. This may be best achieved by being 1 storey lower than the neighbouring dwelling, however accommodation may be provided within roofspace (Refer to Figure 2.12a).
- ii. Where no part of the proposed development would be within 18m of the rear wall of the host or any neighbouring dwelling, the proposal may be of the same number of storeys of the predominant building height in the area (Refer to Figure 2.12b) provided the footprint and/or articulated form helps achieve a massing that appears subservient to the existing dwellings.

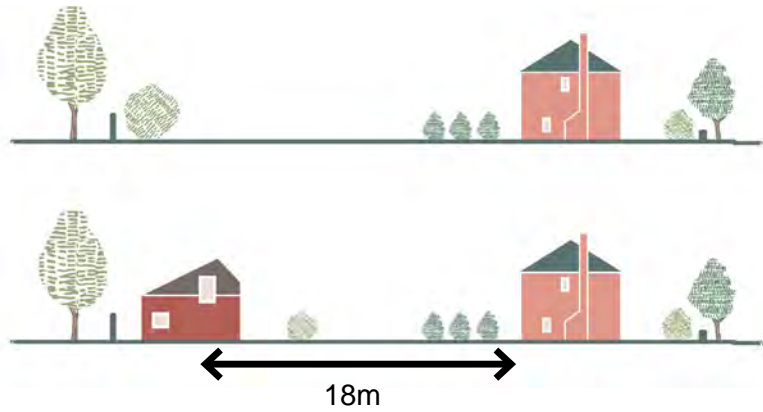


Figure 2.12a: Height of rear garden development is lower than the neighbouring dwelling where any part of the development is within 18m of the rear wall of the neighbouring property, however accommodation is provided in the roof space.

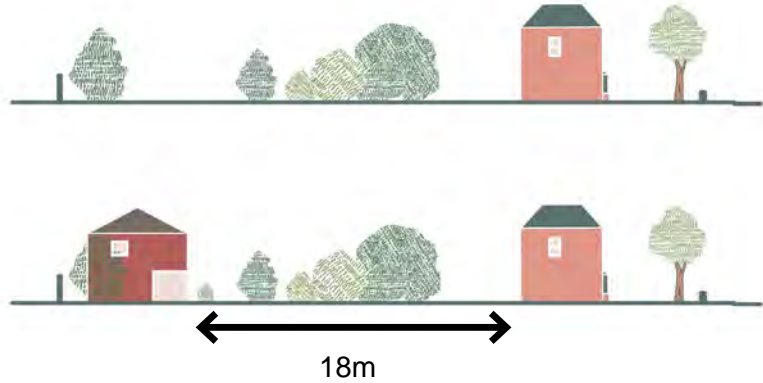


Figure 2.12b: Height of rear garden development may be equivalent to that of the neighbouring property where no part of the development is within 18m of the rear wall of the neighbouring property.



Figure 2.12c: A rear garden development that is within 18m of another dwelling that has a height that is subservient to the surrounding dwellings.

## 2.13 FORM OF DEVELOPMENTS ON BACK LAND SITES (INCLUDING BLOCKS OF GARAGES)

2.13.1 Back land sites and blocks of garages tend to be of a size to accommodate developments of a larger scale. The height of back land development should generally be no greater than the predominant surrounding buildings. If the development introduces a bigger built form to achieve 3 storeys as per Policy DM10.1 of the Croydon Local Plan, it can be advisable to step the height and/or footprint such that the proposal respects the scale, height, massing and density of the context in line with Policy DM10.1c. Stepping the height and/or footprint of a proposal can help to retain a sense of openness when viewed from neighbouring properties (Refer to Figure 2.13a and 2.13b).

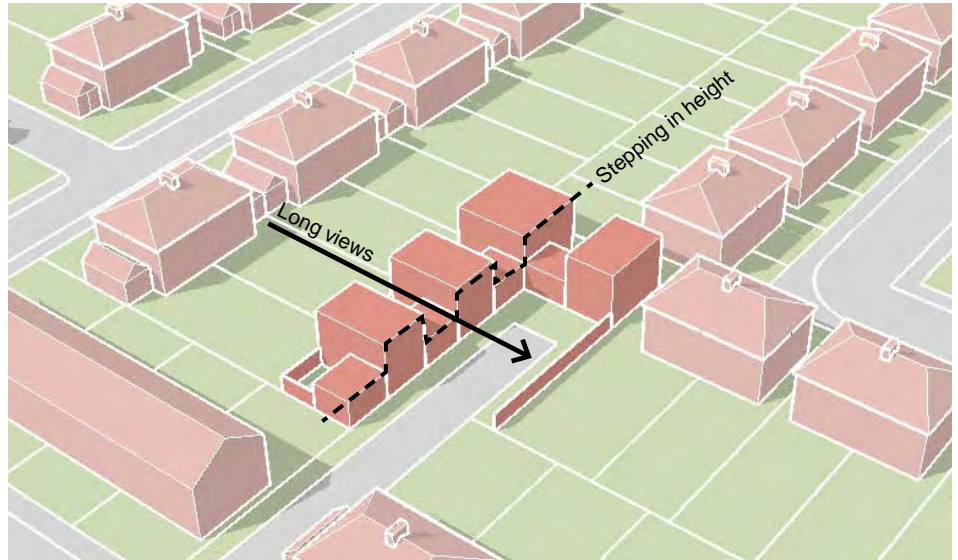


Figure 2.13a: Proposal for a back land site - height stepped to maintain sense of openness in neighbouring gardens and within the development itself.



Figure 2.13b: Visual of a proposal for a back land development by Coffey Architects where the height has been stepped to maintain sense of openness.



Figure 2.13c: A Brick by Brick proposal for a back land development designed by Stitch Studio. The proposal varies in height to respond to the context. Refer to guidance 2.13.





Figure 2.13d: A development of flats that faces onto the Croham Road is 4 storeys tall, with 1 floor contained with the roof. The development is formed of blocks that refer to the scale of dwellings along the street with recessed linking elements. Refer to guidance 2.10 and 2.15.

## 2.14 FORM OF DEVELOPMENTS ON CORNER PLOTS

2.14.1 By working with the dual aspect and prominent townscape position, proposals for the development of corner plots should seek to accommodate additional height and depth as marker points within the townscape.

2.14.2 Redevelopment of corner plots to provide new dwellings, including extensions or conversions:

- Should seek to include an (1) additional storey to the 3 storeys recommended in the Croydon Local Plan Policy DM10.1. Some corner plots may be able to accommodate further height provided the massing is responsive to neighbouring properties.
- May extend beyond the neighbouring rear elevations to a greater amount than set out in guidance in Section 2.11 where it would enhance the definition of a suburban block and contribute positively to the townscape. This will be judged on a case by case basis and balanced against any unreasonable impact on neighbouring amenity.
- Should respond to the positioning of neighbouring front elevations, which may require stepping in footprint to maximise development potential of a corner plot.
- Should ensure that where driveways and vehicle access points join the public highway that they meet minimum distance thresholds from junctions and allow for safe sightlines.

2.14.3 Whilst this allows for larger development, such proposals would still need to conform with relevant policy and guidance with regards to the amenity of neighbours and future residents, such as overlooking and provision of outdoor amenity spaces.

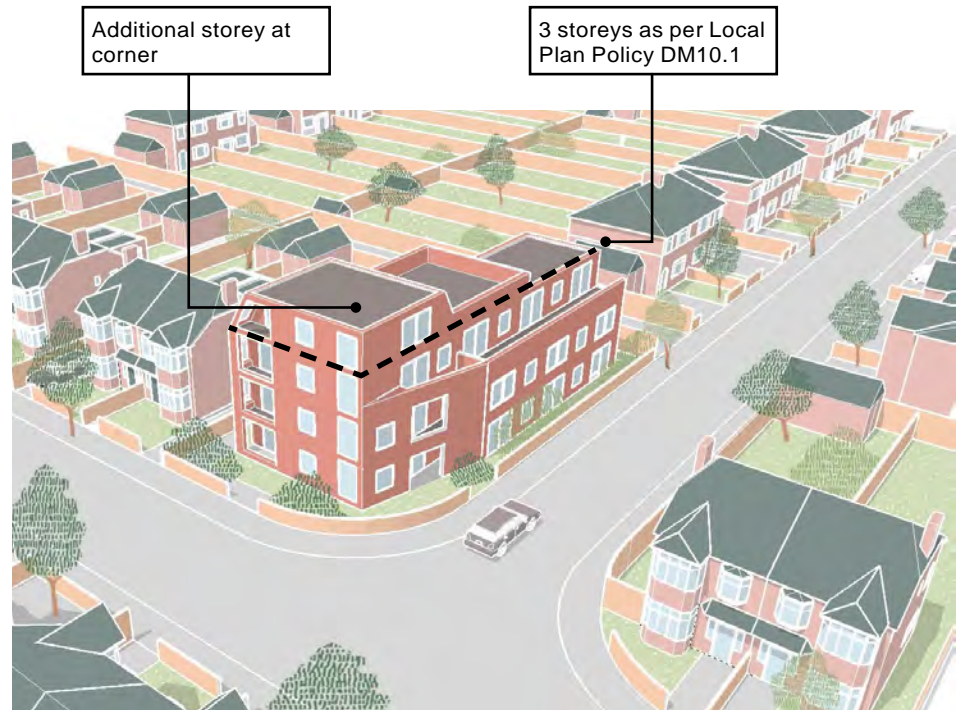


Figure 2.14a: Additional height on corner plot.

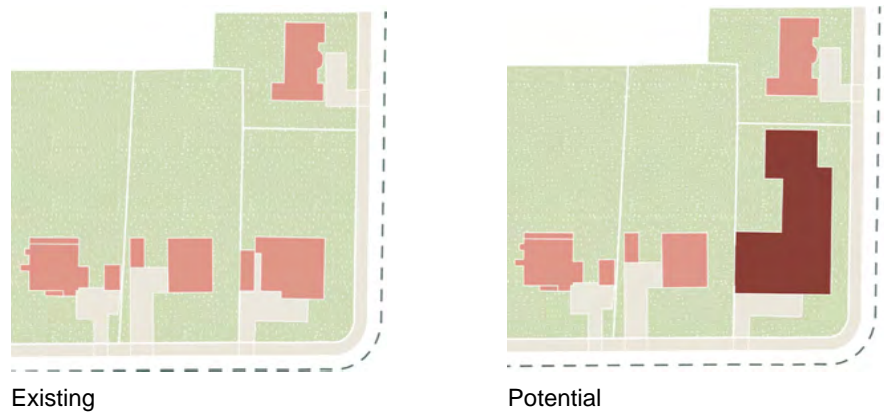


Figure 2.14b: Additional depth on corner plot with stepping of building footprint on a corner plot, responding to the position of neighbouring front elevations.

## 2.15 BUILDING ACROSS BOUNDARIES

2.15.1 Where neighbouring plots are redeveloped in conjunction, the form of the building may span the side boundary providing that the design responds to the gap in built form that historically existed across the boundary as drawn in Figure 2.15a. This is particularly important in areas where there is a consistent rhythm to the existing plot widths that contributes to the character of the area.

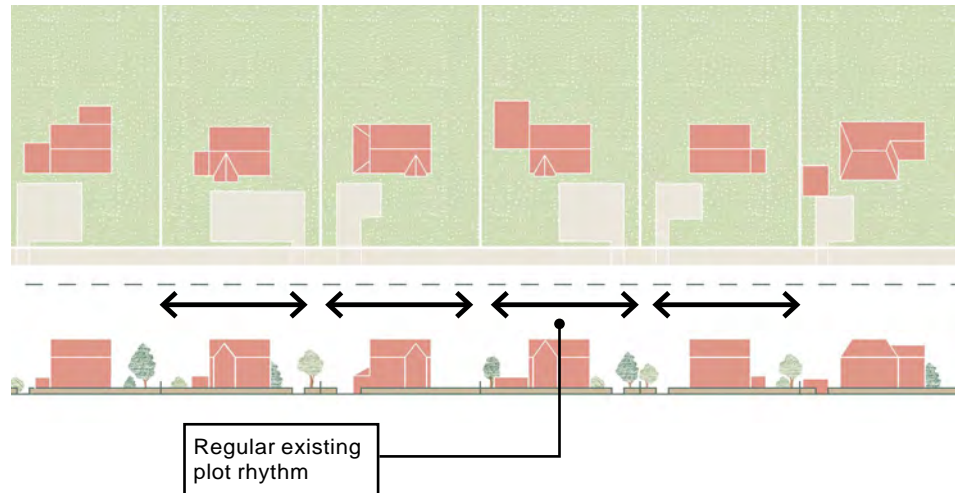
2.15.2 Proposals which span plot boundaries may seek to achieve this through:

- a. Stepping form to create a link element between two main building forms located on each of the original plots. (Care should be taken with the height of the roof form so that it does not appear awkward in the streetscene); and/or
- b. Use of fenestration and material treatment to differentiate the mass that spans the boundary from the mass either side.

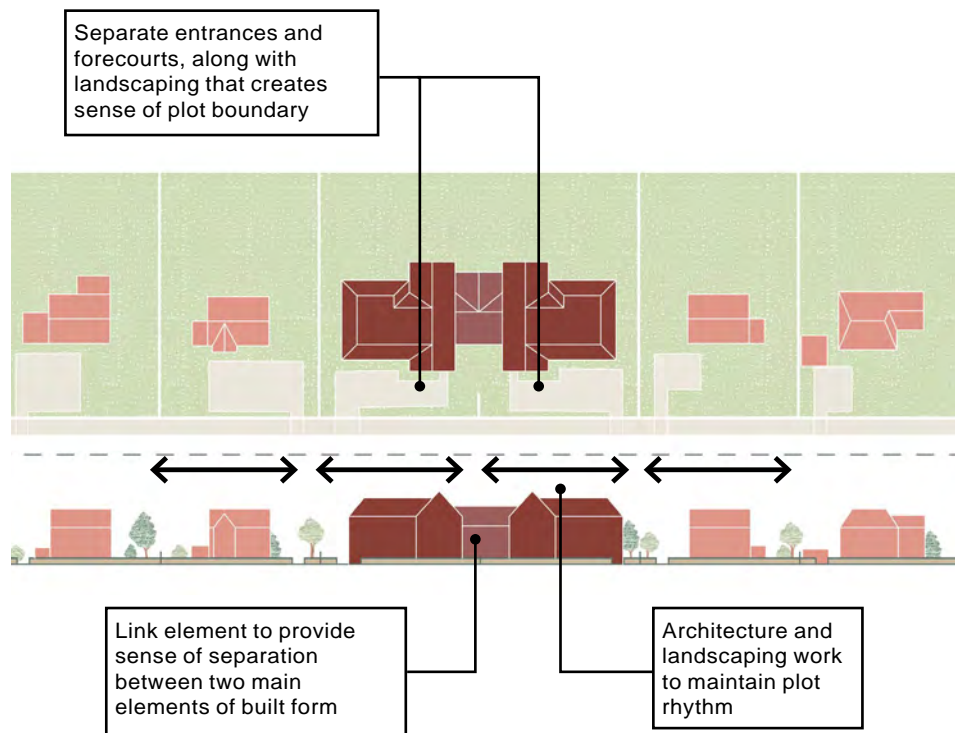
A built example of the above is provided in Figure 2.13d.

2.15.3 Consideration should also be given to the landscape design of the forecourt as this can also impact how the relationship between built form and boundaries is read. Proposals which span plot boundaries should:

- a. Use landscaping to reference the former boundaries between plots, creating semi-separated areas of gardens and parking; and
- b. Ensure the design of the front boundary respects the original access points and rhythm of divisions along the street, wherever possible.



### EXISTING



### POTENTIAL

Figure 2.15a: Maintaining sense of original development pattern through massing and site layout.

## 2.16 RELATIONSHIP TO BOUNDARIES IN EXISTING STREETS

2.16.1 Where development faces onto an *existing* street, the position of buildings and the space between houses creates part of the suburban feel. This can include:

- The width of the plot perceived from the street;
- The frequency of driveways that access onto the street;
- The views afforded by gaps between properties; and
- How far properties are set back from the pavement.

2.16.2 Developments that face onto an existing street that seek to build closer to the boundary with neighbouring plots must demonstrate consideration to the impact on neighbouring amenity as well as the rhythm of development along the street.

2.16.3 Separation distances, where there are no habitable room windows on the side elevations of the neighbouring or proposed development, should be no smaller than 1m, to allow for access to the rear of a property. Where existing development is built closer to the boundary, a proposal may seek to build to the same line as the existing.

2.16.4 Where a street is characterised by greater separation distances and

development up to 1m of the boundary would impact the streetscene, a greater separation will be required. This should generally be landscaped. Similarly where a street is characterised by smaller separation distances to boundaries, a smaller gap may be provided.

2.16.5 When considering internal layouts, outlook and issues of overlooking, with regards to proximity to a boundary, it is important to consider how neighbouring buildings may be developed in a similar manner in the future. Where there are habitable rooms facing to the side boundary, walls should be offset from the boundary to a distance that ensures sufficient access to daylight & sunlight (Refer to Section 2.9 for guidance).

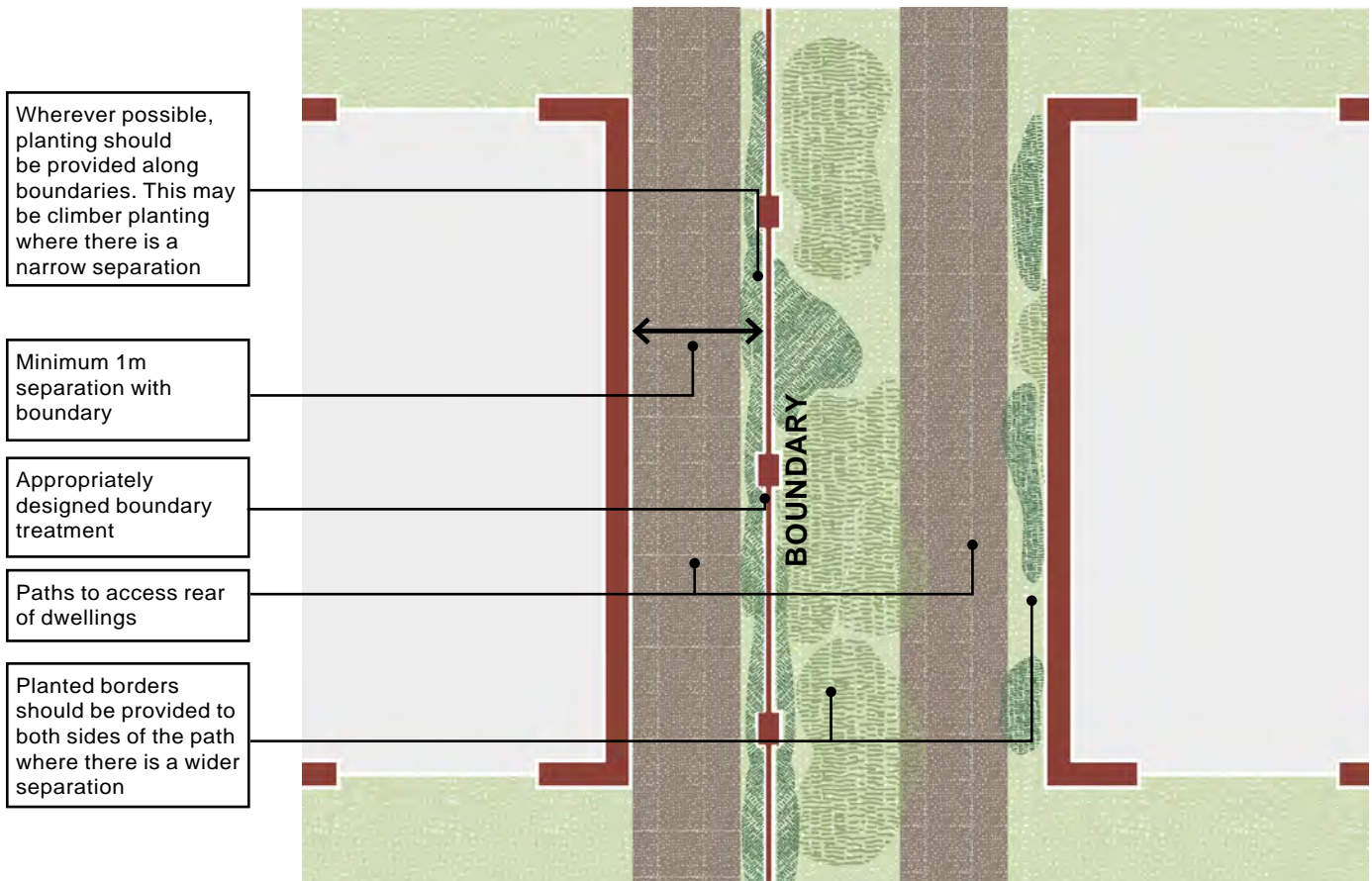


Figure 2.16a: Relationship with boundary.

## 2.17 FRONT ELEVATIONS – POSITIONING & WIDTHS

2.17.1 Proposals should consider the position of the front elevation of the proposal in relation to neighbouring properties and the streetscene to ensure that:

- Where there is a consistent front building line, any development should align with this unless it can be demonstrated it would positively enhance the character of the street; or
- Where there is an inconsistent front building line, the front elevation of a development may step forward or back provided it does not negatively impact the street scene. This may be needed to accommodate larger amenity spaces to the rear or increased parking provision to the front of a property.

2.17.2 The width of a proposal should be determined by the appearance within the streetscene and proposed proportions and fenestration of the front elevation. The maximum width of a development should also be guided by the proposal's relationship to the plot boundary (Refer to Section 2.16 for guidance) and impacts on daylight & sunlight (Refer to Section 2.9 for guidance).

2.17.3 Fenestration and material treatment can be used to add interest to elevations and resolve proposals that would otherwise appear overly wide or narrow in the streetscene.

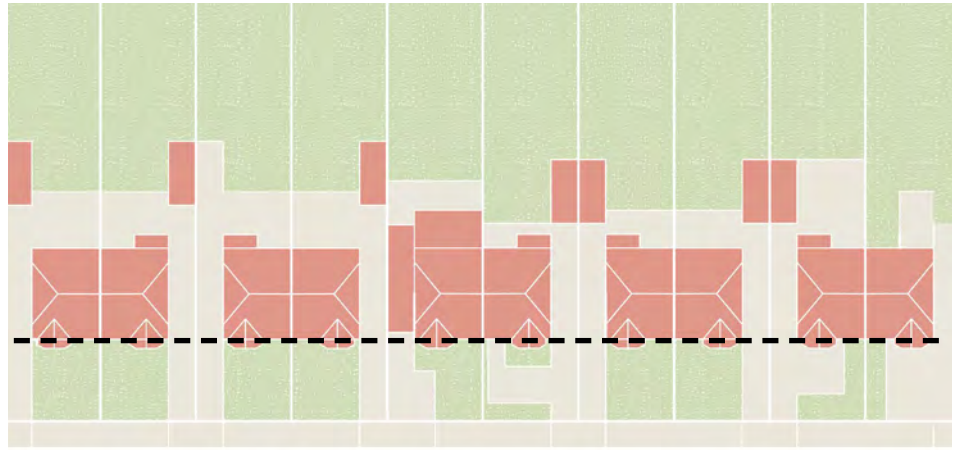


Figure 2.17a: A consistent building line facing the street.

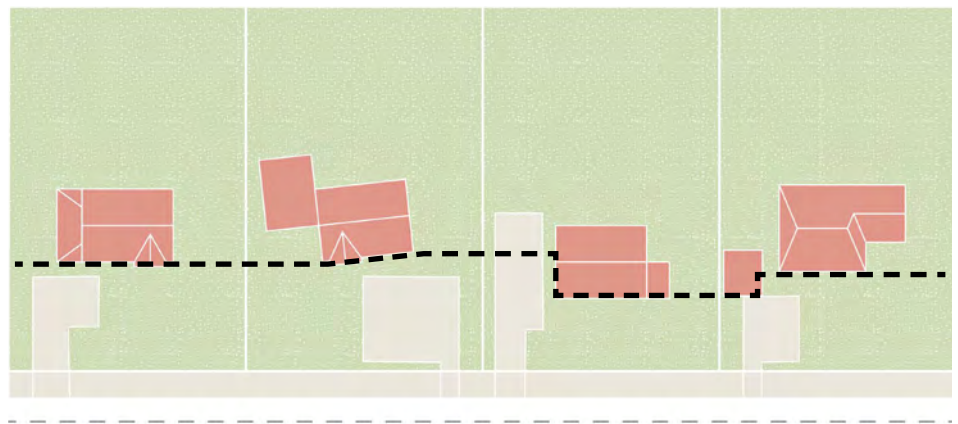


Figure 2.17b: An inconsistent building line facing the street.



Figure 2.17c: A wide development which has successfully dealt with its width through proportions and fenestration.



Figure 2.17d: A development which appears wide and squat as a result of poorly considered proportions and fenestration.

## 2.18 POSITIONING OF DEVELOPMENT IN REAR GARDEN AND BACK LAND SITES

2.18.1 Due to varying plot sizes across the borough, it will often be desirable for developments in rear gardens and back land sites to build along or in close proximity to boundaries and existing buildings to maximise development opportunity. However, it is important that new developments are sited so as to minimise their impacts on the residential amenities of neighbouring properties.

2.18.2 Development in rear gardens, garage and back land sites should be positioned so that:

- If within a rear garden, the footprint of the proposal conforms with Policy DM10.4(e) of the Croydon Local Plan. The policy seeks a minimum retention of 10m length and no less than half or 200m<sup>2</sup> (whichever is the smaller) of the existing garden area to be retained for the host property. This is primarily to provide sufficient outlook and amenity to existing dwellings, but also provides additional benefits of maintaining a sense of openness within gardens.
- Proposed buildings along boundaries may be thoughtfully designed to ensure there is no unreasonable loss of sense of openness or overbearing to neighbouring properties. Developments that propose to build along boundaries must demonstrate:

1. That the appearance of the wall, as viewed from neighbouring properties,

2. How rainwater goods will be contained within the curtilage of their plot.
- All guidance on overlooking (Refer to Section 2.9) and form (Refer to Sections 2.12 or 2.13) have been adhered to.

2.18.3 All developments on rear garden, garage and back land sites should demonstrate how the proposal would not prejudice similar development on neighbouring sites in the future.



Figure 2.18a: A rear-garden house designed by Dallas–Pierce–Quintero that builds along the boundary wall. (Photo: David Butler)



Figure 2.18b: Existing - view from neighbour's kitchen window without rear garden development.



Figure 2.18c: Existing - aerial view of plots without rear garden development.



Figure 2.18d: Potential - aerial view with rear garden development in one of the plots.



Figure 2.18e: Potential - view from neighbour's kitchen window with a rear garden development built along the boundary. No windows face onto neighbouring garden and proposal drops down towards boundary, to minimise loss of amenity and ensure development potential of neighbouring garden.



Figure 2.19a: A street facing development of family homes on Purley Downs Road. The development provides accommodation within a mansard roof.



## 2.19 ROOF FORMS

2.19.1 Roof forms should be proportionate to the mass of the associated building and should respond to the design of the proposal. Whilst pitched roofs are commonly associated with suburbia, flat roofs are also acceptable. Proposals should ensure that:

- The proportions of the roof to the rest of the proposal are well considered. Where a pitched roof is proposed, deep plans can lead to shallower pitches which read poorly in the streetscene and will generally not be acceptable.
- Where a stepping roof form is used, it is done in a manner that adds interest to a proposal and helps reduce the appearance of mass, rather than overcomplicating the external appearance.
- Any projecting flat roofs associated with a development predominantly covered with a pitched roof are sensitively integrated into the design and do not confuse or detract from the external appearance. Where appropriate, projecting flat roofs can provide a functional use, such as a balcony.
- Where dormers are proposed that cut through the eaves line, the scale and positioning of the dormer in relation to the eaves is well considered (Refer to Figures 2.19g and 2.19h for good and bad examples).

2.19.2 It should be noted that pitched roof forms can read as overbearing in elevation drawings. Due to their pitch, the mass of such a roof is usually less when read in the streetscene. As such, it can be beneficial to provide a street level visual of the proposal to help describe the overall appearance of the proposal.



Figure 2.19b: Flat roof forms are acceptable. Set-back top floors with a change in material can be used to add interest and break down the mass.



Figure 2.19c: Unconventional roof forms are part of a compelling design by Alison Brooks Architects to break down the mass of a proposal. (Photo: Paul Riddle)



Figure 2.19d: Projecting flat roofs successfully designed by MATA Architects to be used as balconies.



Figure 2.19e: Pitch of roof is steep enough to read positively in the streetscene.



Figure 2.19f: Pitch of roof appears too shallow in relation to mass of building.



Figure 2.19g: Well proportioned and positioned dormers contribute to design of roof.



Figure 2.19h: Poorly proportioned and positioned dormers and eaves results in a poorly resolved roof.

## 2.20 BASEMENTS & WORKING WITH TOPOGRAPHY

2.20.1 Croydon's topography presents many opportunities for new development in semi-submerged lower floors with level access on one side of a property. In other settings, it may be possible to provide fully submerged basements or lower-ground floor development, however these are often considered to be uncharacteristic of suburban settings and need to be carefully designed to minimise any negative impacts on the streetscene.

2.20.2 A sloping topography can provide opportunities to work with the landscape to achieve greater footprints which extend beyond neighbouring elevations by stepping the building mass. By stepping built form down a slope, impacts on neighbours can be avoided. It is important that the rhythm of stepping follows the gradient of the slope to avoid large built form protruding from the hillside.

2.20.3 Basements, lower-ground floor development and massing that steps down a slope that do not require the introduction of light wells will generally be acceptable provided that any habitable rooms have sufficient access to natural light (Refer to Section 2.9 for guidance). Proposals will be judged on a case-by-case basis, based on the impact to the street scene, neighbouring development potential and amenity.

2.20.4 Basements, lower-ground floor development or massing that steps down a slope that requires the introduction of lightwells will only be acceptable where:

- Located to the rear of a property, or if located to



Figure 2.20a: Stepping massing down a hill to gain additional accommodation.

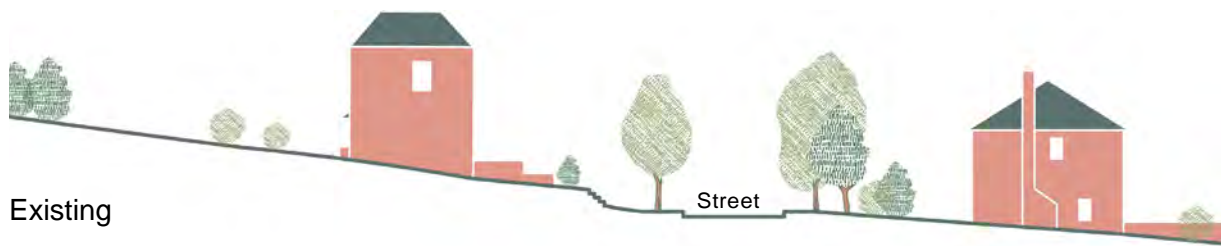
the front of a development, would not be intrusive on the streetscene. Where necessary, this may require railings to be screened with planting;

- Any retaining walls are integrated into the design of the proposal and wherever possible should be landscaped (Refer to Section 2.35 for guidance);
- Lightwells have a depth that is greater than 25 degrees as measured from 2m high on windows into habitable rooms and they meet BRE guidance (unless this would render development unviable on back land and rear garden sites, in such circumstances a compelling design would need to mitigate failure to meet this guidance);
- All flats within are dual aspect, and have well-considered internal layouts to ensure the accommodation is functional and liveable; and
- Not located in an area of groundwater flooding.

2.20.5 Basements or lower-ground floor development in areas where there is a historic pattern of such

development will generally be acceptable where they are well laid out and have sufficient access to natural light and are designed to respond to the existing character of basement or lower-ground floor development in the area.

2.20.6 Where any proposal for basements, lower-ground floors or massing that steps down a slope would result in large retaining walls, they must be designed in line with landscaping guidance (Refer to Section 2.35 for guidance) and accompanied by landscaping plans detailing the integration and resolution of impacts on the street scene and neighbouring amenity.



Existing

Street

Area excavated to create lightwell to the rear of the property



Proposed

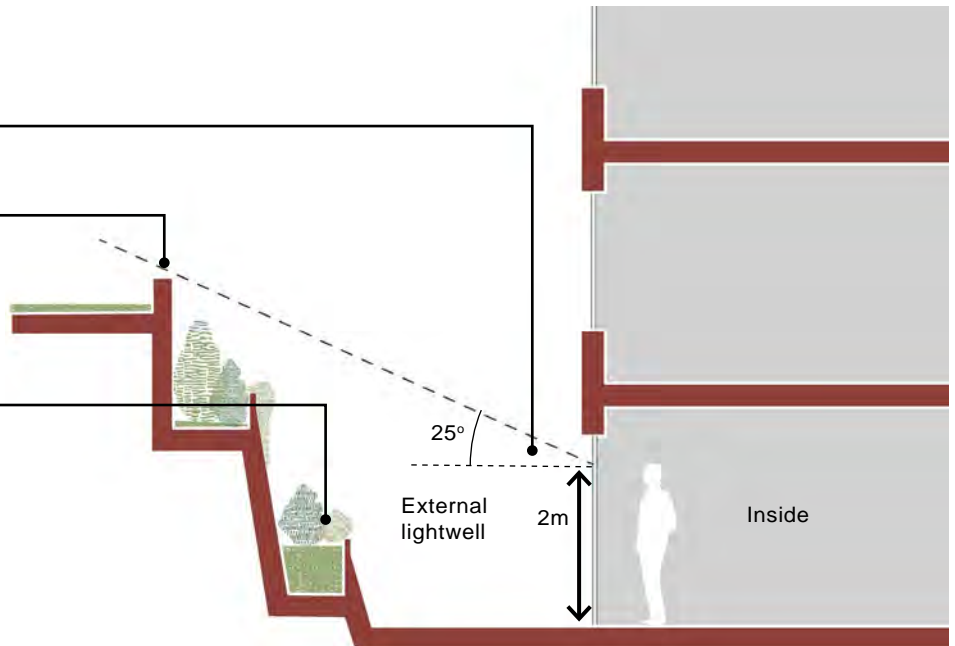
Street

Figure 2.20b: A proposal for redevelopment with semi-submerged ground floor, including lightwell to rear, making use of the topography to provide additional accommodation.

Depth / width of lightwell determined by a 25° line measured from 2m high on the window of habitable room

Retaining wall does not break 25° line

Retaining walls should generally be landscaped to increase biodiversity and enhance appearance



25°

External lightwell

2m

Inside

Figure 2.20c: Section showing the design guidance for creating a light well for a basement or lower-ground floor.



Figure 2.20d: Poorly designed and small lightwell that is not integrated into the design of the wider proposal.



Figure 2.20e: Successful use of topography to integrate parking into a basement. Once matured, planting will reduce appearance of retaining wall.

# MATERIALS AND EXTERNAL APPEARANCE

## 2.21 MATERIALS

2.21.1 Materials should be of high quality and chosen as an integral part of the design.

2.21.2 The existing material palette in Croydon varies greatly depending on the age of development in the area. Detail on materials associated with specific housing typologies present in Croydon can be found in the Croydon Typology Appraisal<sup>26</sup>.

2.21.3 Choice of primary facing materials should be informed by the specifics of the development and the specific nature of the context surrounding a development site, however in general, robust, natural materials with natural variation are characteristic of suburban locations. For example, this may include:

- Brick (including high quality red, multi-stock, London stock)
- High quality clay hung tiles
- High quality clay roof tiles
- High quality natural slate tiles.

2.21.4 Applicants should assess the surrounding area as this may inform their choice of materials. Materials which are innovative or different from their context may be acceptable where they are part of a compelling design, and where relevant give careful consideration to heritage assets (Refer to Section 1.4 Heritage for guidance).

<sup>26</sup> Available in the Urban Design, Local Character and Heritage section of the local plan evidence at: <https://www.croydon.gov.uk/planningandregeneration/framework>.

## 2.22 CHOICE OF MATERIALS & APPROACH TO CHARACTER

2.22.1 Choice of materials should form part of the approach to character as set out in guidance 2.8.

2.22.2 In an Innovative and Original approach, there is likely to be good scope for the use of contemporary materials, as well as more traditional materials. The choice of material should contribute to the Innovative and Original approach.

2.22.3 In a Contemporary Reinterpretation approach, contemporary materials could be used successfully in conjunction with more traditional building forms, provided they form a consistent and considered part of the overall design and are well detailed. It may also be appropriate to use traditional materials with contemporary detailing. The choice of materials in such an approach is likely to be informed by the local context.

2.22.4 In a Sympathetic and Faithful approach, applicants should, wherever possible, seek to use the same materials and detailing as the surrounding housing typologies. For this to be successful, applicants may wish to use reclaimed materials. Poor quality modern reproductions of traditional materials and their detailing will not be acceptable.



Figure 2.22a: An innovate material approach to an infill development by Carl Turner Architects. (Photo: Tim Crocker)



Figure 2.22b: The use of a mixture of contemporary and traditional materials contribute to a contemporary reinterpretation approach by Henley Halebrown Architects. (Photo: Andy Stagg)



Figure 2.22c: Faithful replication of material and detailing in a street facing development. (Photo: Chartwell Land & New Homes)

## 2.23 MATERIAL APPLICATION & DETAILING

2.23.1 The extent of application of different materials within a proposal (i.e. the amount of area covered), along with the material joints between different elements, has significant impacts on the built quality of a building, how it weathers over time and its appearance in the short and long term. Development proposals should also consider how the choice of materials will be viewed at the scale of a door opening, window reveal, eaves overhang, material join and corner.

2.23.2 Changes in material can be useful to increase or reduce the emphasis of different parts of a building, as well as adding interest. For example a projecting bay may have a different material to draw attention to it as an architectural feature, whereas a mansard roof or top floor which is set-back may choose a lighter-appearing material to reduce emphasis. However, where they are not properly integrated into a design and lack depth (for example by being applied to one façade that meets a corner where you read the material junction, as in Figure 2.23j), they will not be acceptable.

2.23.3 Patterns of materials such as change in brick or metal perforation, or a combination of materials, can be used to add interest to large blank façades where such blank façades are considered unacceptable. Use of patterns must read as part of the overall architectural expression of the building, rather than as an alien element applied to the envelope of a building.



Figure 2.23a

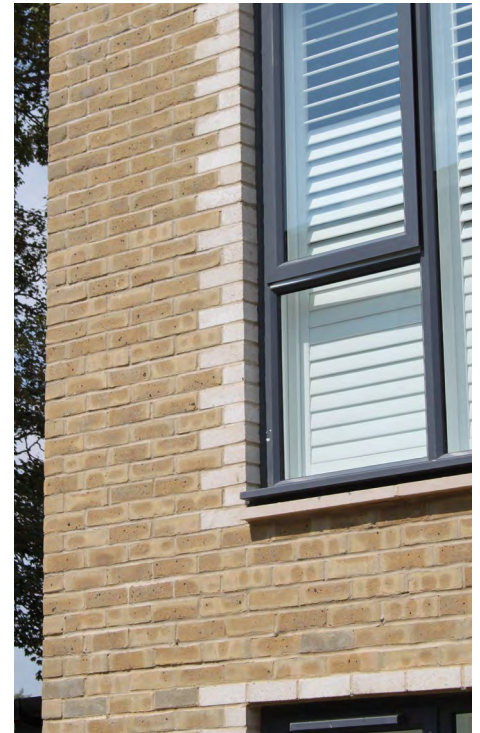


Figure 2.23b



Figure 2.23c

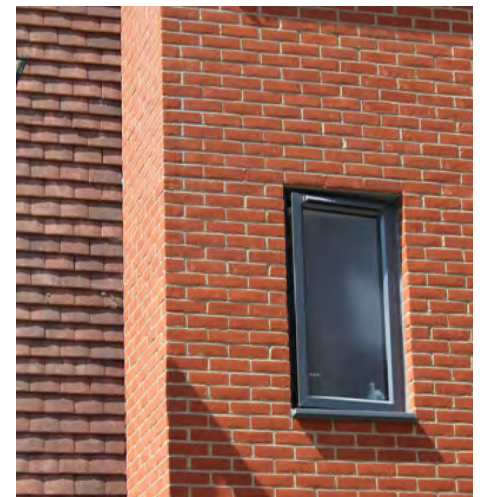


Figure 2.23d

Figure 2.23a - 2.23d: Effective use of high-quality materials in well considered details that express elements of the facade and add interest.



Figure 2.23e

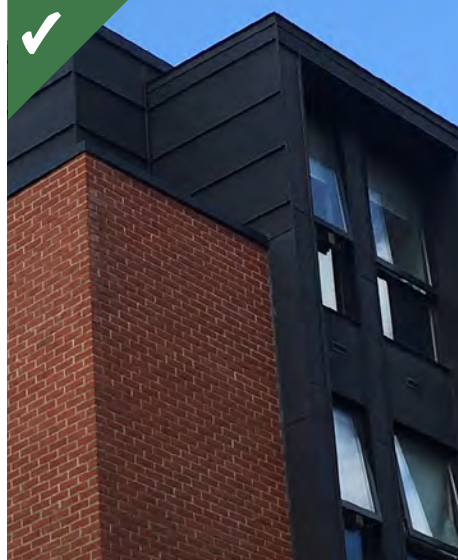


Figure 2.23f



Figure 2.23g

Figure 2.23e - 2.23g: Effective use of high-quality materials in well considered arrangements and patterns that express elements of the facade and add interest.



Figure 2.23h: Use of render that weathers poorly and not be maintained.



Figure 2.23i: Use of wood that weathers unevenly near material joins and has not been properly maintained.



Figure 2.23j: The change in render colour at the corner contributes to a flimsy appearance, highlighting that it is surface applied and lacks depth.



Figure 2.23k: Half-timbering has been wrapped around the side of the building but stops at the first window, highlighting that it is non-structural and is an applied detail. It should have either been continued along the length of the building or kept within the gable so it did not break the eaves line.

2.23.4 The use of timber and render for cladding can weather poorly, particularly where parts of a façade are exposed to the elements, creating visually unappealing, uneven discolouration or deterioration. This can be prevented through careful consideration of how a building's envelope may be unevenly exposed to weathering. For example, water run-off from roofs or windows can cause severe deterioration. Development proposals that seek to use timber or render cladding will only be acceptable where the detailing between elements of the building is carefully considered and demonstrated in sufficiently detailed drawings submitted as part of the application. Applicants should also consider the on-going maintenance of these materials, such as the need to re-paint or stain every few years.

2.23.5 Where a development is located in a street characterised by half-timbering and an applicant seeks to replicate this cladding, real timber pieces appropriately treated for weather protection and with detailing that is informed by traditional timber detailing should be used.

## 2.24 FENESTRATION / PLACEMENT OF OPENINGS

2.24.1 The placement of windows and doors within a façade should be carefully considered to provide relief from the materials covering the bulk of the building envelope. The regular pattern and proportions of windows and doors can also be a key characteristic of an area.

2.24.2 The regular or irregular sizing and placement of windows and doors in a local area should be identified through photographic and drawn contextual analysis, typically by line drawings of the street elevations. Development proposals may use this as a starting point for window and door proportions and positioning. Positioning may occur by replicating or departing from the pattern, provided it is part of a well-considered and compelling architectural expression. Where symmetrical elevations or a consistent pattern of openings are characteristics of an area and the proposal seeks to replicate this, the scale and proportions of the elevation should not be altered as this can create a weak pastiche.

2.24.3 The proportion and position of windows can be used to adjust the way the proportions, scale, mass and height of a building are perceived; this may include helping to emphasise verticality, horizontality or even reduce the apparent scale of a building that appears too wide or tall. For example, vertically proportioned openings on a wide façade can help to reduce the appearance of width by adding verticality to the expression of the façade. Arrangements of windows that create an in-balance across a

façade or appear poorly positioned or proportioned, and do not appear to form part of a compelling architectural approach, will be unacceptable. Large elevations with small openings can be overbearing and will generally not be acceptable. New developments of a scale larger than the existing predominant scale may struggle to replicate fenestrations of neighbouring properties successfully and as such may require larger opening sizes.

2.24.4 Front entrances to a property should be clearly identifiable and of a scale that responds to the scale of the development; standard domestic doors and surrounds usually appear small on larger developments containing flats. Applicants may consider the use of framing devices, such as porches, to add emphasis to a front entrance.



Figure 2.24a: Proportions and positioning of windows add to horizontal emphasis of the façade and contribute to a weak pastiche.



Figure 2.24b: Windows are too small and their positioning fails to break up mass of façade.



Figure 2.24c: Generously sized openings help to break up the mass of new terraced homes designed by Haworth Tompkins. Their position adds rhythm to the elevation. (Photo: Jack Hobhouse)



Figure 2.24d: Simple but robust material choices are given interest through the placement and detailing to windows and doors in a row of mews houses designed by Peter Barber Architects. (Photo: Morley von Sternberg)





Figure 2.24e: A development of homes in a backland uses a contemporary palette of brick, metal and timber. The most exposed surfaces are made of hardwearing brick, whilst protected features such as doors are made of timber. Refer to guidance 2.21 - 2.23.

## 2.25 REVEALS & OVERHANGS

2.25.1 Interest can be added through detailing of eaves, window and door openings, lintels and plinths. The depth of window and door reveals should generally be at least 100mm deep so as to provide a provide substance, texture and character to elevations.

2.25.2 Varying the depth of a window reveal, from a recess to a bay, can be used to add interest to a façade, but should be done with care to avoid overly complicated façades.

2.25.3 Fully flush façades with windows and doors aligned to the external envelope, are only acceptable on contemporary proposals where it is justified as part of a well-considered and compelling overall architectural approach. Where applicable, development proposals will need to demonstrate that there is sufficient expression in façades through massing and material treatment to ensure that façades do not appear overly flat and/or overbearing.

2.25.4 Deep eaves or large overhanging roofs will only be acceptable where they are integrated into the design and would not result in unpleasant and shady spaces.

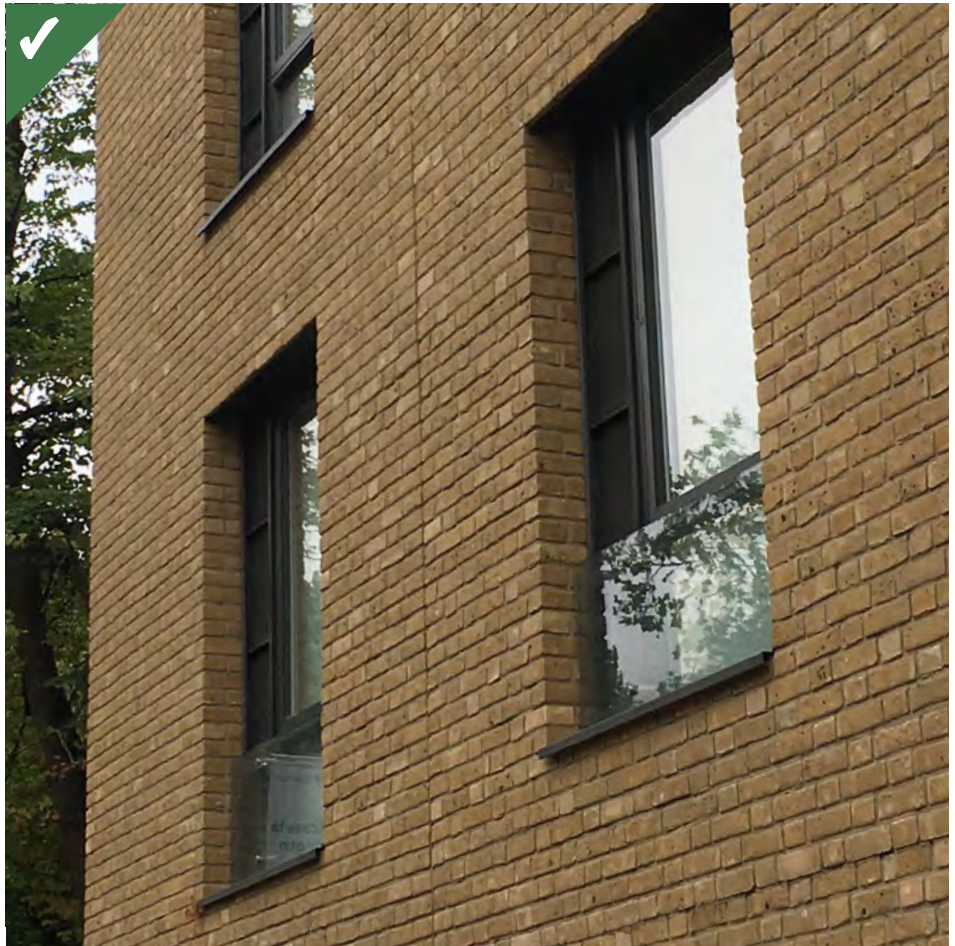


Figure 2.25a: Deep reveals provide a sense of solidness that can add appeal to façades.



Figure 2.25b: Shallow reveals can result in a poor appearance that lacks depth and windows appear as if they are stuck on. Shallow reveals should generally only be used where they are part of a compelling design.

## 2.26 BALCONIES

2.26.1 Balcony design is an integral part of a proposal and must be part of the initial design phase.

2.26.2 Balconies supported by columns will generally not be acceptable to the front of a property, but may be acceptable to the rear of a property where they are integrated into the design. Recessed and cantilevered balconies add less clutter to the external appearance of a development and may be acceptable to the front, as well as the rear of a property, where they are successfully integrated into the design of the proposal.

2.26.3 Balustrades may adopt the same material as the building envelope, minimising the impact on the external appearance. However, this may limit the amount of light to windows and doors set within the balcony, in which case, a metal or wooden balustrade

may be used as these can be appropriate in a suburban setting.

2.26.4 Metal and wooden balustrades should be finely detailed and of a colour that responds to the window frames and materials of the external envelope of the building.

2.26.5 Glass balustrades can dominate the appearance of a development as their reflectivity can cause them to stand out and they can often present an overly commercial character, therefore their use will generally be unacceptable. Where glass balustrades are proposed, it must be part of a compelling design and should avoid using tinted glass. Such glass balustrades will only be acceptable where they are designed with minimal framing. Glass balustrades with heavy metal framings and fixings will not be acceptable.

2.26.6 Wherever possible, the sides of balconies should be open

to maximise amenity for future residents, however in some cases screening may be required for overlooking purposes. Balconies that require screening to prevent sideways overlooking should be avoided as add-on screening devices often appear incongruous in a suburban residential setting. Where necessary, screening material that is climb-proof and responds to the materials and design of the building envelope should be used. For example, 'hit and miss' brickwork are acceptable means to resolve issues of sideways overlooking and appropriate response to a brick building. Similarly, perforated metal may be used to create a screen while drawing upon the material of the window frames (if relevant). Frosted glass screens are generally unacceptable as the material appearance often contrasts with the material of the building envelope, making a feature that is not traditionally characteristic of suburban settings unduly prominent.



Figure 2.26a: External balconies with supports that are not integrated into design of the proposal. The use of glass balustrades have resulted in occupiers retrofitting screening devices to provide privacy that exacerbates the poor appearance.



Figure 2.26b: Balconies facing the street that are successfully integrated into the design of the proposal.

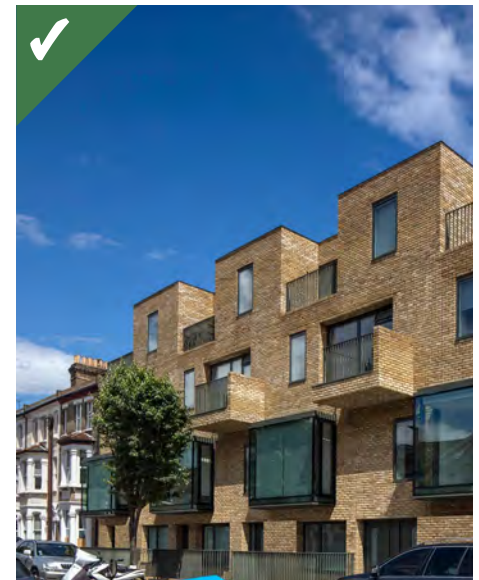


Figure 2.26c: A combination of recessed and cantilevered balconies are provided in this development designed by Peter Barber Architects that provide rhythm to the scheme and allow it to successfully sit alongside a traditional terrace. (Photo: Morley von Sternberg)

## 2.27 VISIBLE ANCILLARY ITEMS

2.27.1 With the exception of rainwater goods, no servicing items, such as vents, flues, pipes, wiring, telecommunication boxes or satellite dishes, should be located on the front elevation or prominent side elevation of a development. Such items add clutter and diminish the appearance of a building. All pipes should be grouped and, where technically possible, combined into a single pipe. Servicing items should be located to be as discreet as possible, at the end of an elevation or at the corner of a recess or, where possible, within the building envelope. Shadow gaps incorporating drainage could be incorporated within the design of the building, breaking up the built mass while reducing the visual impact of such ancillary items. Applicants should illustrate external servicing item locations on drawings submitted with planning applications.

2.27.2 Soil and waste pipes should be incorporated into the envelope of the building. Applicants will be expected to demonstrate there is appropriate space for servicing pipes to be accommodated within the envelope of a building.

2.27.3 Eaves and/or gutters which overhang a sites boundary are generally not acceptable as this could prejudice the development potential of adjoining sites.

2.27.4 Meter cupboards and service intakes should be located out of sight from the street or in subterranean meter cupboards where possible.

2.27.5 Solar panels should be integrated into the design from an early stage with a regular layout and a discreet appearance. If located on a flat roof, they should

not be visible from street level. Where located on a pitched roof, they should be integrated into the design of the roof so as to minimise impact on the appearance of the development.

2.27.6 Other items such as alarm systems and signage should be considered early in the design stage. The quantity should be limited and positioned to avoid the appearance of applied clutter on the external envelope.

2.27.7 If colours other than white are used in window and door surrounds, (i.e. grey aluminium), all externally applied items, such as pipes and meter cupboards, should generally be finished in the same colour. Applicants should indicate the colour and finish of ancillary items on drawings submitted with planning applications.



Figure 2.27a: Poorly coordinated placement of visible ancillary items on elevation visible from the street has a negative impact on the building's appearance.



Figure 2.27b: Example of where placement of servicing items has been considered early in the design development, ensuring elevations are free of clutter.



Figure 2.27c: Flues, vents and pipes add clutter to the façade.

# SITE LAYOUT & SERVICING

## 2.28 SUBDIVISION OF PLOTS AND INFILLING

2.28.1 Proposals that seek to subdivide and/or infill must conform to Policy DM10.4(e) of the Croydon Local Plan and should refer to Section 2.16 or 2.18 of this guide (as relevant) in relation to building positioning. They should also consider the existing pattern of development along the street, and the associated visual amenity that breaks in built form provide.

2.28.2 Whilst spaces between sets of terraced homes and pairs of semi-detached homes are often characteristic of the original design and can provide visual amenity, in many streets this pattern of development has already been broken by side extensions and older infilling. In any street where it would not result in significant loss of visual amenity, infilling will be acceptable.

2.28.3 The pattern of front gardens, boundaries and driveways visible from the street can add rhythm to the street and contribute to the townscape. This can be negatively interrupted where a plot is subdivided.

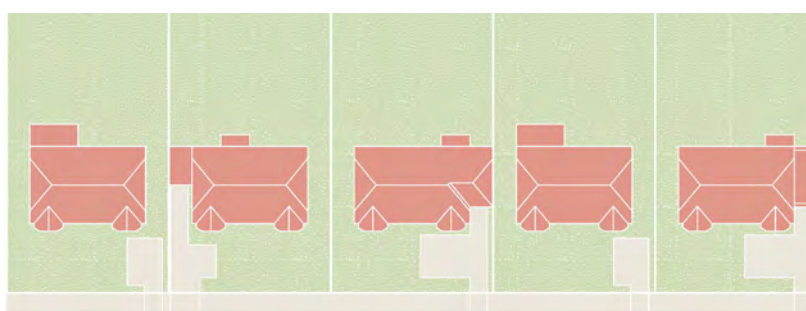
2.28.4 Where subdivision would be visible from the street, proposals should ensure that where there is a consistent pattern of forecourts, driveways and/or boundaries:

- They are retained or rebuilt to follow the existing pattern of the street. This should include minimising the number of new vehicular access points. Vehicular access points may be shared by several properties.
- The front garden is not subdivided with walls, fences or hedges. A larger front garden should be maintained with access to properties from one forecourt.

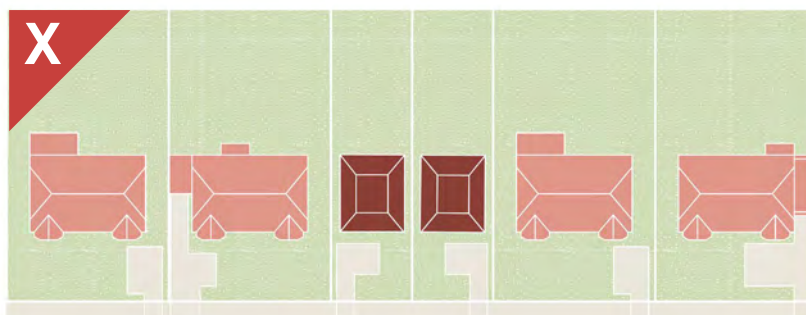
2.28.5 Subdivision will only be acceptable where it doesn't limit the provision of a larger development or the delivery of family homes.



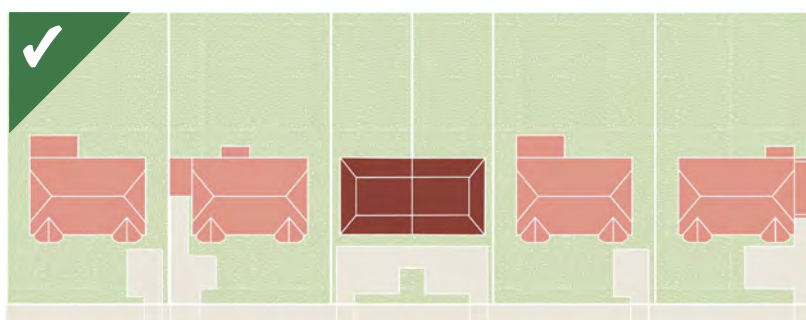
Figure 2.28a: Successful subdivision to provide two new homes, with one to the rear of the plot.



Existing: Even spacing of existing plots provides a consistent rhythm to the street



Unacceptable: Plot subdivision which divides the forecourt would interrupt consistent rhythm of the street



Acceptable: Plot subdivision with a shared forecourt that helps to maintain the consistent rhythm of the street

Figure 2.28b: Method for plot subdivision in a street with a consistent rhythm of plot sizes.

## 2.29 DRIVEWAYS, ENTRANCES AND NEW ROUTES

2.29.1 Driveways, entrances and new routes should be designed to prioritise pedestrian flow and safety. This will generally mean limiting the number of vehicular access points to control vehicle flow and prioritising pedestrian and cyclist focussed designs.

### ENTRANCES & BOUNDARY TREATMENTS

2.29.2 Entrances to new developments could be clearly marked with gate posts, planting or a built boundary treatment (such as a brick wall) that responds to the existing streetscene, the proposed dwelling and scale of the street.

2.29.3 Gated developments will not be acceptable.

2.29.4 Entrances should avoid tall walls or wooden fences either side of a new driveway that close off the development to the street.

2.29.5 Front boundaries should be designed to respond to any consistent boundary treatments along the street. Planting along the front boundary can help improve the streetscene and will generally be encouraged.

### NEW DRIVEWAYS AND HARDSTANDING

2.29.6 New driveways should be designed in accordance with Figure 2.29e and Figure 2.29f. New driveways and hardstanding should be designed to ensure no net loss of vegetation or areas of planting and landscaping.

2.29.7 Entrances should generally be of a width that meets the criteria set out in Figure 2.29e and where possible, replicate any

characteristic scale and pattern of entrances and easements witnessed along the road. Overly wide entrances and easements that would impact the streetscene or result in loss of landscaping will not be acceptable. Where an existing entrance is narrower, the acceptability of this will be judged on a case by case basis and, where necessary, development applications will need to demonstrate that a modern vehicle can safely and easily access and exit from the site.

2.29.8 Undercroft arrangements are only acceptable where they do not negatively impact the streetscene, can be concealed from the street with a garage door and meet relevant emergency

access and highways regulations. A garage door should be of a scale appropriate to the street and the proposal.

2.29.9 Where a new driveway accesses onto a road within the Transport for London Road Network, applicants should consult and come to an agreement with TfL. TfL should also be consulted where a development accesses onto or is in close proximity to a tram route.



Figure 2.29a: Streetscene dominated by high fences used as boundary treatments.



Figure 2.29b: Failure to screen hardstanding and bin stores with a landscaped boundary treatment.



Figure 2.29c: A low-level boundary treatment which integrates planting.



Figure 2.29d: The impact of a retaining wall is minimised through the use of planting.

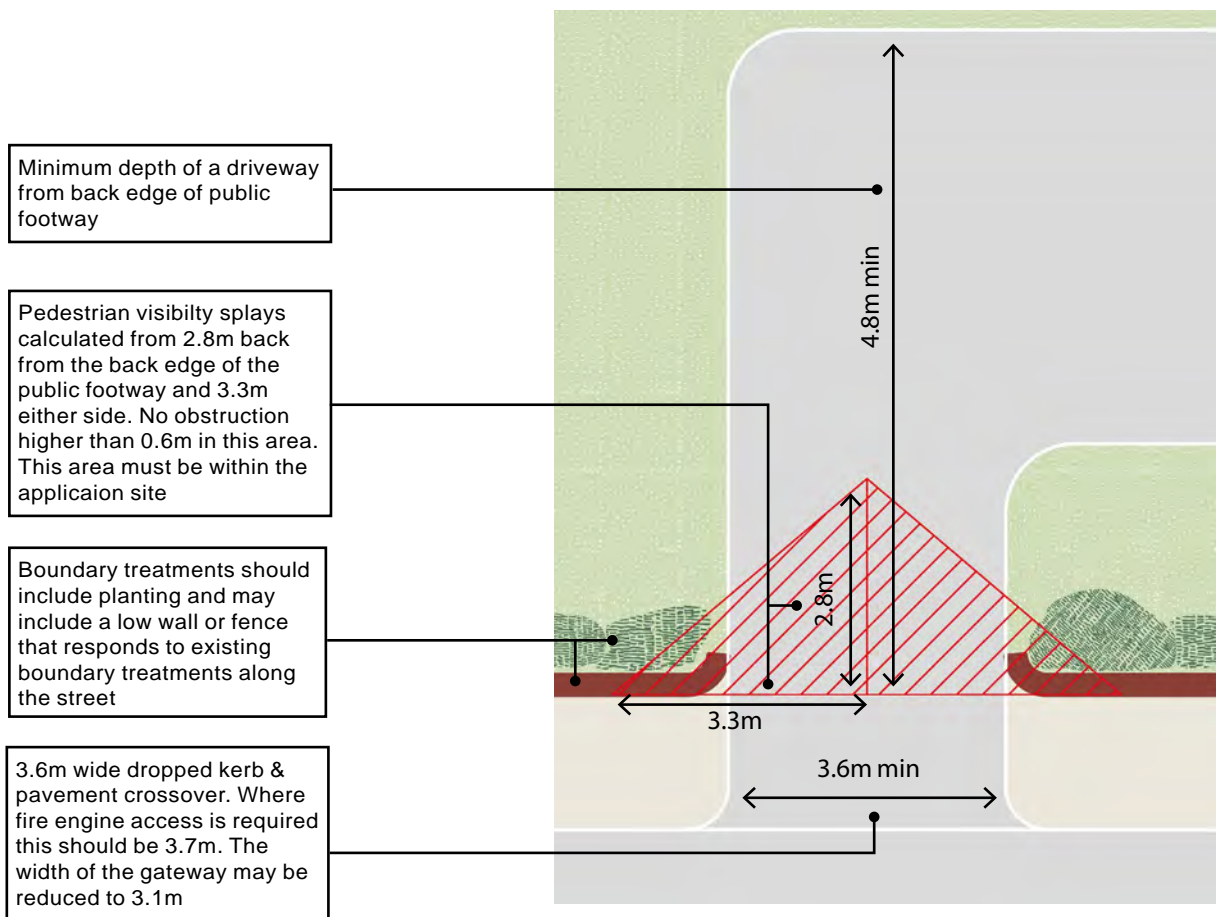


Figure 2.29e: Requirements for entrances and boundary treatments.

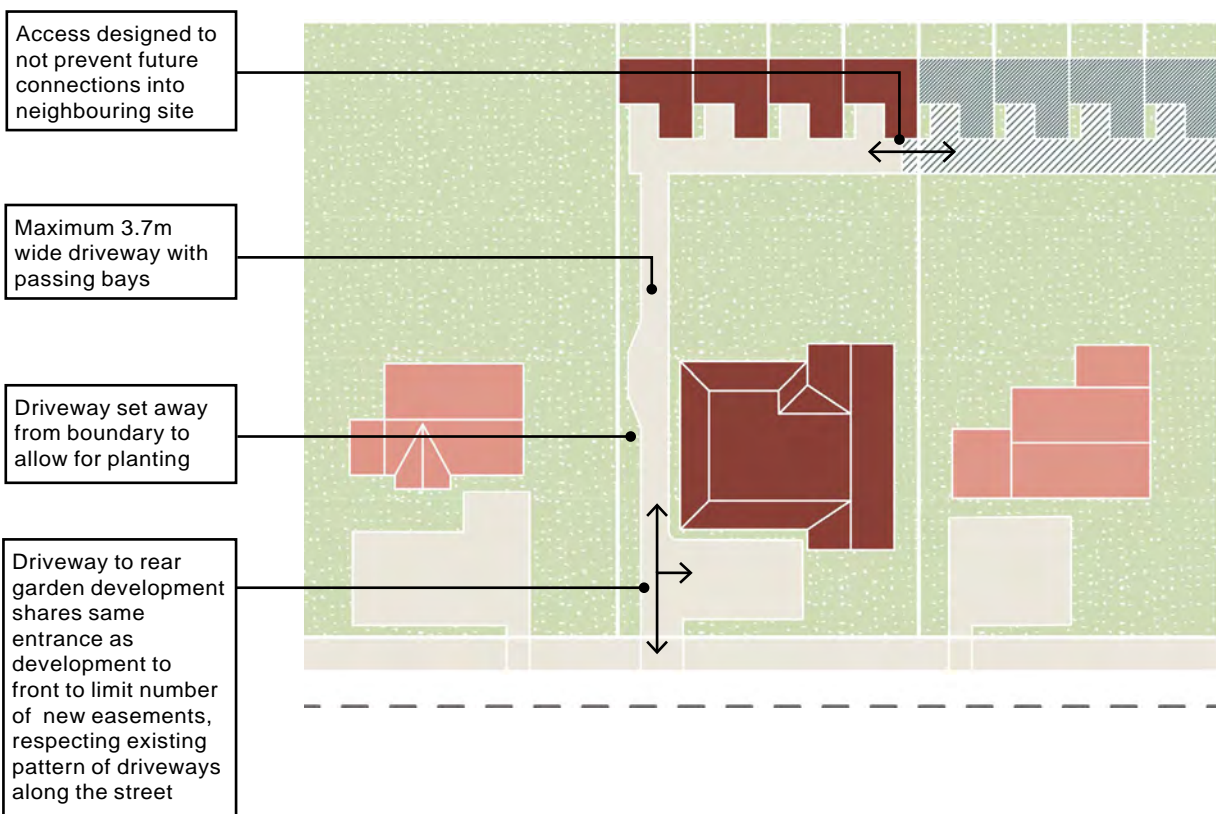


Figure 2.29f: Optimal layout of driveway for redevelopment of a detached home and for access to rear garden development.

## ACCESS REQUIREMENTS:

2.29.10 When designing a proposal, consideration should be given to the need for appropriate access arrangements, including safety. This includes:

- Providing emergency service access<sup>27</sup> and refuse collections;
- Where emergency or service vehicle access is not possible, such as back land sites with narrow driveways, alternative service requirements should be discussed with the relevant authority;
- Where appropriate access and turning for refuse collection vehicles<sup>28</sup> is not possible, a refuse store must be provided within 20m of the street<sup>29</sup>. This point must be no more than 30m from the front door of the dwelling (excluding vertical distance) (Refer to Figure 2.29g);
- Where it is not possible to find a suitable location for the refuse store, the proposed development may be required to demonstrate how the refuse associated with the development will be available on the street on collection days, for example, through an established management company and management schedule for the development;
- Where a car free development is proposed, it may be possible to provide pedestrian only access where the appropriate set down space is easily accessible from the closest highway to meet access requirements<sup>30</sup>;
- Access into a building and

27 As per Building Regulations. Available at: [https://www.planningportal.co.uk/info/200135/approved\\_documents](https://www.planningportal.co.uk/info/200135/approved_documents).

28 Refer to Croydon Council's 'Waste and Recycling in Planning Document (2015)' for guidance, available at: <https://www.croydon.gov.uk/environment/rrandw>

29 As per Veolia waste collection standards.

30 As defined by Building Regulations.

individual units via circulation spaces should be designed to allow ease of access for all users. Consideration must be given to the accessibility of outdoor space and the provision of space for activities to occur outdoors which support the health and development of children (Refer to Figure 2.34a);

- Where a proposal on a rear garden or back land requires the use of a rear lane to access the development, this route ensures safety for users and residents through the use of lighting, high quality surfaces and overlooking. Where the location would prohibit any natural surveillance from a public highway or neighbouring properties over such an access route, proposals will generally not be acceptable.

## NEW STREETS

2.29.11 If the scale of a development requires a new street, where the new street meets an existing road, this should be designed in accordance with the relevant highways guidance available on Croydon Council's website<sup>31</sup> and the Public Realm Design Guide. Where this is the case the Council's Highways team should be consulted at an early stage.

2.29.12 The design of new streets and entrances should consider the safety of residents, avoiding over-engineered solutions that prioritise motorists and maximising the use of landscaping measures to control motor vehicle movement.

31 Available at: <https://www.croydon.gov.uk/transportandstreets>.

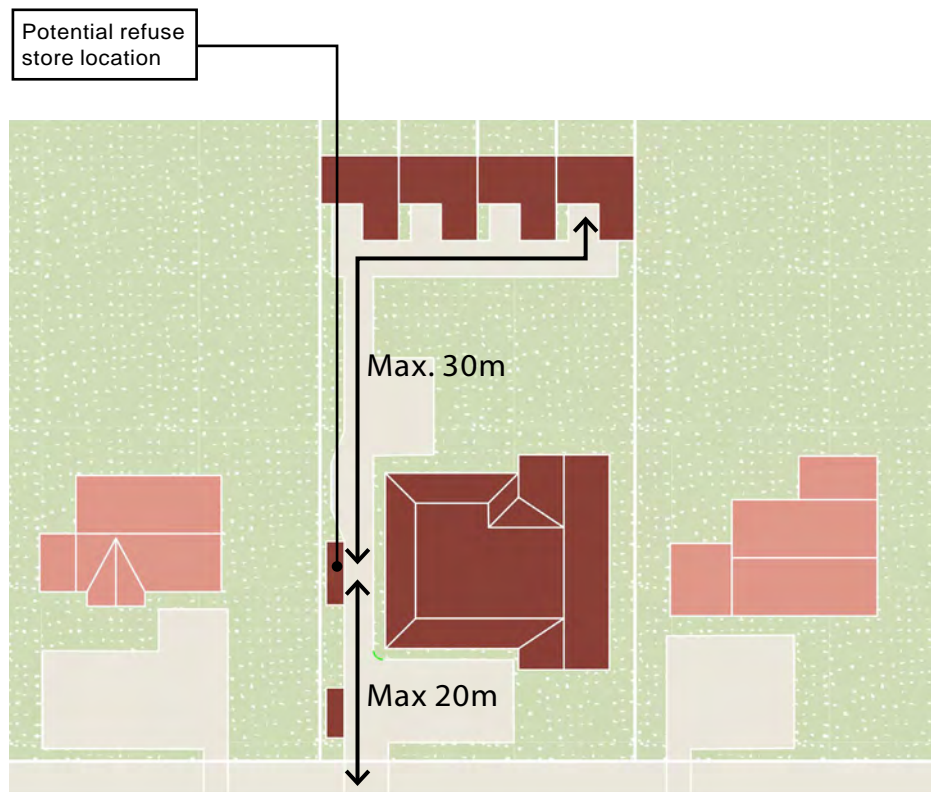


Figure 2.29g: Suitable location of bin stores on sites with limited access for refuse lorries.



**CONNECTING INTO THE EXISTING NEIGHBOURHOOD**

2.29.13 Where possible, development should seek to create pedestrian connections through suburban blocks, providing a thoroughfare that links between existing parallel streets. These will be encouraged where they create quicker access to transport services, parks and other amenities, and will be secured through planning agreements. Such connections should be designed to prioritise pedestrian movement and must ensure safety, including a good level of natural surveillance through overlooking

and optimised active frontages, along with the use of lighting and high quality surfaces.

2.29.14 These connections may require a development to obtain access to an existing shared access route outside the development site. Proposals should demonstrate that, where possible, they seek to provide connections through an agreement with neighbouring land owners.

2.29.15 Development should safeguard space to allow for future connections and avoid ransom strips.



Figure 2.29h: A new route created by a back land development is well lit, overlooked and has a legible destination.

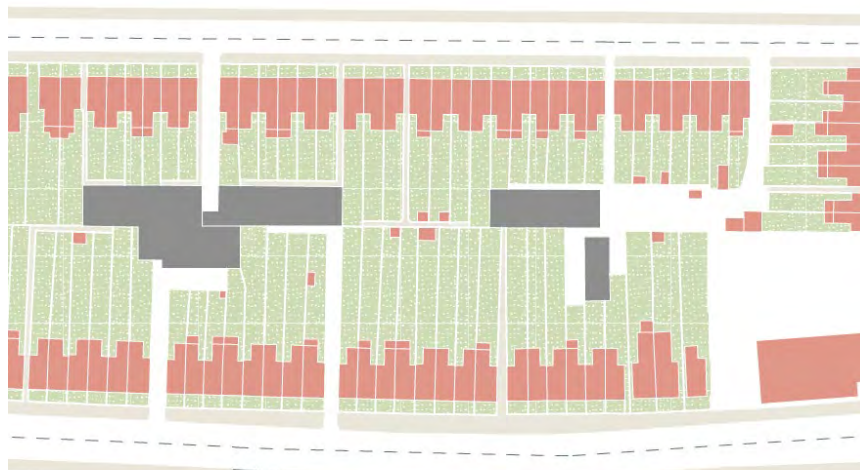


Figure 2.29i: Existing street pattern with back lands.



Figure 2.29j: New connections created through suburban block after a series of back land developments.

## 2.30 PARKING DESIGN

2.30.1 The provision of car parking associated with a proposed residential development can often lead to the loss of both front and rear gardens. The cumulative loss of gardens within suburban locations can greatly impact biodiversity, presenting issues associated with flood risk and air quality, along with health and wellbeing. The loss of front gardens to parking is particularly problematic in terms of negative impact on the street scene.

2.30.2 Policy DM10.2 of the Croydon Local Plan states that parking within the forecourt of buildings will only be acceptable where it would not cause undue harm to the character or setting of the building and where there is sufficient screening without the vehicle encroaching on the public highway.

### CAR PARKING

2.30.3 Car parking should be provided in a mixture of locations (including the front and rear of the property), thus reducing an overbearing and unacceptable amount of hardstanding in one location.

2.30.4 Car parking should only be accommodated in forecourts facing onto the street up to a quantum that is not considered to impact negatively on the street scene. Applicants will need to demonstrate this through an assessment of the prominence of forecourt parking within the existing street scene and include measures to mitigate impacts, such as mature planting. Car parking in forecourts must be set back from the front edge of the plot by at least 0.75m to provide for a boundary treatment (wall, fence or hedge) and landscaping (hedge, flower borders or grass).



Figure 2.30a: Poor design of parking without any landscaping; hardstanding dominates forecourt.



Figure 2.30b: The use of a basement for parking allows the front garden to remain predominantly planted.

2.30.5 In instances where the topography can be utilised to provide subterranean car parking, it will be looked upon favourably as it can reduce the need for parking in forecourts and rear gardens. However, creating it in other circumstances is recognised as expensive and may undermine the viability of development<sup>32</sup>.

2.30.6 Back land or rear garden development may utilise a courtyard arrangement where car parking can be concealed between built form or where garages can be introduced at ground level with accommodation above.

2.30.7 In some locations, as a result of a development additional parking may occur on the street. In these cases, assessed on a case by case basis, this may be acceptable where it is deemed safe by the Council's Strategic Transport officers and will not unreasonably impact on pedestrians or cyclists. This must be supported by a documented parking assessment demonstrating that there is kerbside capacity for car parking (using Lambeth



Figure 2.30c: Bays of parking separated by planting.

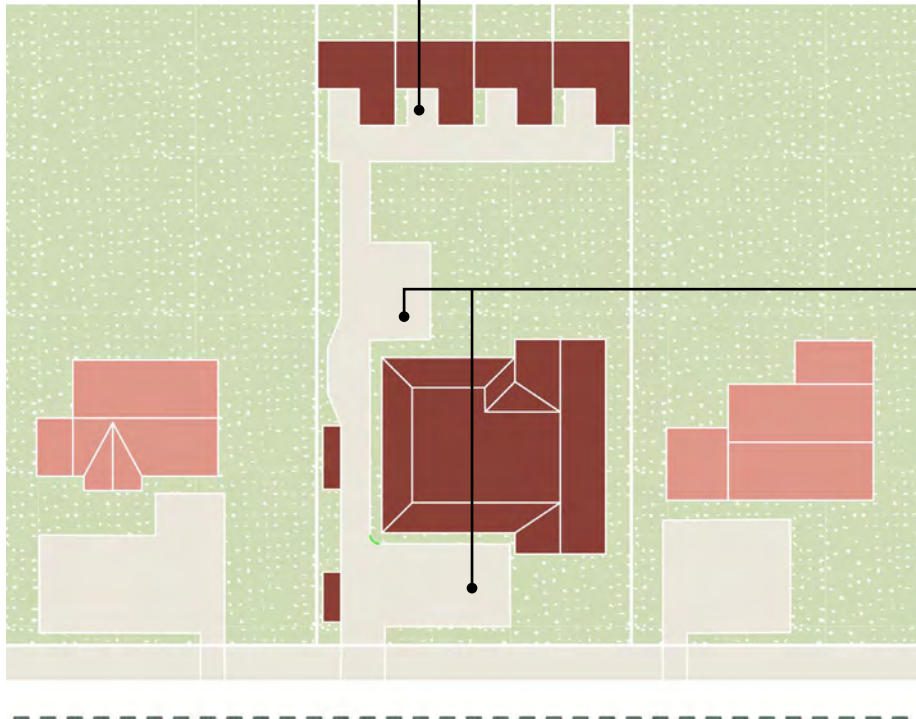
Methodology<sup>33</sup>). Parking on streets should not be through designated bays.

2.30.8 In areas of very low transport accessibility such as PTAL 0-1, it will be harder to access sustainable transport and therefore may be more difficult to reduce reliance on private cars. In these areas the Council will seek to accommodate all parking within the site (off street) and any anticipated need for on-street parking will be judged on a case by case basis.

<sup>32</sup> Basement car parking should be balanced against cost and will not be an acceptable grounds for the lack of affordable housing provision (where applicable to schemes of 10 or more units).

<sup>33</sup> Available at: <http://www.trafficsurveys.co.uk/lambeth-methodology.htm>

Parking in rear garden development incorporated into design to ensure it is discreet



Parking divided between front and rear of property to balance impact on streetscene and loss of rear gardens

Figure 2.30d: Indicative parking arrangement for a street facing and rear garden development.

2.30.9 In locations where there are significant additional demands on kerbside space and parking pressure, the Council may introduce or amend parking controls on roads within the area. Where this is proposed, this can be taken into account when considering a development proposal to encourage more sustainable travel choices and reducing car ownership. In these locations the Council can restrict the occupants of new developments from applying for on street permits and in appropriate locations with good PTALs make the development completely car free.

2.30.10 Parking should:

- avoid impeding access to outdoor amenity space from ground floor properties or shared doors;
- be screened with planting between and around bays and be informed by a landscaping plan which minimises visual

impact on the streetscene and neighbouring properties; and

- include within the design a flexible parking resource to accommodate motorbikes and microcars and smaller electric vehicles, or alternative future uses. Such flexible parking should recognise the changing sizes of and reducing demand for private vehicles.

2.30.11 Where existing lawns, planted areas and trees (soft landscaping) is lost to hardstanding associated with new development, including parking, this must be offset with appropriate landscaping and drainage systems (Refer to Section 2.36 for guidance).

2.30.12 Parking spaces within a development site should have dedicated electric vehicle charging provision in accordance with the London Plan minimum standards and the Croydon Local Plan, requiring the provision of active

spaces<sup>34</sup> and passive provision<sup>35</sup>.

2.30.13 The active provision should be in the form of a wall mounted charging point adjacent to the parking bay. Stand-alone charging point posts should be avoided wherever possible. Tethered cable charging points should be avoided unless the occupier's vehicle is known. The charging point should be able to provide two power rating options, either a "standard" 3kW or "fast" 7kW<sup>36</sup>.

<sup>34</sup> Active spaces are fully wired and connected, ready to use, points at parking spaces.

<sup>35</sup> Passive provision requires the necessary underlying infrastructure (eg capacity in the connection to the local electricity distribution network and electricity distribution board, as well as cabling to parking spaces) to enable simple installation and activation of a charge point at a future date.

<sup>36</sup> Further information is available at: <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/guidance-by-transport-type/electric-vehicle-charging-points#activation> and <https://www.zap-map.com/charge-points/charging-home/>.

## 2.31 ANCILLARY STORAGE FACILITIES AND BUILDINGS

2.31.1 Storage for refuse and cycles is an essential part of development and additional storage as part of domestic living is desirable. Where it is not feasible to incorporate storage facilities into the envelope of the building, they may be provided externally within a designed structure. Storage facilities whether within the envelope of the building or not, should be integrated into the design of a proposal from an early stage. New dwellings must provide suitable refuse and recycling, cycling and other ancillary storage facilities in line with Policy DM10 and DM30 - Cycling and Policy DM13 – refuse and recycling of the Croydon Local Plan.

2.31.2 Cycle and Refuse storage facilities should be designed to:

- Be of a capacity large enough for the development;
- Be of a secure, weatherproof and solid construction, with a material palette and design that responds to the design and material palette of the proposed development;
- Be secure on all sides;
- Be in an easily accessible location;
- For cycle storage, be in a well overlooked location;
- For refuse stores, be located in a visually discreet and easily accessible location. Generally, they should not be visible from the front elevation so as to avoid harm to the character of the building;
- Have minimal impact on the amenity of neighbours, including visual consideration, collection noise and odours associated with refuse;
- Where possible, make use of

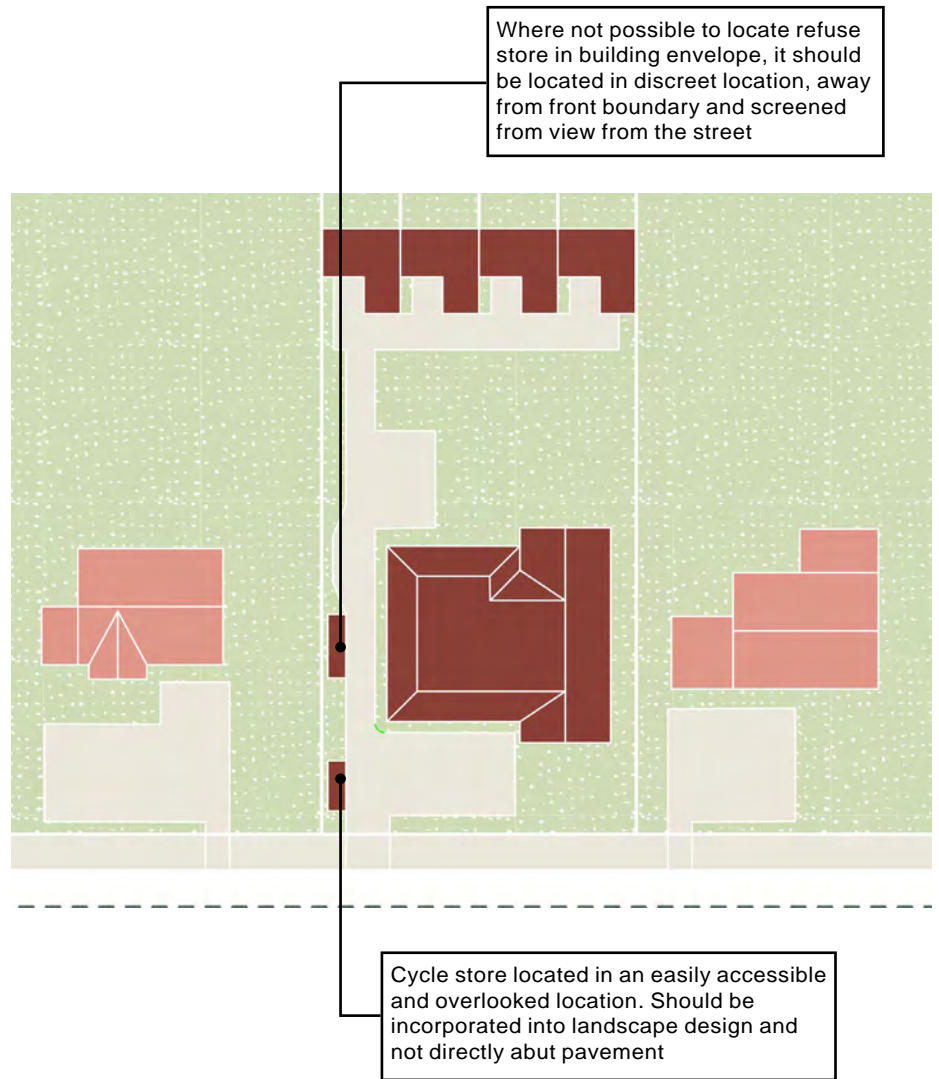


Figure 2.31a: Indicative refuse and cycle storage locations.

- subterranean storage;
- Where possible, be integrated into the landscape design;
- For cycle storage, it should be designed to allow occupants to choose how the space is used if they do not wish to store bicycles, providing the option to store other items;
- For cycle storage, does not require bicycles to be wheeled through living spaces;
- Be in addition and separate to the general storage provision required for each new dwelling.

2.31.3 Wherever possible, some provision for visitor cycle parking should be made. This is best provided with cycle racks or stands to the front of a property.

2.31.4 For more detailed information on refuse stores, refer to Croydon Council's technical guidance<sup>37</sup>.

2.31.5 The Council will, in exceptional circumstances, consider kerbside refuse, recycling and cycle stores for residential development only. This is only acceptable where these are designed so as to include public realm improvements to the street, potentially including planting that minimises visual intrusion. This is likely to be associated with conversions of residential units above shops, where the current

<sup>37</sup> Guidance is available at: <https://www.croydon.gov.uk/environment/rrandw/new-developments-and-conversions>.



Figure 2.31b: Refuse and cycle stores that are separate from the main building but integrated into the design of the proposal through the use of the same materials and architectural features. They are situated in a discreet location with minimal impact on the streetscene, neighbouring and residents outlook.



Figure 2.31c: Refuse stores in highly visible locations that are not integrated into the landscape design or any other aspect of the design.

lack of suitable refuse storage leads to waste presented in bags on the footpath, or a series of larger developments that are part of the wider regeneration of an area. In these circumstances, shared storage facilities are encouraged for efficiency and less impact on the visual amenity. These stores should be designed to ensure:

- They are secure and designed to prevent fly tipping;
- Where possible, they make use of subterranean storage;
- They use a material palette and design that responds to the

associated development and/or the surrounding context;

- They have minimal impact on the street scene through landscaping and other public realm improvements in the surrounding area.



Figure 2.32a: Successfully designed landscaping incorporating swales as part of the drainage strategy for the development of housing designed by Bell Phillips Architects. (Photo: Kilian O'Sullivan)

# LANDSCAPING & OUTDOOR AMENITY SPACE

## 2.32 LANDSCAPING

2.32.1 The provision of landscaping is particularly important to support Croydon's ecology and biodiversity, as well as providing important amenity to residents. Policy DM10.8 of the Croydon Local Plan sets out the landscape policy which requires proposals to seek to retain existing landscaping features that contribute to the setting and local character of an area. Where proposals would result in the loss of existing garden space, they must be cognisant of Policy DM10.4e of the Croydon Local Plan that seeks to protect from the unreasonable loss of outdoor amenity space.

2.32.2 Landscape plans should be considered early in the design of a scheme. Proposals with varied planting and features will contribute to the biodiversity of an area, as well as the visual amenity of a property and neighbourhood. This will add value to a development and its setting.



Figure 2.32b

## 2.33 PROTECTING BIODIVERSITY

2.33.1 Natural and maintained landscaping within the suburbs provides important habitats that contribute to biodiversity and environmental health of our neighbourhoods. All proposals must have regard to Policy SP7.4, DM27 and DM28 of the Croydon Local Plan which seek to deliver ecological restoration across the borough. Suburban development proposals should seek to achieve this by supporting and enhancing the biodiversity on individual sites through:

- In the first instance, retaining existing trees and planting.
- Only where the removal of existing landscaping is unavoidable, they are replaced with mature trees and planting. This will only be acceptable where the loss is outweighed by the benefits of a development. Replacement planting should be native species that will help enhance the natural biodiversity of the area. This applies to planting lost both within and outside a site boundary as a result of development.



Figure 2.32c

Figure 2.32b & 2.32c: Well landscaped communal areas with a variety of planting that add interest.

- Providing a wildlife area of natural landscaping within gardens. This may be ideally located to the rear of sites and should seek to be at least 3m deep to allow sufficient space to encourage natural habitats.
- Providing landscaping that incorporate a range of features. This should include a mixture of trees, hedges, shrubs, planted borders, grassed areas and where possible water features. This should be demonstrated in landscaping plans submitted at application stage and may be conditioned as part of an approval. Plans which do not balance the provision of grassed areas with other landscaping elements will generally not be acceptable.
- Providing greenroofs where a significant amount of existing landscaping is lost to hard standing and/or the footprint of the proposal. Applicants may be required to calculate and demonstrate on a plan the quantity of landscaping lost.

2.33.2 Applicants are advised to refer to the Urban Tree Manual which provides advice on selecting the right tree for the right location<sup>38</sup>.

<sup>38</sup> Refer to: <https://www.forestresearch.gov.uk/tools-and-resources/urban-tree-manual/>

## 2.34 DESIGN OF PRIVATE & SHARED OUTDOOR AMENITY SPACE

2.34.1 New dwellings should include outdoor amenity space as set out in policy DM10.4 of the Croydon Local Plan and:

- Where possible, is directly accessible from the dwelling. Where this is not possible, applicants will need to demonstrate this and provide shared outdoor amenity space in lieu.
- Where possible, provides outlook from habitable rooms.
- In exceptional circumstances where directly accessible private outdoor amenity space is not possible or would negatively impact the external appearance of the proposal, extra emphasis will be placed on the provision of high quality shared outdoor amenity space.
- Where shared outdoor amenity space is provided, units with direct access should include an area of semi-defensible private space.
- Where a shared outdoor amenity space is provided in lieu of directly accessible private outdoor amenity space, provide a large area of shared space, along with a series of

semi-private spaces allocated to each unit, as shown in Figure 2.34a. These should be open to the shared areas and may be bordered by low hedges and shrubs but should not be divided from the other garden areas with fences or high hedges.

- Shared outdoor amenity space should be designed to accommodate a series of different uses, with quieter seating areas along with family orientated areas, and should seek to include a mixture of grassed and planted areas as a minimum, and a shared patio area.
- Schemes over 10 units and all schemes containing flats must provide play space in accordance with Policy DM10.4 (d) of the Croydon Local Plan. Play space need not be provided with off the shelf equipment, but can often be better accommodated with natural play as part of the landscape design.
- Shared access to a garden shed or similar, along with a garden tap, are encouraged and should be provided to facilitate maintenance and ownership over the space by residents.

## 2.35 LANDSCAPE DESIGN ASSOCIATED WITH RETAINING WALLS & LARGE FLAT ROOFS

2.35.1 Retaining walls may be required on sloping sites. Where necessary, retaining walls should respond to the materials and design of the proposed development and should be integrated into the landscaping proposal. This may include stepped planting borders within the retaining wall. Large, blank retaining walls that impact the street scene or neighbouring amenity will not be acceptable.

2.35.2 Where large flat roofs cannot be avoided and are visible, landscape design should be used to make these less prominent as viewed from the streetscene and neighbouring habitable rooms. This may include the provision of a green roof and planting surrounding the built form to help reduce impact on visual amenity.



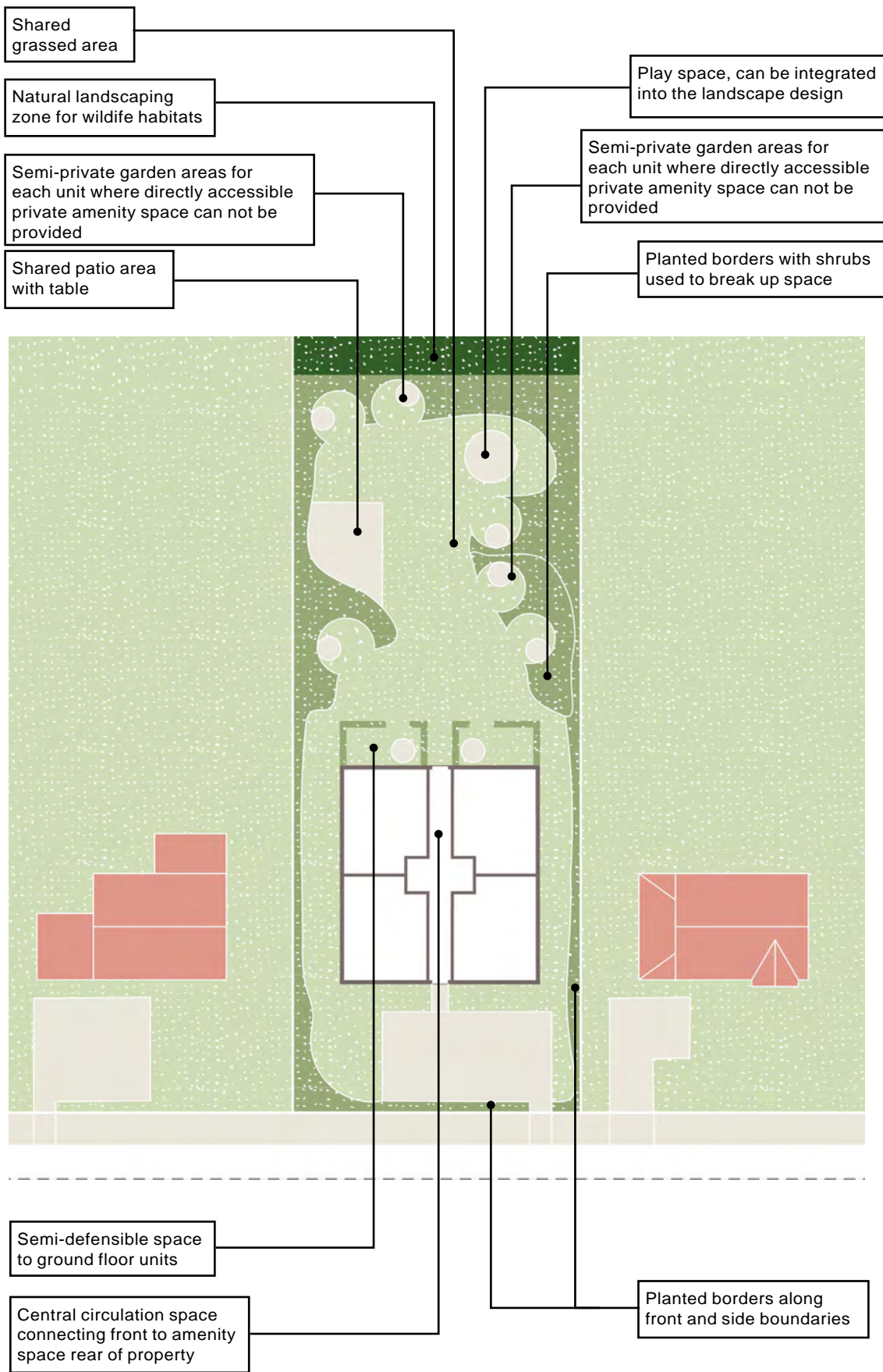


Figure 2.34a: Diagram for a typical shared amenity space

## 2.36 SUSTAINABLE DRAINAGE SYSTEMS (SUDS)

2.36.1 SuDS are an approach to managing surface water run-off which seeks to ensure that a proposed development is able to mimic natural drainage systems and retain water on the site, as opposed to traditional drainage approaches which involve piping water off site as quickly as possible. Where required, they should be integrated into the landscaping design at an early stage<sup>39</sup>. SuDS Designers are advised to use the Council's Sustainable Drainage - Design and Evaluation Guide<sup>40</sup>. The guide links the design of SuDS with the evaluation requirements of planning, in a sequence that mirrors the SuDS design process.

### WHY USE SUDS?

2.36.2 SuDS offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and quantity of surface water runoff from a site, promoting groundwater recharge and biodiversity benefits, as well as improving water quality and amenity value.



Figure 2.36a: Green roof designed by Hayhurst & Co.



Figure 2.36b: Trench with planting.  
(Photo: James Hitchmough)



Figure 2.36c: Stepped roof with planters designed by Hayhurst & Co.



Figure 2.36d: Drainage pond.  
(Photo: 2b Landscape Consultancy)

<sup>39</sup> See Council's Validation Checklist at: <https://www.croydon.gov.uk/planningandregeneration/make-application/validation-checklist> for details of a range of matters which applicants should be aware of when submitting planning applications.

<sup>40</sup> See advice on the Council's role as the Lead Local Flood Authority at: <https://www.croydon.gov.uk/environment/flood-water/advice-to-planning-applicants>.

## DESIGN OF SUDS

2.36.3 SuDS should be incorporated and integrated into the design of the landscape and buildings in suburban development to maximise landscaping and biodiversity opportunities. Appropriate options for SuDS in residential suburban developments include:

- **GREEN ROOFS:** A specially designed roof covering that absorbs water and attenuates flow to a drainage layer below.
- **FILLER TRENCHES AND DRAINS:** Shallow trenches filled with shingle and gravel to allow for temporary surface attenuation.
- **DRAINAGE SWALES AND PONDS:** Vegetated spaces that can be used to store excess water and may include an existing level of water and capacity provision. Drainage swales and ponds may also be included in a landscaping plan for development that is free from water except in case of flooding.
- **BIORETENTION SYSTEMS:** Contained, lowered landscaped areas or pre-fabricated units with soil and vegetation to reduce run-off.
- **PERMEABLE PAVING:** Permeable paving that allows water to filter down to the layer below and be discharged into a controlled drainage system.
- **RAINWATER AND/OR GREYWATER HARVESTING:** The easiest and most common form that can be provided is a household water butt, where it can be stored and used for gardening and other purposes at a later date. Greywater (water from showers, baths, basins etc.) needs to be treated if stored for any amount of time. This should be considered to achieve sustainability and building control objectives.



Figure 2.36e: Permeable paving.



Figure 2.36f: Water butts.

# CASE STUDIES

## 2.37 REGINA ROAD

2.37.1 A good example of a **proposal for a back land** development on a site which is highly constrained, narrowing at one end. The development proposes a larger block where the site is wider, containing flats, and then a series of 1 and 2 storey houses. The change in scale reflects the proximity to existing neighbours. The use of high-quality contemporary materials differentiates the proposal from its surroundings, with architectural form that reinterprets traditional suburban building types to create unique homes that respond to issues of overlooking.

2.37.2 For more information, visit the planning public access register on the Council's website, using case number: 16/06023/FUL. The scheme was designed by Stitch Studio for Brick by Brick.



Figure 2.37a



Figure 2.37b

## 2.38 MULBERRY LANE

2.38.1 A good example of a **sympathetic and faithful approach** on a rear garden site. Well-chosen materials and considered detailing responds to the surrounding architecture. The development sits within the East India Conservation Area adjacent to other intensification examples, including the conversion and extension of existing properties into flats.



Figure 2.38a

## 2.39 ONSLOW GARDENS

2.39.1 A good example of an **innovative and original approach** in a rear garden development. The development provides 2 new family homes in the rear gardens of existing properties, with access being provided by the existing driveway of one of the host dwellings. The form and material approach is contemporary and seeks to enhance the local character by deliberately distinguishing itself from the existing street facing development.

2.39.2 For more information, visit the planning public access register on the Council's website, using case number: 16/00455/P



Figure 2.39a



Figure 2.39b



Figure 2.39c

## 2.40 RUSHDEN & RAVENSDALE

2.40.1 An example of 3 adjacent sites delivering a total of 28 homes in place of existing garages. Each site within the proposal presents a positive approach to suburban intensification. The proposal for a 7-storey block of flats on the **corner site** makes the most of its prominent location within the streetscene. Homes of 2 and 3 storeys located to the rear of existing dwellings are of a scale that respond to their context.

2.40.2 For more information, visit the planning public access register on the Council's website, using case number: 16/06374/FUL. The scheme was designed by HTA Design for Brick by Brick.



Figure 2.40a



Figure 2.40b



Figure 2.40c: Site plan.

## 2.41 MELVILLE AVENUE

2.41.1 The redevelopment of a single dwelling into 6 flats within a 3 storey + basement dwelling. This proposal exemplifies a good **contemporary reinterpretation approach** to character through the use of high-quality contemporary architectural design that makes a contextually considered response to the site and neighbourhood characteristics. The units are large and carefully planned, with generous window sizes. The landscaping and roof terraces make the most of the topography of the site, providing well considered communal amenity spaces.

2.41.2 For more information, visit the planning public access register on the Council's website, using case number: 17/00720/FUL. The scheme was designed by MATA Architects.



Figure 2.41a



Figure 2.41b

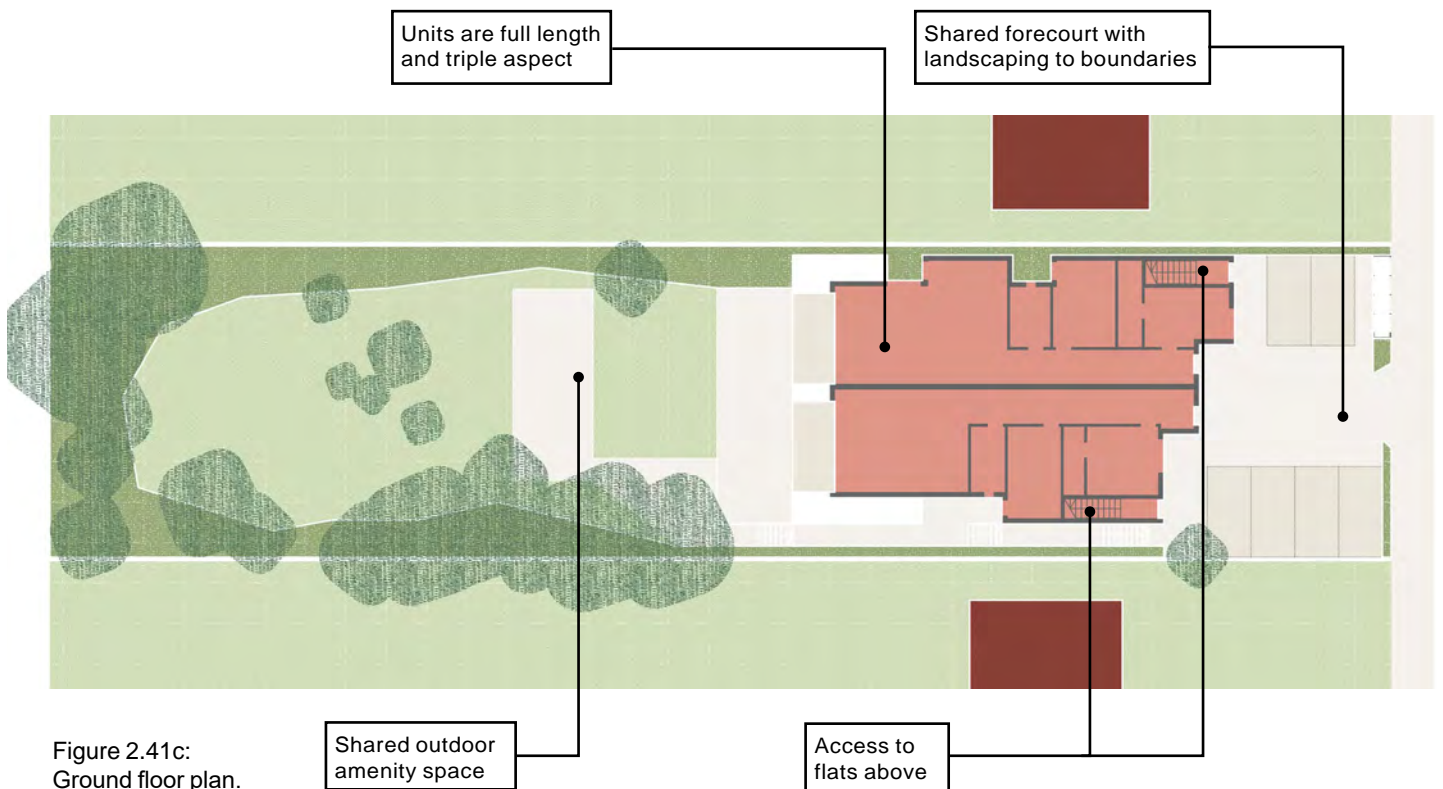


Figure 2.41c:  
Ground floor plan.

## 2.42 EAGLE HILL

2.42.1 The redevelopment of a constrained site formerly containing garages to provide 8 flats within a development that carefully steps down the site's steep topography. The homes are orientated around internal courtyards to bring light into deep plans and to prevent overlooking to neighbouring properties, whilst providing multiple outlooks. The building form is **innovative and original** but makes reference to the site's former use as garages.

2.42.2 For more information, visit the planning public access register on the Council's website, using case number: 16/06275/FUL. The scheme was designed by Coffey Architects for Brick by Brick.



Figure 2.42a



Figure 2.42b

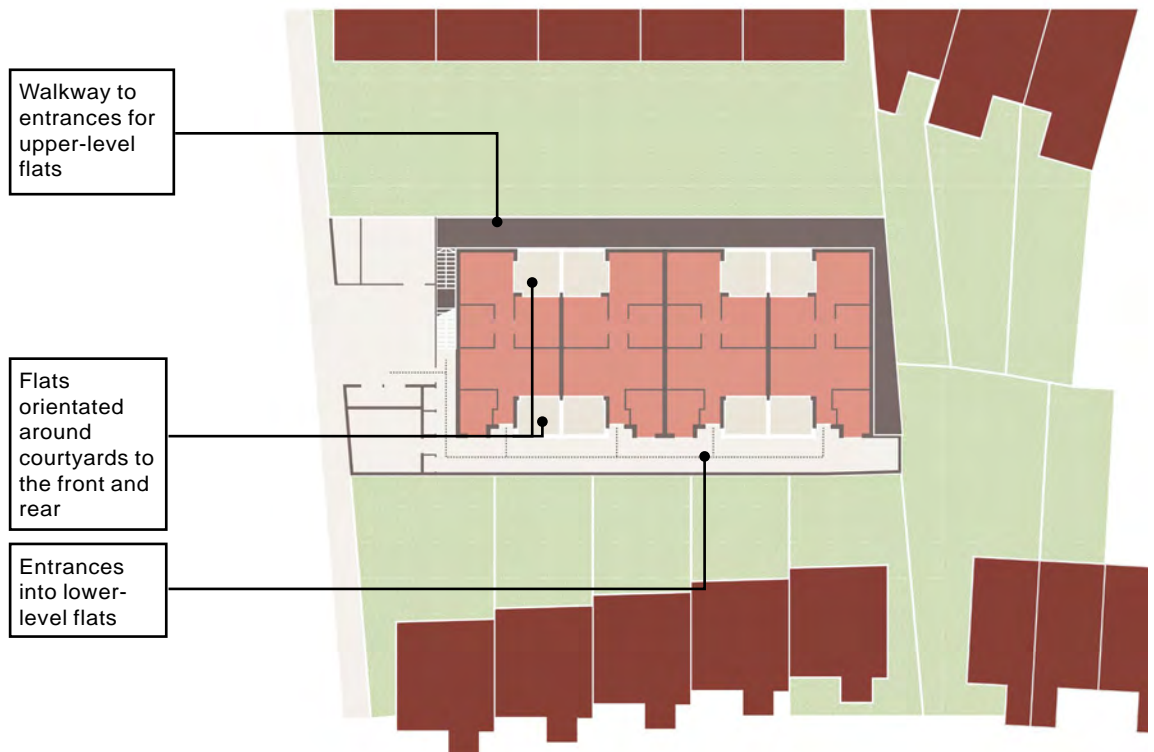


Figure 2.42c: Lower-level plan.



## 2.43 PAIR OF SEMI-DETACHED HOUSES

2.43.1 The redevelopment of 2 adjoining semi-detached properties, typically each being 3-bedroom dwellings. The proposal **optimises the site** to provide a high proportion of family-sized homes. There are 6 x 3-bedroom flats located in the street facing block, the third floor of which is partially contained within the roof-space. The rear garden development provides 2 x 2-bedroom houses that are inward facing so as not to prejudice development on neighbouring sites. The distribution of mass across the site reduces the impact of intensification on streetscape whilst providing a high percentage of family-sized units. The proposal that faces onto the street makes use of symmetry to respond to the context of the semi-detached street, with an enlarged building envelope to provide increased footprint to ensure the delivery of family-sized units. Parking is distributed across the site to minimise visual intrusion.

2.43.2 This is a designed scheme to highlight the possibility of such redevelopment.



Figure 2.43a



Figure 2.43b: Ground floor plan.

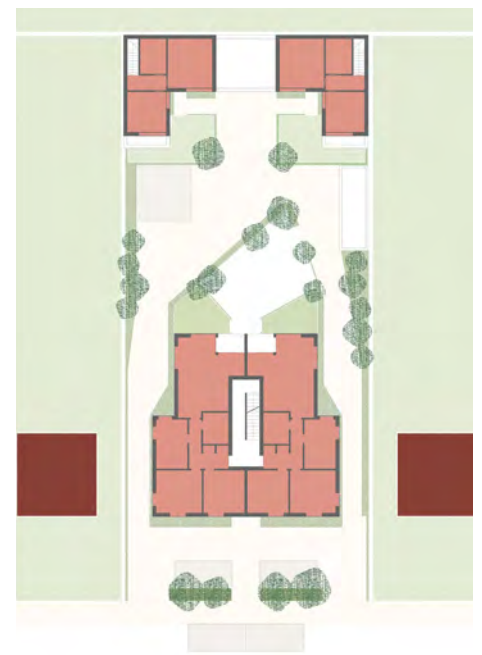


Figure 2.43c: First floor plan.

## 2.44 OVAL MEWS

2.44.1 Redevelopment of disused commercial/industrial buildings to provide 3 flats and 6 houses on an awkwardly shaped site with challenging overlooking issues. Where the proposal fronts the street it takes a **sympathetic and faithful approach**, matching materials and details to the neighbouring properties. To the rear, a mews style language is developed with a close-knit plan orientated around a shared access path. The layout ensures homes are dual aspect and have access to private outdoor amenity space.

2.44.2 For more information, visit the planning public access register on the Council's website, using case numbers: 5/01118/P. The scheme is a development by Chartwell Land & New Homes.



Figure 2.44a



Figure 2.44b

## 2.45 PURLEY DOWNS ROAD

2.45.1 A good example of the redevelopment of a single family house to provide 8 **family-sized homes**, each containing four-bedrooms. 2 houses face onto the road, with a further 6 houses set in the rear garden. The development is designed in a traditional style using high quality and robust materials that respond to the existing local architecture.

2.45.2 For more information, visit the planning public access register on the Council's website, using case number: 16/04186/FUL.



Figure 2.45a



Figure 2.45b



An isometric, aerial-style illustration of a city block. The scene is dominated by a large, multi-story grey building with a flat roof and several windows. To its right is a long, orange building labeled 'SCHOOL' in blue letters. In front of the school is a playground with colorful equipment. A red double-decker bus is driving on a road that curves through the block. Other buildings include a smaller grey building with a 'CAFE' sign and a 'SHOP' sign, and several red brick houses. The overall style is clean and modern, with a focus on urban infrastructure and community facilities.

# CHAPTER 3: AREAS OF FOCUSSED INTENSIFICATION

# INTRODUCTION

## 3.1 DESIGNATION IN THE CROYDON LOCAL PLAN

3.1.1 To achieve the current housing target of the Croydon Local Plan, the Areas of Focussed Intensification were identified from evidence which indicated that they were areas with established infrastructure but relatively low density and the potential to accommodate a significant increase in residential development to meet the borough's housing target. The areas of focussed intensification are:

- The area around **Kenley** station;
- The area around **Forestdale** Neighbourhood Centre;
- **Brighton Road** (Sanderstead Road) Local Centre with its setting; and
- Settings of **Shirley** Local Centre and Shirley Road Neighbourhood Centre.

3.1.2 Policy DM10.11 of the Croydon Local Plan provides the policy against which development in areas of focussed intensification should be assessed against. It states that *'Developments in focussed intensification areas should contribute to an increase in density and a gradual change in character. They will be expected to enhance and sensitively respond to existing character by being of high quality and respectful of the existing place in which they would be placed'*.

3.1.3 Furthermore, the Croydon Local Plan sets out how Croydon will accommodate growth and improvement through different methods, one of which being focussed intensification associated with change of area's local character. Specifically, supporting text 6.103 states that

*'focussed intensification aims to maximise the existing growth capacity through an increase in density of development and a gradual change in character to similar but higher density forms of development. Sites will be redeveloped with denser forms of development of a different character to that which exists in the local area currently as it would not be justified, when there is unmet housing need, to move towards a more consistent character that replicates surrounding low density development types'*.

3.1.4 New development in Areas of Focussed Intensification may be significantly larger than existing and should;

- a. Be up to double the predominant height of buildings in the area;
- b. Take the form of character types "Medium-rise block with associated grounds", "large buildings with spacing", or "Large buildings with Continuous frontage line";
- c. Assume a suburban character with spaces between buildings.

3.1.5 Policy DM10.11 further states that intensification will be supported in and around District, Local and potential Neighbourhood Centres which have sufficient capacity for growth due to the high availability of community services. Further growth can be accommodated through more efficient use of existing infrastructure.

3.1.6 The Areas of Focussed Intensification have been designated due to their capacity to accommodate development. As such, these areas could relieve development pressure on more sensitive locations in the borough, including conservation areas or protected open spaces. It is expected that the evolution

of these places will result in a managed change of their character over a period of 10-20 years to meet the housing need.

3.1.7 As stated in Policy DM10.11 set out previously, intensification is expected to enhance and sensitively respond to existing character. Elements which contribute positively to the character of each Focussed Intensification Area – including public spaces, community facilities and infrastructure, Heritage Assets and Locally Designated Views – should be preserved and enhanced, and new development should be designed to respond positively towards them. Development should therefore consider Listed Buildings, Locally Listed Buildings, views and the relationship to the Metropolitan Green Belt land.

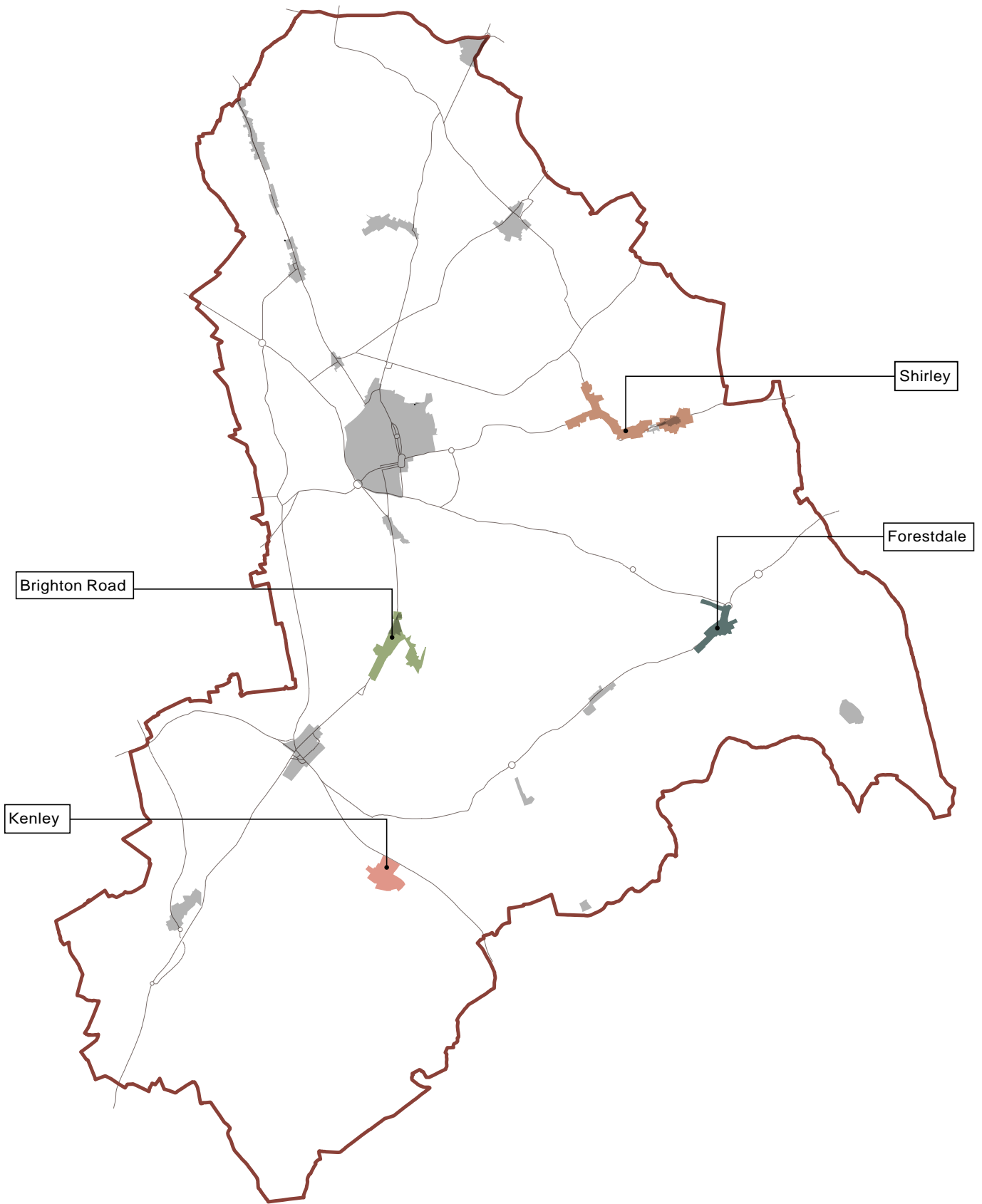


Figure 3.1a: Map of Croydon with Areas of Focussed Intensification highlighted and the Croydon Metropolitan Centre, District Centres and Local Centres shaded in grey which are all expected to accommodate intensification, along with Neighbourhood Centres where they have sufficient capacity for growth, in accordance with the Croydon Local Plan.

## 3.2 GENERAL GUIDANCE FOR AREAS OF FOCUSED INTENSIFICATION

3.2.1 Developments within the Areas of Focussed Intensification should primarily refer to the guidance within this chapter and, where relevant, refer to guidance within the previous chapter, 'Chapter 2: Suburban Residential Development'. The guidance on materials & external appearance, site layout & servicing, and landscaping & outdoor amenity space within Chapter 2 remain relevant. Policy DM10.11 of the Croydon Local Plan provides greater flexibility on massing and character for the Areas of Focussed Intensification than set out in Chapter 2, however it is still important that proposals develop an approach to character (refer to Section 2.7 & 2.8) that contributes to positive change and are aware of how the massing of a proposal will inform the future appearance of the area. All applications for residential extensions and alterations within the Areas of Focussed Intensification should refer to Chapter 4 for guidance.

3.2.2 As the number of residents increase in the areas, it provides the business case to improve and sustain services and facilities, providing tangible benefits that result from intensification. Whilst this guide is primarily a residential design guide and therefore cannot address all issues, the Council will seek opportunities to work with communities within the Intensification Areas to deliver this.

3.2.3 Beyond strengthening the provision of services, infrastructure and commercial offers in the areas, development should come forward in a manner that collectively promotes thriving, healthy and safe communities within the Intensification Areas. This includes contributing to biodiversity and recreational space through landscaping design both within private development sites and in the public realm in a manner that contributes to leafy suburban characteristics wherever possible.

3.2.4 The provision of sustainable transport facilities will be facilitated through transport improvement schemes such as the South Croydon Bus Review. Developments will be able to contribute to the development of sustainable transport options through promoting walking and cycling opportunities, for example in the design of access routes into a site and the provision of cycle storage as per the guidance in Chapter 2.

3.2.5 As demand on road infrastructure changes with reduced car ownership in line with national trends or where the need to address road safety issues emerges, the Council will seek to work with stakeholders and local communities to address these and wherever possible provide opportunities that will enhance the area.

3.2.6 The guidance in the following pages sets out a more detailed vision for each of the Focussed Intensification Areas and outlines indicatively the development potential within each area based on different building typologies. These building typologies are derived from the Croydon Typology Appraisal<sup>41</sup>. Applicants should refer to this for further information on the different typologies identified.

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<sup>41</sup> Available in the Urban Design, Local Character and Heritage section of the local plan evidence at: <https://www.croydon.gov.uk/planningandregeneration/framework>.



## EVOLUTION OF STREET WITH A MIXED CHARACTER IN AN AREA OF FOCUSED INTENSIFICATION

2019



Figure 3.2a: **2019** - Medium-rise blocks of flats with associated garages sit opposite Victorian terraces. A mixture of buildings of different ages, underutilised garages and hardstanding dominates the street scene.

2036



Fig 3.2b: **2036** - Garages are redeveloped to provide new homes, whilst the existing flats and terraces are retained. Landscaping improves the street scene and shared bike storage is provided.

**EVOLUTION OF A STREET WITH DETACHED & SEMI-DETACHED HOMES  
IN AN AREA OF FOCUSED INTENSIFICATION**

**2019**



Figure 3.2c: **2019** - A mixture of detached and semi-detached homes bring variation to this street, but there is no dominant typology, while large gardens and landscaping shape the streetscene.

**2036**

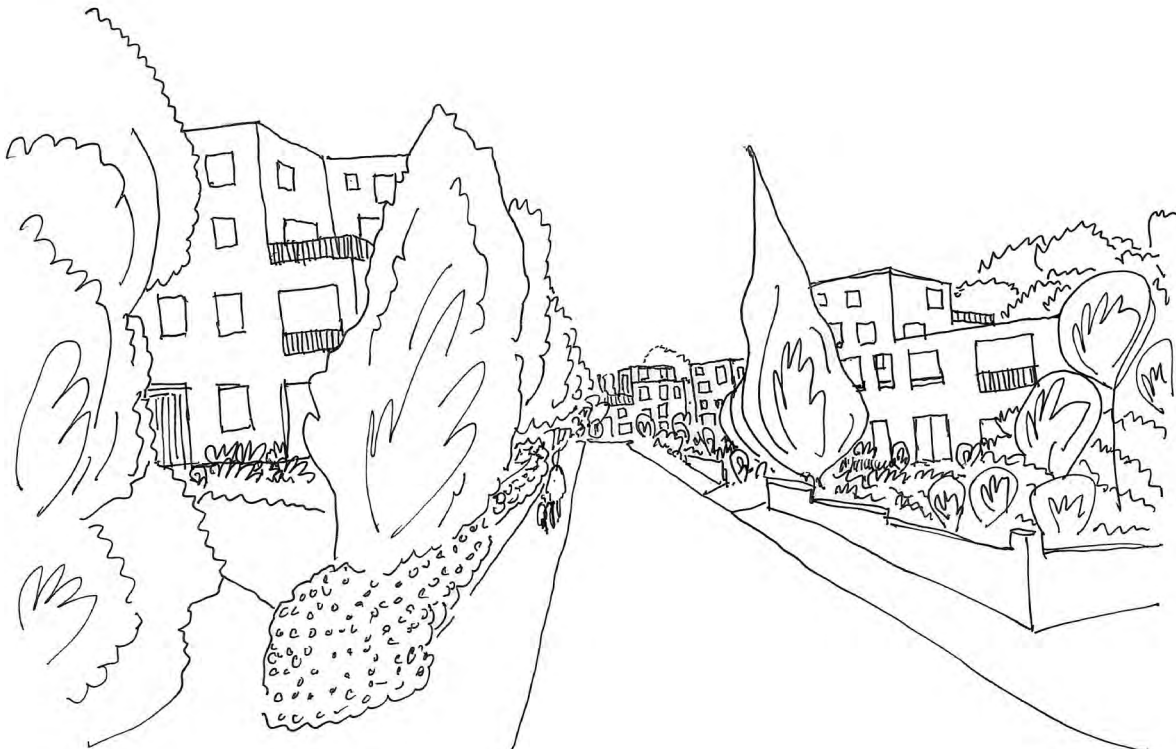


Figure 3.2d: **2036** - Redevelopment provides flats and townhouses set in generous gardens. The leafy character of the street is retained.

# EVOLUTION OF AN ARTERIAL ROAD IN AN AREA OF FOCUSED INTENSIFICATION

2019

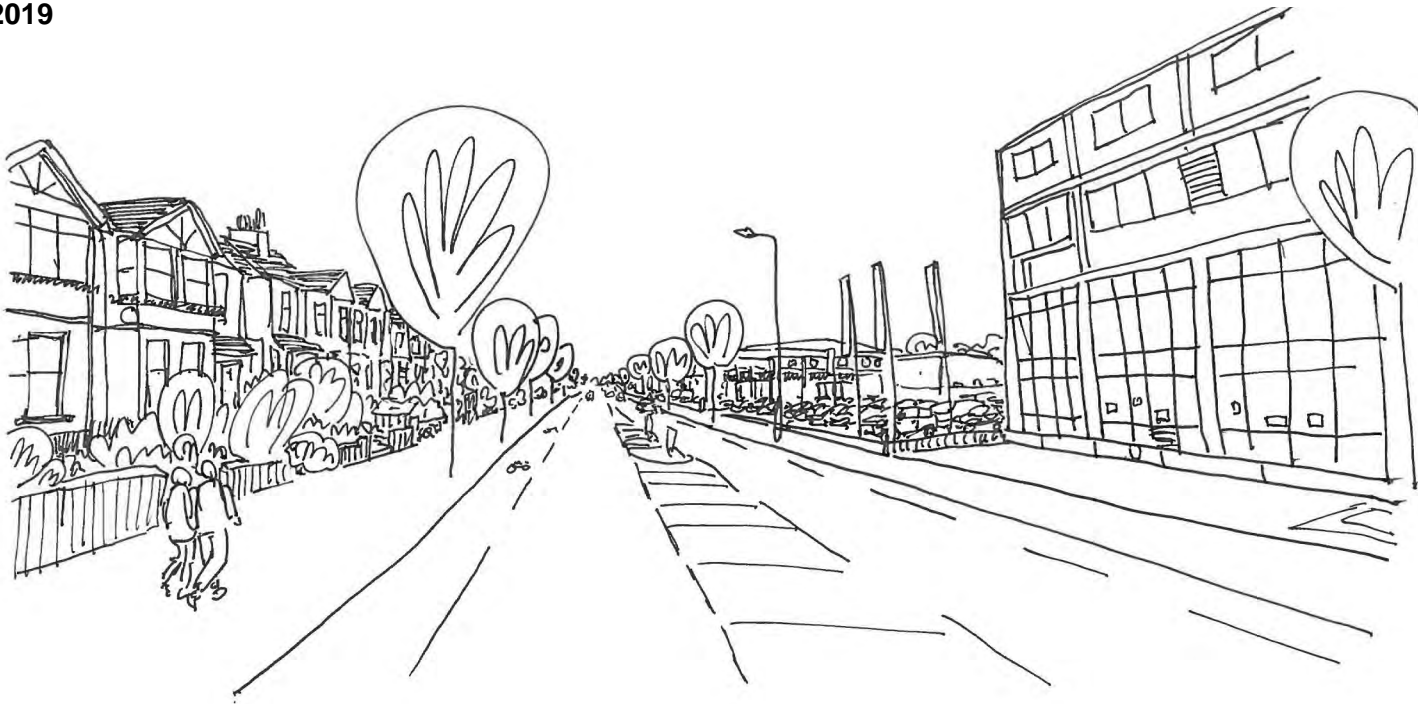


Figure 3.2e: **2019** - Housing occupies one side of the road, with a mixture of uses on the other. There is no predominant scale and the street scene is dominated by the road.

2036

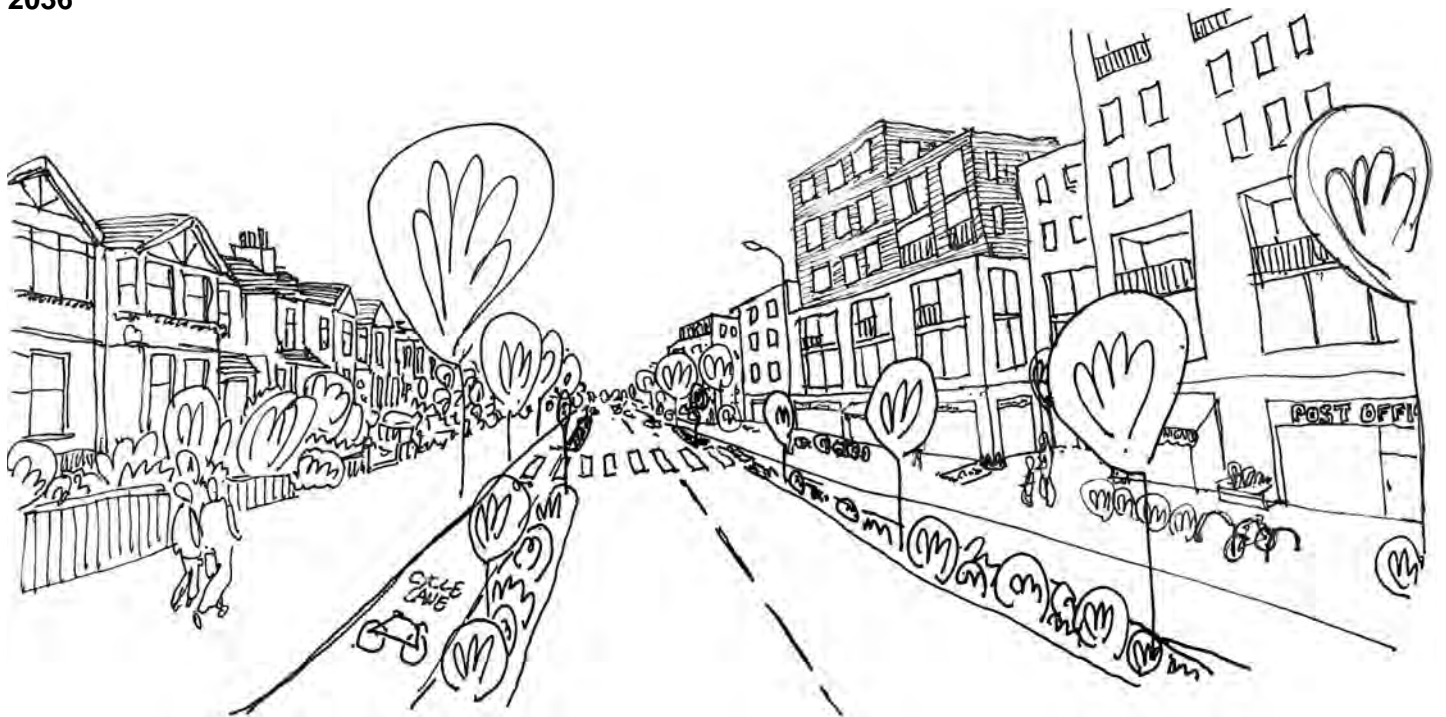


Figure 3.2f: **2036** - New developments of additional height provide an active road frontage, giving it a human scale and reducing the dominance of the road. Through interventions by the Council, or where relevant TfL, the thoroughfare is maintained but adjusted to provide public realm improvements to help prioritise pedestrian movement.

# KENLEY

## 3.3 INTENT OF THE KENLEY INTENSIFICATION AREA:

3.3.1 Redevelopment and development in the area (as designated in the Croydon Local Plan) should seek to provide additional housing and support an associated increase in population. This is proposed to be achieved through a variety of dwelling types and a revitalisation of local businesses and services along Godstone Road, providing long-term benefit to the community. Developments in Kenley should seek to maintain the leafy character of the area with increased focus around a regenerated village centre. The shopping parade, train station, church, nursery, GP surgery and memorial hall should be supported and improved as necessary to continue to provide important community services.



Figure 3.4a: Station Road.



Figure 3.4b: Corner of Kenley Lane and Welcomes Road.

## 3.4 AREA APPRAISAL

3.4.1 The area around Kenley Station identified for focussed intensification is characterised by predominantly scattered houses on large plots and overall has a green and leafy feel with a variety of building forms separated from the street. The area south of Kenley Lane, including Hayes Lane and Welcomes Road, a private road, is comprised of predominantly detached homes on relatively large plots. These plots typically include off-street parking by way of a garage and driveway. The topography of Hayes Lane is quite steep, with a significant slope further south into the intensification area. These residential plots back onto, and subsequently overlook the residential plots on Welcomes Road. Kenley Lane is also comprised of detached homes on large plots and runs parallel to the railway station before heading south and branching into Welcomes Road.

3.4.2 The western part of the Intensification Area has a largely suburban feel and includes Park Road and Oaklands which contains predominantly medium rise blocks with associated grounds as well as on-street parking and localised green space. Part of Oaklands is designated as a Site of Nature Conservation Importance; any development on this site must take account of this.

3.4.3 The area north of the train line includes some medium rise blocks with associated grounds along with terraced houses and cottages and a small strip of retail uses on Godstone Road. This is opposite the Riddlesdown greenbelt land, which provides significant recreational amenity to the area, including the Kenley Panorama. Any development

proposal should seek to protect and enhance this panorama.

3.4.4 The area is reasonably well accessed by public transport, including buses, and is walkable from Kenley train station. Public transport in the area is expected to improve as a result of the South Croydon Bus Review and improvements to the Brighton Main Line in the East Croydon area. There are however a number of road safety issues that result from local narrow lanes which lack pavements, along with gradients, blind corners and the humpback bridge over the railway. It is noted that the A22 is subject to a current TfL improvement proposal that seeks to address issues resulting from traffic, lack of pedestrian crossing, car parking aside the road and the junction with Hayes Lane. It is important that development seeks to reduce car reliance and there is the potential to introduce schemes, such as a Home Zone or Quiet Lane, that prioritise pedestrians. The safety of the lanes may also be improved by the provision of lighting.

3.4.5 There is an existing GP surgery, local schools, the Kenley Memorial Hall and local church which all contribute to the community and character of the area. The existing parade of shops also provides focus to the community and development should seek to enhance this offering.

3.4.6 Development in Kenley should seek to reduce flood risk as the area is prone to flooding with Station Road and Godstone Road being within Flood Zone 3. Any development proposals within the flood zone should refer to Policy DM25 and Table 8.1 of the Croydon Local Plan which require sequential and exception tests.

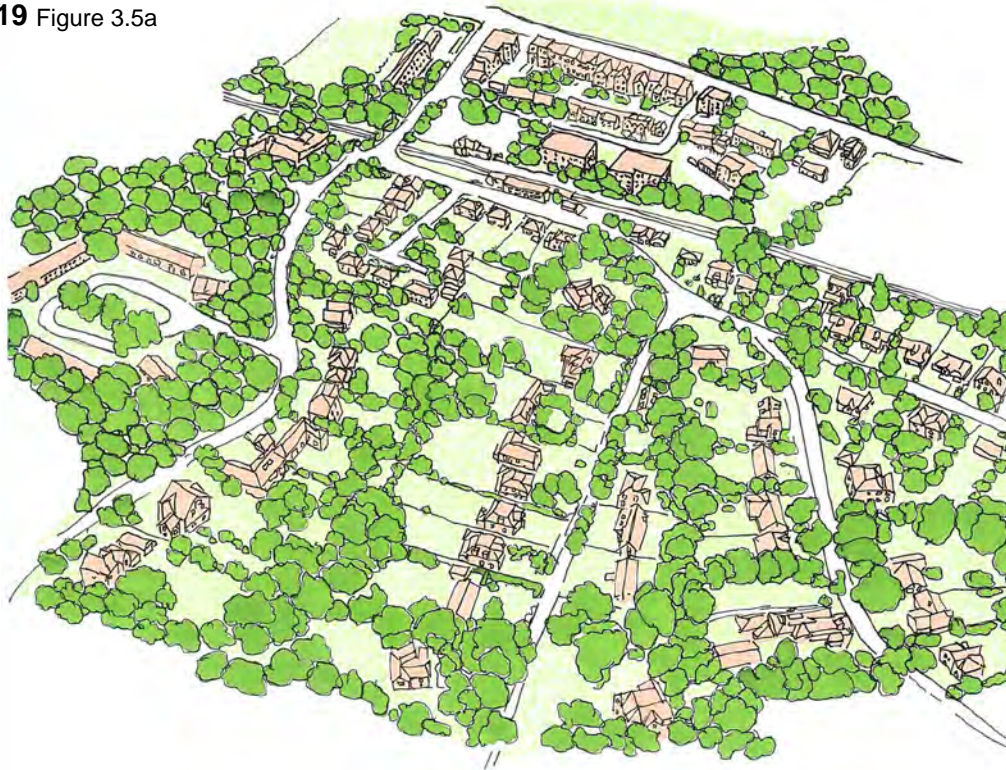


Figure 3.4d: Map with boundary of Kenley Intensification Area (As designated in the Croydon Local Plan).

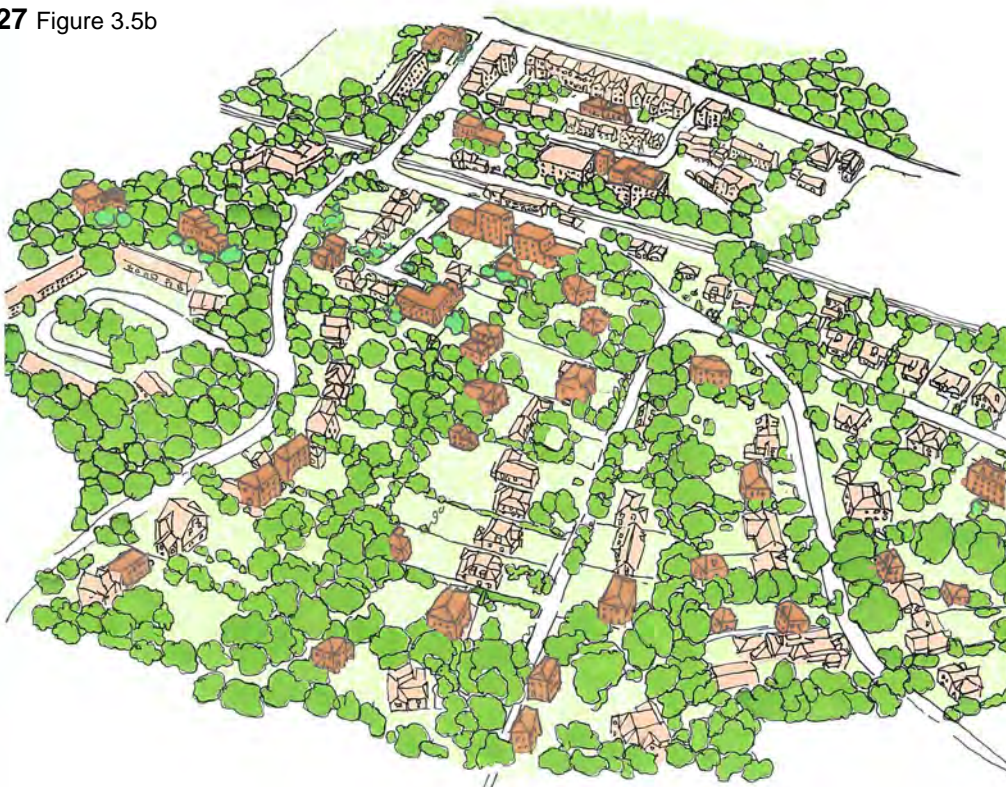
### 3.5 POTENTIAL DEVELOPMENT SCENARIO (KENLEY)

3.5.1 The scenario described in the following images is indicative and describes one potential way in which the area may be developed. Proposals within the area will be subject to consideration against the Croydon Local Plan, London Plan and this guidance document.

2019 Figure 3.5a



2027 Figure 3.5b



2036 Figure 3.5c



## 3.6 TYPOLOGY DEVELOPMENT POTENTIAL (KENLEY)

### MEDIUM-RISE BLOCKS WITH ASSOCIATED GROUNDS:

- Existing blocks of flats may be redeveloped or extended to provide up to 6 storeys in height where possible.
- Garages associated with these flats present opportunities for development to the same height as the blocks of flats themselves, where this would not unreasonably impact existing residents. Where necessary, garages at ground level may be maintained with accommodation provided above.
- A parking survey will be required to show that the loss of garage parking would not result in a negative impact on parking stress in adjacent roads. If this survey suggests that there will be an impact then the developer will be required to enter into a legal agreement restricting future occupiers from applying for an on street parking permit (Refer to Policy DM30(a) of the Croydon Local Plan). If the site is outside a controlled parking zone then the development will be expected to accommodate parking on site.
- Proposals for existing low & medium-rise blocks should seek to minimise the amount of hardstanding land onsite and introduce a greater amount of landscaping to prioritise pedestrians over vehicles.

### AREAS OF TERRACED HOUSES, COTTAGES & COMPACT HOUSES:

- These housing typologies should be preserved to maintain the character of the area. There may be scope for additional accommodation within roofs, with dormer windows to the front and box extensions to the rear roofs.
- In some instances, these typologies may allow for mews style development to occur.

### AREAS WITH SUBURBAN SHOPPING & LINEAR INFRASTRUCTURE:

- The retail and service function of Kenley Neighbourhood Centre should be maintained and enhanced with greater provision of local amenities. The public realm may benefit from both soft and hard landscaping improvements, along with rejuvenated shopfronts and the provision of outdoor seating associated with cafes and restaurants.
- Accommodation above shops is encouraged and the conversion of roof spaces into acceptable habitable rooms is supported, where it does not have a negative impact on the operation and viability of retail units or other employment functions. There may be scope for additional accommodation within roofs, with smaller dormer windows to the front and larger box extensions to rear roofs.
- Car parks may present some development opportunity to provide mixed-use schemes, provided the required quantum of parking is maintained (Refer to Policy DM30 and DM31 of the Croydon Local Plan).
- Social infrastructure and community services should be

accommodated as part of the sustainable growth of the area.

### SCATTERED & DETACHED HOMES:

- Developments of 4 storeys will generally be acceptable.
- Smaller plots may provide opportunities to merge with neighbouring sites to form large, comprehensive and coherent development sites; this approach would be encouraged to aid the delivery of affordable housing. Where applicable, these must meet the affordable housing requirements in accordance with Policy SP2.4 of the Croydon Local Plan.
- Where plots are subdivided to create rear garden development, these applicants should consider the development potential of the neighbouring rear gardens and the potential to create a larger site with one comprehensive development proposal. Where there is neighbouring development potential but sites do not come forward in one application, the proposed development should be designed to ensure future access can be accommodated from the access route to the first rear garden development<sup>42</sup>.
- Development proposals must consider the topography carefully to ensure appropriate access and minimise the use of retaining walls (Refer to Section 2.35 for guidance).
- These plots currently provide significant landscape amenity and contribute to the biodiversity of the area. As such the significant loss of landscaping will not be accepted and must be balanced with re-provision of

<sup>42</sup> Such approvals may be subject to conditions to secure this.



high quality mature planting of native species which will support the local ecology and should be demonstrated on plans provided as part of the development application. Applicants should refer to Sections 2.32-2.36 in Chapter 2.

- Developments accessing onto narrow lanes without pavements should provide a 1.5m buffer strip along the front of the site directly adjacent to the road, allowing greater space for pedestrians, cyclists and passing vehicles. This area should not be planted with shrubs or trees

or enclosed from the road, and may function best as a grass verge or gravelled area. This may require a reworking of landscaping to the front of properties to bring the boundary treatment away from the road. Any lost planting should be reprovided within the scheme.

- Where individual plots are developed into multiple units or there is a loss of parking/ garage block, the Council may require a parking survey to show that it will not result in a negative impact on parking stress in adjacent roads. If there is deemed to be a

negative impact on parking stress then the Council may seek to minimise the overall impact of parking demand on the adjacent roads by requiring the developer to enter into a legal agreement restricting future occupiers from applying for an on street parking permit in the Controlled Parking Zone (CPZ), as per Policy DM30a of the Croydon Local Plan in areas of PTAL 4 and above or in areas of parking stress. If there is evidence of parking stress and the site is outside a CPZ then the development will be expected to accommodate parking on site.



Figure 3.6a: Hayes Lane.

# FORESTDALE

## 3.7 INTENT OF THE FORESTDALE INTENSIFICATION AREA:

3.7.1 The area around Forestdale Neighbourhood Centre (as designated in the Croydon Local Plan) provides opportunity for intensification and revitalisation to create a better public realm surrounded by shops and services, to support new and existing homes. By anchoring development around the existing neighbourhood centre and the Forestdale Centre on Selsdon Park Road, there is an opportunity to enhance the suburban village heart to service greater development. Development should seek to maximise underutilised land to deliver an increased housing density with a suburban feel.



Figure 3.8a The Forestdale Centre.



Figure 3.8b: Shopping Parade.

## 3.8 AREA APPRAISAL

3.8.1 The area around Forestdale Neighbourhood Centre identified for intensification is a mix of character typologies supported by small-scale suburban shopping areas. Gravel Hill and the eastern side of Selsdon Park Road are typified by semi-detached houses. Whilst the topography along Gravel Hill nearest to the roundabout is gentle, the semi-detached homes along Selsdon Park Road are on plots which slope away from the road, providing opportunities to use the topography to maximise development.

3.8.2 The existing Shopping Parade on Selsdon Park Road is set back from the dual carriageway, with a slip-lane for access. The ground level retail includes residential accommodation above, with large backlands accessed via a rear lane. The Forestdale Centre, located to the south of the road junction between Selsdon Park Road and Featherbed Lane, provides further retail offer. These two shopping areas are disconnected and dominated by the dual carriageway and car parking. Through revitalising the public realm and delivering mixed-use schemes, there is an opportunity to create a heart in the area that prioritises pedestrians



Figure 3.8c: Selsdon Park Road.

and encourages the wider community to utilise its services.

3.8.3 There are two (2) fuel stations within the Intensification Area, servicing different directions of traffic. The service station at the Selsdon Park Road roundabout occupies a prominent corner and road frontage, separating the semi-detached homes on Gravel Hill from the terraced houses south along the main road. This corner could better define the street and contribute to a developing character for the area. The Esso service station on the southern side of Selsdon Park Road creates a separation between the neighbourhood centre retail, including The Forestdale Arms, and the medium rise blocks to the west along the main road. These blocks of flats occupy large associated grounds, providing potential for increased development in terms of density and intensity that could deliver greater definition to the main road.

3.8.4 The plots on the eastern side of Featherbed Lane within the intensification area include a variety of houses and services with an inconsistent typology. Accessed by a separate carriageway, this area provides an opportunity to allow connections into the Metropolitan Greenbelt for recreational use. It will be important to strengthen pedestrian links from the Neighbourhood Centre across Featherbed Lane to this location.

3.8.5 The area is served by a number of schools, along with a GP surgery, three bus routes and access to the tram from Gravel Hill. Improvements to infrastructure are set out in the Croydon Infrastructure Delivery Plan.



Figure 3.8d: Map with boundary of the Forestdale Intensification Area (As designated in the Croydon Local Plan).

# 3.9 POTENTIAL DEVELOPMENT SCENARIO (FORESTDALE)

3.9.1 The scenario described in the following images is indicative and describes one potential way in which the area may be developed. Proposals within the area will be subject to consideration against the Croydon Local Plan, London Plan and this guidance document.

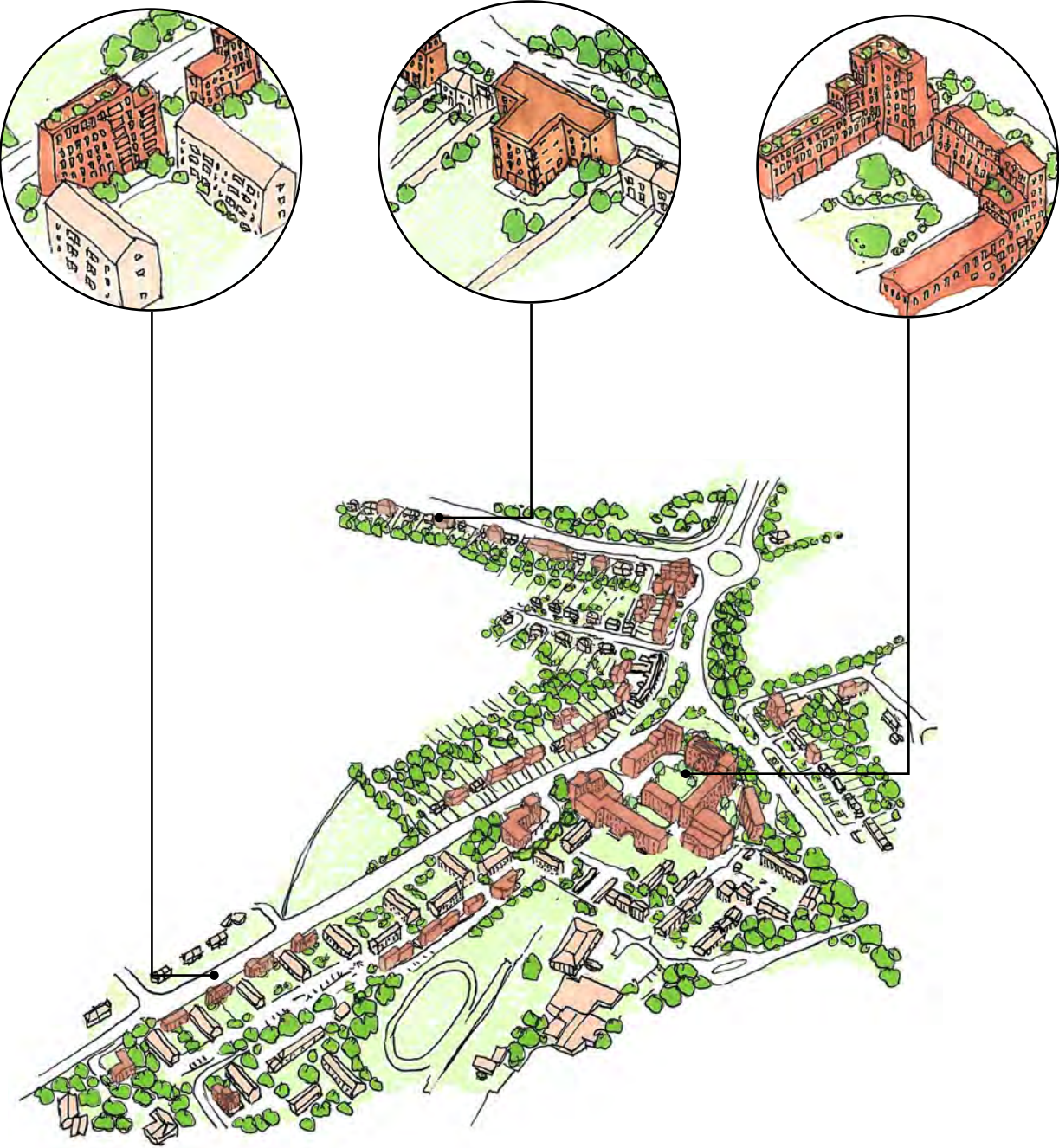
2019 Figure 3.9a



2027 Figure 3.9b



2036 Figure 3.9c



## 3.10 TYPOLOGY DEVELOPMENT POTENTIAL (FORESTDALE)

### SEMI-DETACHED HOUSES:

- Pairs of semi-detached houses may be developed together to provide large developments of flats, maisonettes or terraces. These should seek to provide up to 4 storeys of accommodation, one of which is accommodated in the roof.
- Where possible, proposals may seek to amalgamate 4 or 6 houses (i.e. 2 or 3 pairs of semi-detached houses) in a row to create larger developments which respond to topography. Applicants should refer to the guidance for building across boundaries where this is proposed (Refer to Section 2.15 for guidance).
- Where there is an inconsistent ridge line and change in topography, additional height may be accommodated and, where possible, provide basements and undercroft parking to utilise the slope of the land. Large retaining walls should be avoided. Ramps leading from undercroft parking onto the public highway must be well set back from the back of the footway and the ramp levelled off before a vehicle gets close to the public highway to ensure clear visibility and the safety of pedestrians on the footway at all times.
- Large gardens provide opportunities for rear garden development. These can be accessed by driveways created along the side of the existing houses, particularly where neighbouring properties have similar potential. In these circumstances, the

proposed development should be designed to ensure future access can be accommodated from the access route to the first rear garden development.

### TERRACED HOUSES AND COTTAGES:

- Where a set of terraced houses can be redeveloped comprehensively, there is potential for increased development of up to 4 storeys of accommodation, one of which is accommodated in the roof.
- Terraced houses also provide opportunities to create back land developments up to 2 storeys where garages to the rear exist.
- Where individual plots are developed into multiple units, the Council will seek to minimise the overall impact of parking demand on the adjacent roads by restricting permission to apply for on street permits in controlled parking zones.

### SHOPPING PARADE (NORTH OF SELSDON PARK ROAD):

- The Shopping Parade should be maintained in terms of use and appearance, without inhibiting the potential for public realm improvements including better connections across to the Neighbourhood Centre and green belt.
- Development should maintain the retail units and encourage additional residential storeys through the provision of small dormer windows to the front roof and box extensions to the rear roofs.
- Underutilised land to the rear of shopping parades may be considered for back land developments of up to

2 storeys, where it does not compromise the functionality of the Shopping Parade or centre.

### NEIGHBOURHOOD CENTRE:

- The existing Neighbourhood Centre provides an opportunity to create a central village that includes residential provision, in the form of ground floor retail with 4-5 storeys of residential accommodation above.
- Development should help to define the public realm and strengthen the positive characteristic of the neighbourhood centre, providing a stronger frontage to Selsdon Park Road and Featherbed Lane, and establishing pedestrian connections to the shopping facilities and houses across these roads.
- Where car parking is provided, it should not dominate the environment and should be discreetly located, including in basement car parking where possible.
- Development should safeguard or re-provide pedestrian routes into the Neighbourhood Centre, ensuring they are well overlooked, with good surfaces and lighting, to ensure safety.

### MEDIUM RISE BLOCKS WITH ASSOCIATED GROUNDS:

- Land associated with these blocks provide amenity space along with opportunities for intensified development to create a stronger frontage along Selsdon Park Road and a better connection into the neighbourhood centre. Any development should respond to the setting of the existing blocks and not significantly reduce the amount of existing amenity space.

- Garage sites may be considered for development but should seek to minimise the substantial loss of garden areas.
- Where there is a loss of garages, the Council may require a parking survey to show that it will not result in a negative impact on parking stress in adjacent roads. If there is deemed to be a negative impact on parking

stress then the Council may seek to minimise the overall impact of parking demand on the adjacent roads by requiring the developer to enter into a legal agreement restricting future occupiers from applying for an on street parking permit in the Controlled Parking Zone (CPZ), as per Policy DM30a of the Croydon Local Plan, in areas of PTAL 4 and above or in areas of parking stress.

- If there is evidence of parking stress and the site is outside a CPZ then the development will be expected to accommodate parking on site.
- Development must be considerate of adjoining uses and ensure issues of overlooking and safety are mitigated.



Figure 3.10a: View across part of the Forestdale Intensification Area.

# BRIGHTON ROAD

## 3.11 INTENT OF THE BRIGHTON ROAD (SANDERSTEAD ROAD) INTENSIFICATION AREA:

3.11.1 Developments in the Brighton Road (Sanderstead Road) Local Centre (as designated in the Croydon Local Plan) should seek to develop the sense of place where it is diminished by the busy nature of Brighton Road and under-utilised plots. Redevelopment in the Intensification Area should deliver increased housing density, supported by an active and vibrant local centre of mixed uses and recreation areas in conjunction with the existing recreation ground. Development should encourage public transport connections, utilising the opportunity to deliver developments of greater height with active frontages along the main roads.



Figure 3.12a: Vacant buildings and commercial uses along Brighton Road.



Figure 3.12b: Terraced houses along Purley Road.

## 3.12 AREA APPRAISAL

3.12.1 The Brighton Road Focused Intensification Area is a mix of residential, local retail, light industrial and car parking. The houses along Brighton Road are predominantly close-knit, Victorian, semi-detached homes, interwoven with other typologies and scales of development. Away from Brighton Road, the area is characterised by low density residential development on suburban streets, intermixed with small cafes, shops and community uses.

3.12.2 The upper half of Brighton Road within the Intensification Area is characterised by clusters of denser, high street parades which stretch along a large length of Brighton Road. This is at the heart of the Local Centre, where Brighton Road meets Sanderstead Road, and presents significant opportunity to improve the public realm and provide development to create a vibrant local centre that is attractive to the broader community, with the Locally Listed Red Deer Public House building at its centre.

3.12.3 The lower half of Brighton Road contained within the Intensification Area is predominantly low-rise, light industry intermixed with residential housing. While outside the focussed area boundary, the large recreation ground nearby provides an opportunity for intensified development to overlook open space, creating a park and village green at the heart of the Intensification Area.

3.12.4 The area along Sanderstead Road either side of the railway tracks is leafier than the rest of the Intensification Area. The width of the road and presence of cafes and shops

gives the area a village feel. Development should seek to exploit the opportunity presented by under-utilised areas of grounds associated with medium-rise blocks and back lands to provide new housing.

3.12.5 The area is well-connected and easily accessible by public transport providing the opportunity to create new developments of greater density. However, the area has a distinct lack of character with large pockets without a sense of place, and is severed by the existing transport infrastructure. Public realm improvements should seek to establish a unified character to help tie new and existing development together and create connections across the existing road and rail infrastructure. This should help establish an area that is identifiable through character and services, while providing intensified development along the main routes and elsewhere within the area.

3.12.6 There are a number of developments underway or subject to planning permissions in the area, providing a mix of uses that will deliver new homes along with commercial and retail offers.

3.12.7 Development should seek to reduce flood risk recognising the Flood Zone 3 designation running along the Brighton Road. Any development proposals within the flood zone should refer to Policy DM25 and Table 8.1 of the Croydon Local Plan.

3.12.8 The area provides a good level of employment spaces, along with community facilities. Where proposals seek to redevelop these, they must conform to the Croydon Local Plan policies which seek the re-provision of such floorspace.





Figure 3.12c: Map with boundary of Brighton Road Intensification Area (As designated in the Croydon Local Plan).

# 3.13 POTENTIAL DEVELOPMENT SCENARIO (BRIGHTON ROAD)

3.13.1 The scenario described in the following images is indicative and describes one potential way in which the area may be developed. Proposals within the area will be subject to consideration against the Croydon Local Plan, London Plan and this guidance document.

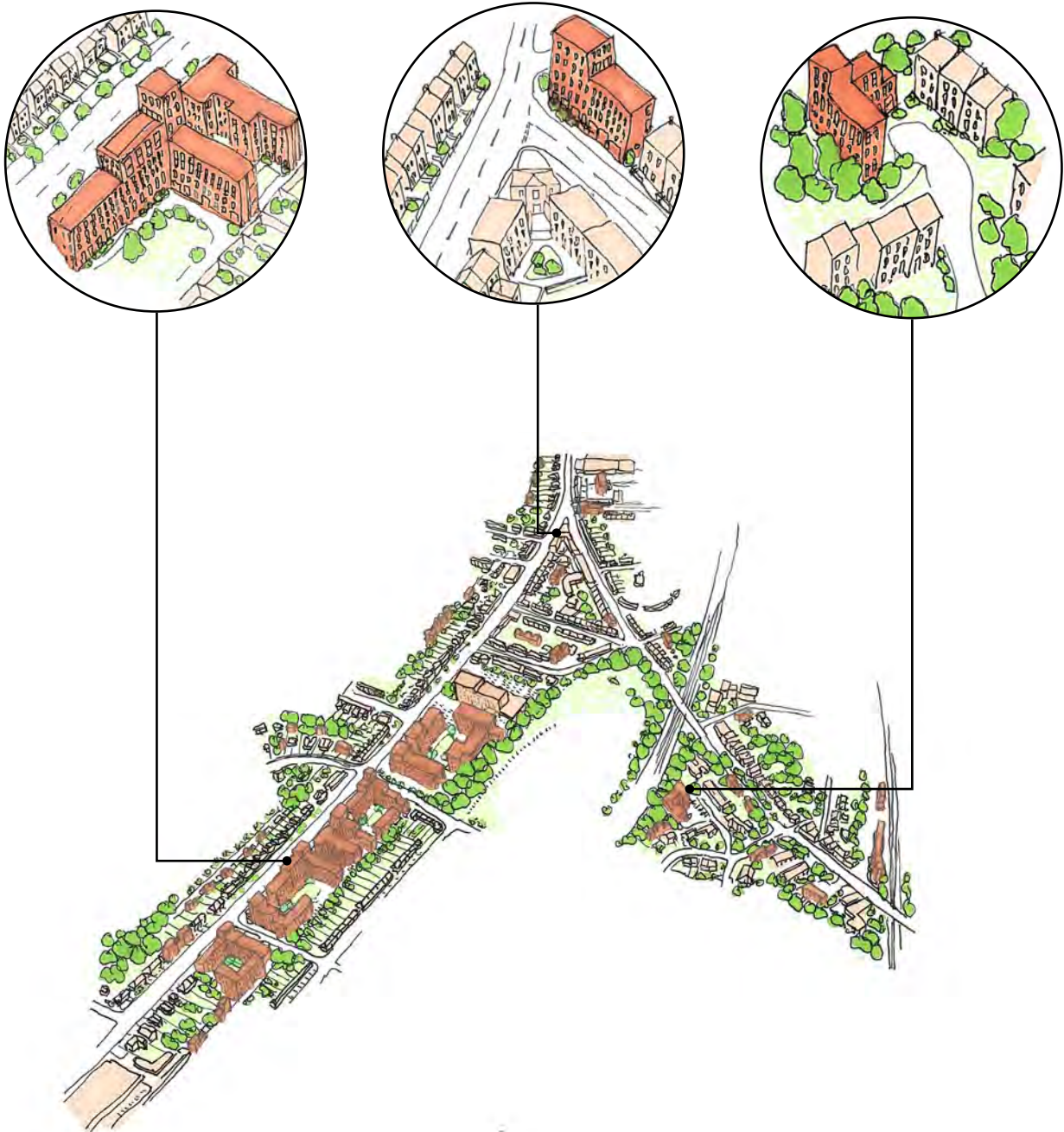
2019 Figure 3.13a



2027 Figure 3.13b



2036 Figure 3.13c



## 3.14 TYPOLOGY DEVELOPMENT POTENTIAL (BRIGHTON ROAD)

### TERRACED HOUSES AND COTTAGES & SEMI-DETACHED HOUSES ALONG BRIGHTON ROAD:

- Where appropriate and safe access via lanes is available, intensification may seek to provide new development within rear gardens (including garages). These should be single storey height with additional accommodation in the roof.
- Where there are back land sites with clearly redundant & un-neighbourly light industrial units and warehouses situated to the rear of existing homes, these may provide opportunities for redevelopment into housing. Mews style houses of up to two (2) storeys are appropriate in these locations and dependent on the setting, there may be potential for additional accommodation within roofs.
- Where there is a consistent ridge line across terraces and pairs of semi-detached houses, the gradual change in height will occur as properties are redeveloped to a greater height.
- Where individual plots are developed into multiple units the Council will seek to minimise the overall impact of parking demand on the adjacent roads by restricting permission to apply for on street permits in controlled parking zones.

### SUBURBAN SHOPPING AREAS:

- Suburban shopping areas should maximise opportunities to create vibrant, Neighbourhood Centres with active frontages.
- The retail provision must be retained or re-provided. Where shops are not part of a unified parade or they are in a parade that is single storey, there may be opportunities for redevelopment of up to 4 storeys tall. These should be of a scale that brings definition to the public realm and responds to the context of any of the older or established Shopping Parades.
- Where existing parades of 2 or more storeys exist, these should be retained or reprovided. Where possible, spaces above shops may be converted into residential units<sup>43</sup>, where it does not compromise the functionality of the Shopping Parade or centre. It may be more beneficial for parades to be redeveloped to a greater height to provide additional accommodation above. This should range between 4-6 storeys depending on the setting.

### UNDERUTILISED LARGER BUILDINGS<sup>44</sup>:

- Large, underutilised sites provide potential for the creation of mixed-use developments. These may include active frontages along Brighton Road, with associated public realm improvements.
- Development should seek

<sup>43</sup> Conversions from retail to residential must meet the requirements of the relevant policies of the Croydon Local Plan.

<sup>44</sup> Where not an allocated site in the Croydon Local Plan 2018 and where development is in line with Policy SP3.2 regarding the retention and redevelopment of land and premises relating to industrial/employment activity.

to significantly intensify the area through the development of flats and increased heights. The height of new development should vary to respond to the context and streetscene. Heights should therefore vary from 3 to 6 storeys. Development facing onto Brighton Road or South Croydon Recreation Ground may seek to be up to 6 storeys tall.

- Prioritised pedestrian spaces should be provided within the development plots that are open to the public and allow for connections to the park.
- The provision of family accommodation close to parks and open space is encouraged.

### MEDIUM RISE BLOCKS WITH ASSOCIATED GROUNDS:

- Larger sites provide infill development opportunities, including redevelopments of garage blocks. Infill development should be of a massing to allow the open character of these sites to be maintained.
- Garage blocks may be redeveloped to the same height of the host blocks, provided there would be no unreasonable impact on access to light on neighbouring properties.
- Where there is a loss of parking/ garage block, the Council may require a parking survey to show that it will not result in a negative impact on parking stress in adjacent roads. If there is deemed to be a negative impact on parking stress then the Council may seek to minimise the overall

impact of parking demand on the adjacent roads by requiring the developer to enter into a legal agreement restricting future occupiers from applying for an on street parking permit

in the Controlled Parking Zone (CPZ), as per Policy DM30a of the Croydon Local Plan, in areas of PTAL 4 and above or in areas of parking stress. If there is evidence of parking

stress and the site is outside a CPZ then the development will be expected to accommodate parking on site.



Figure 3.14a: Brighton Road.

# SHIRLEY

## 3.15 INTENT OF THE SHIRLEY INTENSIFICATION AREA:

3.15.1 Developments in Shirley (as designated in the Croydon Local Plan) should seek to enhance the Local Centre and further establish the neighbourhood characteristics of the area. Redevelopments should seek to provide an increased density in housing through varying development types and an uplift along Wickham Road to enrich the existing amenities, providing lasting growth to the area as a Local and Neighbourhood Centre. The neighbourhood feel along Wickham Road should be encouraged further west, with improvements to the East-West route leading towards Central Croydon and associated infrastructure along Shirley Road allowing land to be unlocked for development and to improve the public realm.



Figure 3.16a: Shirley Road.

## 3.16 AREA APPRAISAL

3.16.1 The area defined for focussed intensification in Shirley is predominantly residential-focus intertwined with Local and Neighbourhood Centre services.

3.16.2 The area along Addiscombe Road is identified by semi-detached homes to the north, with detached homes on larger plots on the southern side of the road, as well as the Shirley Park Golf Clubhouse. The roundabout at Shirley and Addiscombe Roads is bordered by a successful parade of independent shops that provide a useful service to the community at this key intersection. Denser development exists at the northern end of the section of Shirley Road within the Intensification Area with some terraced houses, cottages and compact houses on relatively small plots. At the southern end, Shirley Road rises up and dominates the environment, with semi-detached homes on one side separated from the Trinity School of John Whitgift by dual-carriageway and associated slipways.

3.16.3 The Wickham Road portion of the Intensification Area includes Locally Listed Shirley Methodist Church, a mix of semi-detached



Figure 3.16b: A232 Dual Carriageway.

houses and medium rise blocks and Shirley Parish Hall. Importantly, the existing retail strip on Wickham Road is not included in the Area of Focussed Intensification identified for development. Whilst this portion of retail land separates the defined area, the eastern side of Wickham Road is included which is typified by semi-detached bungalows, leading to small scale retail and industry, along with Shirley Library. The number of local community spaces will be important to the continued success of the area and development should seek to enhance these offers.

3.16.4 The Intensification Area as a whole is severed by the dual carriageway road. Creating better pedestrian and cycle crossings is crucial to providing a people focussed link between the Shirley Road Neighbourhood Centre and Shirley Local Centre. Where possible, and as reliance on private car ownership reduces in line with national trends, there may be future opportunity to reduce the width of the road.

3.16.5 There are 6 bus routes that serve the area and there is the potential for the area to provide an improved connection from the east of the borough, creating a gateway to the Croydon Metropolitan Centre. This provides opportunities to look at ways to encourage a lower reliance on cars from East to West entering Croydon, making the roadway safer for cyclists and pedestrians. The inclusion of a designated cycle lane each way would allow denser development to occur with lesser car dependency. Improvements to the dual carriageway area provides an opportunity to make a place that is distinctively recognisable and identifiable as a focus within Shirley.



Figure 3.16c: Map with boundary of Shirley Intensification Area (As designated in the Croydon Local Plan).

## 3.17 POTENTIAL DEVELOPMENT SCENARIO (SHIRLEY)

3.17.1 The scenario described in the following images is indicative and describes one potential way in which the area may be developed. Proposals within the area will be subject to consideration against the Croydon Local Plan, London Plan and this guidance document.

2019 Figure 3.17a



2027 Figure 3.17b





2036 Figure 3.17c



## 3.18 TYPOLOGY DEVELOPMENT POTENTIAL (SHIRLEY)

### AREAS OF SEMI-DETACHED HOMES:

- Pairs of semi-detached houses may be developed together to provide large developments of flats, maisonettes or terraces. These should provide up to 4 storeys of accommodation, one of which is accommodated in the roof.
- Where possible, proposals may seek to amalgamate 4 or 6 houses (i.e. 2 or 3 pairs of semi-detached houses) in a row to create larger developments which respond to topography. Applicants should refer to the guidance for building across boundaries where this is proposed (Refer to Section 2.15 for guidance).
- Semi-detached houses with large gardens may provide opportunities for rear garden development, particularly where neighbouring properties have similar potential. In these circumstances, the proposed development should be designed to ensure future access can be accommodated from the access route to the first rear garden development.

### AREAS OF DETACHED HOMES ON RELATIVELY LARGE PLOTS:

- Redevelopment of 2 storey detached properties into small blocks of apartments may be acceptable. These developments should typically be 4 storeys in height. There may be some scope for additional accommodation in the roof space.
- Rear gardens may be subdivided to create new

houses of no more than 2 storeys tall.

### AREAS OF LARGE HOMES ON RELATIVELY SMALL PLOTS:

- Development may seek to amalgamate small plots to establish larger development sites. Larger sites may accommodate blocks of flats or townhouses of up to 4 storeys in height where facing the street.
- Only those with the largest gardens may present the opportunity to be subdivided to provide new homes.

### TERRACED HOUSES AND COTTAGES & COMPACT HOUSES ON RELATIVELY SMALL PLOTS:

- Standalone houses may present some opportunity for redevelopment into dwellings of up to 3 – 4 storeys tall, depending on the context and impact on the street scene.
- Where suitable access to the rear of a property exists, there may be some opportunity to provide new development within rear gardens (including garages). These should be single storey height with additional accommodation in the roof.

### SUBURBAN SHOPPING AREAS:

- Suburban shopping areas should maximise opportunities to create vibrant, neighbourhood centres with active frontages.
- The retail provision must be retained or re-provided.
- Where shops are not part of a unified parade or they are in a parade that is single storey, there may be opportunities for redevelopment up to a

height of 3 storeys. These should be of a scale that brings definition to the public realm and responds to the context of any of the older or established shopping parades.

- Where existing parades of 2 or more storeys exist, these should be retained or reprovided. Where possible, spaces above shops may be converted into residential units<sup>45</sup>, where it does not compromise the functionality of the shopping parade or centre. It may be more beneficial for parades to be redeveloped to a greater height to provide additional accommodation above. This should range between 4-6 storeys depending on the setting.
- Back land to the rear of existing shops may present the opportunity for redevelopment into housing. These may be mews style houses of up to 3 storeys, dependent on the setting and resulting impacts on neighbouring amenity and the streetscene.

### INSTITUTIONS WITH ASSOCIATED GROUNDS<sup>46</sup>:

- Larger sites provide opportunities to revise infrastructure provisions to create new mixed-use development potential and increase density.
- Where existing spaces allow, there may be opportunity for infill development.

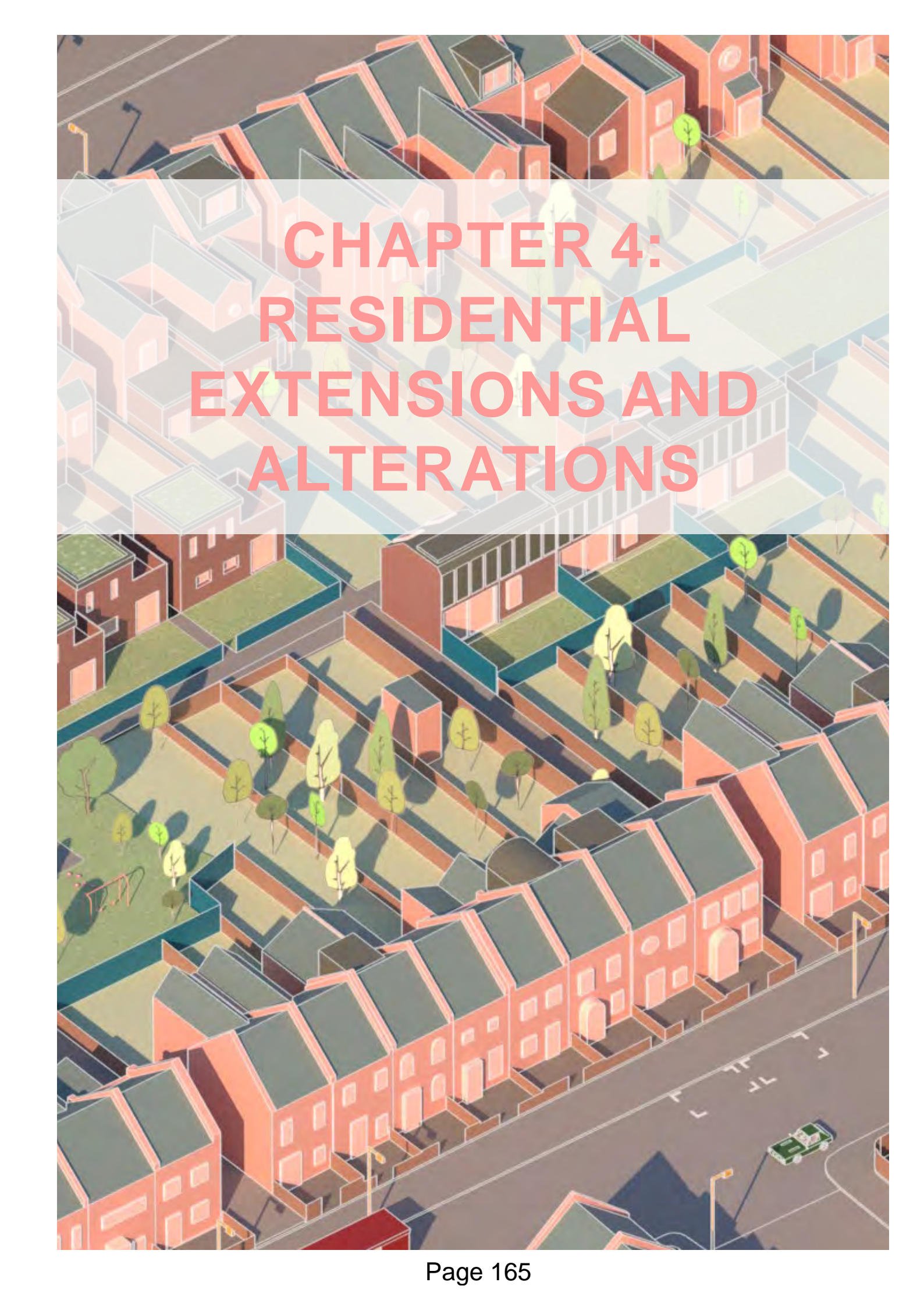
<sup>45</sup> Conversions from retail to residential must meet the requirements of the relevant policies of the Croydon Local Plan 2018.

<sup>46</sup> Where in accordance with Policy SP5 Community Facilities of the Croydon Local Plan 2018.



Figure 3.18a: Wickham Road.



An aerial, isometric illustration of a residential neighborhood. The scene is dominated by red brick buildings with dark grey roofs. The buildings are arranged in a grid-like pattern, with narrow streets and small courtyards. In the center, there are several green spaces with trees and a playground. A road with a white car is visible in the bottom right corner. The overall style is clean and modern, with a focus on architectural details and urban planning.

# CHAPTER 4: RESIDENTIAL EXTENSIONS AND ALTERATIONS



Figure 4.1a: A semi-detached home with set-back side extensions. (Photo: Ruth Ward)

# INTRODUCTION

## 4.1 EXTENSIONS & ALTERATIONS

4.1.1 Extensions and alterations enable existing housing stock to be improved and evolve for the occupiers. Innovative and creative design solutions for extensions and alterations are encouraged and proposals must demonstrate the design merits of the development. In some circumstances, extensions and alterations may not require planning permission. Where a proposal is deemed to be Permitted Development, applicants should refer to Section 4.6 for further guidance.

4.1.2 Extensions and alterations can significantly change the appearance of a property and, where poorly designed, this can have a detrimental impact on the character and amenity of an area. They can also have significant impacts on neighbouring properties. Any extension should be designed and developed appropriately to ensure that it does not cause a harmful loss of light, visual intrusion or privacy. The scale and appearance of an extension or alteration should also consider the impact on the neighbourhood, and whether it would result in the loss of soft vegetation that contributes significantly to the appearance of the area.



Figure 4.1b: An extension that successfully uses contemporary details and an un-symmetrical roof pitch to add interest to this design by Trehwela Williams. (Photo: Simone Bossi)

# DESIGN PRINCIPLES: EXTENSIONS & ALTERATIONS

## 4.2 RESPOND TO CHARACTER

4.2.1 Developments should consider the character of the area and dwelling to which an extension or alteration is proposed. The built character of an area includes, but is not limited to the size, shape and positioning of buildings, the associated landscaping, materials and details. Extensions and alterations should seek to respond to the character of a dwelling and the existing appearance of the streets. Respond does not mean replicate and the Council will encourage innovative designs that work with the existing character of a building and place. Any proposals which are considered to have a detrimental impact on character will generally be unacceptable.

4.2.2 For further information on how to assess the character of a building or place, applicants should refer to the documents below:

- Detailed information on the characteristics of each area of Croydon is available in the Borough Character Appraisal<sup>47</sup>.
- Detailed information on the characteristic of the predominant housing types within Croydon is available in the Borough Character Typology study<sup>48</sup>.

4.2.3 Where considering proposals that may impact on heritage assets, such as in Conservation Areas or to Listed Buildings, please refer to Heritage guidance in Section 1.4.

## 4.3 SCALE

4.3.1 Extensions and alterations should generally be of a scale that is subservient to the existing dwelling in accordance with Policy DM10.1 of the Croydon Local Plan. Subservience is required to prevent terracing between and to the rear of existing properties, or to avoid uncharacteristically large additions to the front of a property that would detract from the appearance of the street. Through following the guidance in this chapter (Refer to Sections 4.11 – 4.22) subservience will usually be achieved. However, this should not however stifle or discourage high quality design in terms of form, fenestration, materials and detailing, as set out in Approaches to Design (Refer to Section 4.5).

## 4.4 SUSTAINABILITY

4.4.1 The environmental impacts and long term sustainability of extensions and alterations is a key consideration in the design of an extension and/or alteration. Proposals for extensions and alterations should seek to integrate materials, insulation, heating, lighting and ventilation systems which minimise energy consumption and improve the environmental performance of the building. This should be considered from the outset of developing a proposal.

## 4.5 APPROACH TO DESIGN

4.5.1 Extensions and alterations to an existing dwelling should respond to character (Refer to Section 4.2) and be subservient in scale (Refer to Section 4.3), whilst developing a high quality approach to the design in terms of the form, fenestration, materials and detailing. The following two distinct approaches, **Supplementary** or **Innovative**, provide broad design direction to the development of a proposal, however there may be other successful approaches and those outlined here should not stifle creativity in achieving high quality design.

<sup>47</sup> Available in the Urban Design, Local Character and Heritage section of the local plan evidence at: <https://www.croydon.gov.uk/planningandregeneration/framework>

<sup>48</sup> Available in the Urban Design, Local Character and Heritage section of the local plan evidence at: <https://www.croydon.gov.uk/planningandregeneration/framework>.



## SUPPLEMENTARY

4.5.2 This is the approach that most proposed extensions and alterations are likely to take as it can be easiest to achieve successfully and affordably. A supplementary approach will typically have a form that does not distract from the appearance of the existing house, but may still introduce contemporary elements, such as increased proportions of glazing or new materials. The materials and details should complement the existing house, but do not necessarily need to replicate them and should allow the existing house to maintain its prominence.



Figure 4.5a: A supplementary side extension designed by Selencky Parsons. The form clearly relates to the existing house, but successfully introduces larger windows and combines new materials with brickwork to complement the existing house. (Photo: Andy Matthews)

## INNOVATIVE

4.5.3 This approach may be suitable for challenging sites that require a particular design response or where the context provides opportunity to depart from traditional domestic aesthetics. This might be through the use of contemporary materials, unique forms and/or new construction methods. An innovative approach should provide the highest quality design and allow an extension and alteration to be distinguished from, whilst enhancing, the existing dwelling. An innovative approach will require more investment in the design and construction of a proposal due to its bespoke nature.



Figure 4.5b: This innovative extension designed by Alison Brooks Architects enhances the existing dwelling through its contrasting form, use of the highest quality materials and contemporary detailing. (Photo: Paul Riddle)



Figure 4.5c: A series of extensions designed by fourth\_space that appear supplementary to the original house by clearly responding to its existing form and materials.

# PLANNING CONSIDERATIONS FOR RESIDENTIAL EXTENSIONS AND ALTERATIONS

## 4.6 PERMITTED DEVELOPMENT

4.6.1 Many proposals for extensions and alterations to a home may be possible under Permitted Development (PD) rights. PD provides rules that allow people to alter existing buildings, and in some circumstances create new buildings, without needing to apply for planning permission. However, the scope of an extension and alteration under PD is limited and technical guidance is available on the Planning Portal<sup>49</sup>.

4.6.2 This guide provides a level of design quality for proposals and therefore those seeking to develop under PD may also find the guidance useful to ensure that all proposals for extensions and alterations contribute positively to the existing dwelling and the character of an area, with limited impact on neighbouring amenity.

4.6.3 Where a PD alteration is pursued, homeowners can obtain a Lawful Development Certificate (LDC) from the Council to demonstrate their project is legal under PD rights. PD rights do not generally apply to flats and are more limited for Listed Buildings and conservation areas. In some areas, an Article 4 Direction has also been put in place to manage change in an area by further restricting PD rights.

## 4.7 MINOR ALTERATIONS

4.7.1 Applicants are advised to contact Croydon's Planning Department<sup>50</sup> for minor alterations to determine whether planning permission or Listed Building consent is required, or if other relevant legislation or development restrictions are applicable.

4.7.2 All proposals, including those that do not require planning permission and minor alterations should utilise the Detailed Design for Extensions and Alterations sections 4.23 - 4.27. Further advice should be sought from Council's Pre-application Service<sup>51</sup>.

## 4.8 SHARED PROJECTS

4.8.1 In some circumstances, a joint planning application between neighbours can be beneficial. Where both parties seek to create an extension at the same time, this may provide an opportunity to achieve larger proposals than would normally be acceptable due to the impacts on neighbouring properties. A joint application will be subject to a legal agreement that requires both extensions to be constructed and completed at the same time. Applicants should consider this prior to a submission.

## 4.9 HOME BUSINESSES

4.9.1 The ability to work remotely is increasingly common, meaning many people use their home as the base for their business. Provided the building remains as a dwelling and the use as a business does not cause disruption to neighbours, planning permission for the change of use may not be required. Where this is the case, planning permission may still be required for the creation of additional space for a home business but this will generally be considered the same as a residential use and should follow the guidance contained within this document. Where a plan to use a home business would result in several employees using the premises and/or it could disturb neighbours, planning permission for change of use may be required. For further advice please contact the Local Planning Authority as part of the Councils formal pre-application service.

## 4.10 SUBDIVISION

4.10.1 Where proposals seek to subdivide a dwelling to create multiple dwellings, such as the conversion of a house into flats or the subdivision of a rear garden to create a separate dwelling, applicants should refer to the relevant guidance on site layout & servicing and landscaping & outdoor amenity space in the Suburban Residential Development section of this guide and Policy DM10.1 of the Croydon Local Plan.

<sup>50</sup> Applicants should utilise Council's duty planning officer service. More information is available via: <https://www.croydon.gov.uk/planningandregeneration/duty-planning-officer-service>.

<sup>51</sup> For more information, refer to: <https://www.croydon.gov.uk/planningandregeneration/pre-application-meeting-service>.

<sup>49</sup> <https://www.planningportal.co.uk/>.

# SINGLE STOREY EXTENSIONS

## 4.11 SINGLE STOREY REAR EXTENSIONS

4.11.1 Single storey rear extensions are not normally visible from the streetscene, so are usually less visually intrusive than side or two-storey rear extensions. However, these extensions can still have an impact on neighbouring amenity including access to sunlight and daylight and outlook. To resolve these potential issues, single storey rear extensions should be designed to ensure:

- That in a terraced or semi-detached property it is no deeper than 3.5m<sup>52</sup> from the rear elevation of the original dwelling.
- That in a detached dwelling, it is no deeper than 45° (in plan) as measured from the centre of the window of the nearest habitable room in the neighbouring property or 3.5m from the rear elevation of the original dwelling, whichever is greater. In semi-detached dwellings, where there is sufficient separation from neighbouring boundaries the 45° rule can be applied to achieve a deeper footprint than 3.5m (Refer to Figure 4.11b).

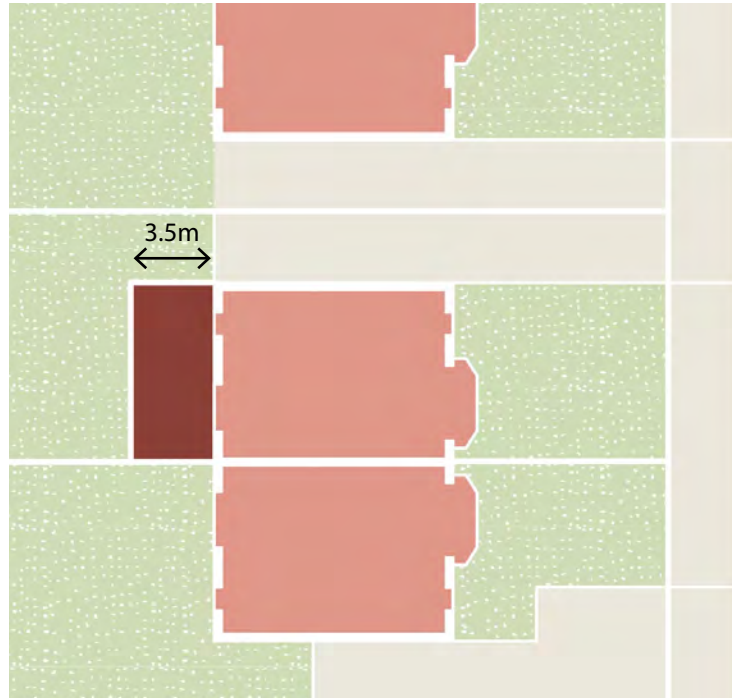


Figure 4.11a: An extension to a terraced house that is no more than 3.5m deep.



Figure 4.11b: An extension to a semi-detached house that is set away from neighbouring boundary, allowing for a deeper extension, up to a maximum of 45° as measured from the centre of the window of the nearest habitable room in the neighbouring properties.

<sup>52</sup> Permitted development is limited to 3m in all dwellings except detached properties.

- Where there are existing outriggers or extensions, it may be possible to create a dog-legged extension as per Figure 4.11c where the resulting projection of each part of the extension is no more than 3.5m from the respective rear walls.
- Where an existing outrigger or extension is deeper than 3.5m, in some circumstances it may be possible for a new extension to extend up to the depth of the existing outrigger or extension provided there is a compelling design that limits impact on neighbouring amenity.
- The height of a single storey rear extension at its highest point should generally not exceed 4m. The height of a side wall of a single storey that directly abuts a neighbouring boundary will generally need to be less than 4m to minimise impact on neighbouring amenity. Particular consideration needs to be given to the orientation and topography of the site, where this may exacerbate impacts on neighbouring amenity. Refer to Figure 4.11d.
- The detailed design, including specification of materials, windows and doors, should be informed by the guidance on Detailed Design (Refer to Sections 4.23 - 4.27 for guidance).

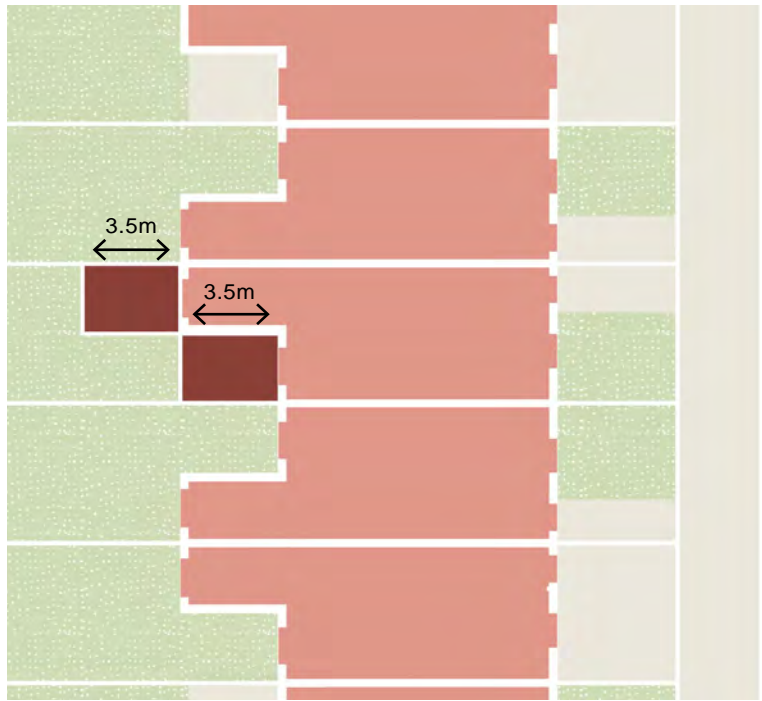


Figure 4.11c: A dog-legged extension where there is an existing outrigger.



Figure 4.11d: Maximum height and relationship with neighbouring boundary.

Height reduced depending on potential impacts to neighbouring amenity

No greater than 4m

## 4.12 SINGLE STOREY SIDE EXTENSIONS

4.12.1 Side extensions should consider the impact on the appearance of the street. Care is also needed when considering the relationship between any proposed extension and the boundary with neighbouring properties as the separation between properties can provide access routes to the rear of the property and in some locations are part of the character of the area. Depending on the orientation of the neighbouring property, side extensions also have the potential to impact their amenity. To ensure these potential issues are resolved, single storey side extensions should be designed in accordance with the guidance below.

- They may be as deep as the existing house and extend beyond the rear elevation to the distances and in line with the design guidance prescribed in Section 4.11 Single Storey Rear Extensions.
- The height of a wall of an extension that directly abuts a neighbouring boundary should be designed to minimise impact on neighbouring amenity.
- To prevent overlooking of neighbouring properties, windows and doors should normally be placed in the front and rear walls of the extension. If windows are proposed on side walls where they would create issues of overlooking, they should be at high level, non-opening and fitted with obscured glass. Any windows on side elevations should not prejudice the development potential of adjoining land.
- Extensions that are irregular to an existing pattern of buildings along a street will only be acceptable where it can be



Figure 4.12a: A single storey side extension that extends beyond the rear elevation of a property.

Depth beyond rear elevation limited according to guidance on rear extensions

demonstrated they would enhance the appearance of the street and character of the area. In such circumstances the design approach should not upset the balance and proportions of the existing dwelling.

- Where an extension seeks to build beyond the existing front elevation, they should also refer to the guidance on front extensions (Refer to Section 4.14). If they do extend beyond the front building line, applicants are encouraged to combine this with a new or existing porch where applicable.
- The detailed design, including specification of materials, windows and doors, should be informed by the guidance on Detailed Design (Refer to Sections 4.23 - 4.27 for guidance).



Figure 4.12b: A poorly designed single storey side extension that fails to respond to the original dwelling. It has an awkward combination of roof forms and the appearance is further exacerbated by the porch extension, which hasn't been combined with the side extension.

## 4.13 SINGLE STOREY WRAP-AROUND EXTENSIONS

4.13.1 Wrap-around extensions which seek to extend to the side as well as to the front or rear of an existing house must have regard to impacts on neighbouring amenity and the appearance from the street. Wrap-around extensions should refer to the relevant combination of guidance for side and rear or front extensions.

## 4.14 SINGLE STOREY FRONT EXTENSIONS AND PORCHES

4.14.1 Front extensions can change the character of the original building and where poorly designed have a negative impact on the appearance of the street; due to their visibility these kind of extensions are most likely to have an impact on the wider streetscene. It is therefore important to invest a high level of design quality in such proposals following the guidance below:

- Extensions that are irregular to an existing pattern of development will only be acceptable where it can be demonstrated they would enhance the appearance of the street and character of the area. This is likely to be challenging in streets with a consistent pattern of development.
- Front extensions must be designed to respond to and enhance the character of the existing dwelling.
- They should generally be no deeper than 1.5m and avoid being full width; overly-wide or deep extensions which



Figure 4.14a: Example of a good side extension wrapping around to incorporate a well-designed porch, successfully integrating with the existing dwelling.

would appear to dominate the appearance of the existing dwelling and fail to enhance character will not be supported.

- The detailed design, including specification of materials, windows and doors, should be informed by the guidance on Detailed Design (Refer to Sections 4.23-4.27 for guidance).

4.14.2 Porches can be added to a house to provide a threshold space between the exterior and interior, whilst adding emphasis to the entrance:

- The scale and design of new porches should respond to the existing dwelling. Care should be taken to preserve the appearance of existing features, such as bay windows and avoid porches that would impact these. The roof design of a porch should be carefully considered to ensure its appropriateness to the existing house.
- Existing porches that are open to the street and are an original



Figure 4.14b: A poor example of two porches that have been built up to and over original bay windows. The design fails to respond to the historic pattern of development and materials are low quality.

feature that form part of a local pattern of development should generally not be enclosed.

- The detailed design, including specification of materials, windows and doors, should be informed by the guidance on Detailed Design (Refer to Sections 4.23 - 4.27 for guidance).

## 4.15 ROOF DESIGN FOR ALL SINGLE STOREY EXTENSIONS

4.15.1 The shape or form of the roof can have a significant impact on the appearance of an extension, but can also add interest to a design. The design of a roof needs to consider the relationship with the existing house and surrounding context. It is therefore important to consider their appearance and performance as part of the design following the guidance below:

- The design of roofs for all single-storey extensions must not create unreasonable negative impacts on neighbouring amenity. Roof designs that result in excessive visual intrusion and/or the blocking of natural light to neighbouring properties must be avoided.
- Where a pitched roof is proposed, care needs to be taken with how this may relate to windows on the first floor, where the roof meets the outer walls of the existing house. (Refer to Figure 4.15a).
- Where a flat roof is proposed, this should not normally be proposed to be used as a terrace or balcony. This is to protect the privacy of neighbours. However, in some cases it may be possible if it is demonstrated that neighbour's amenity in both directions is not impacted. The introduction of screening devices to help prevent overlooking from terraces or balconies are generally not considered acceptable as these can be detrimental to suburban character.
- Consideration should be given to how rainwater goods will be accommodated into the design



Figure 4.15a: An example of a roof design to a single storey extension by Nimtim Architects that has been designed to ensure it doesn't overlap with the windows above. (Photo: Anna + Tam)

of the roof (Refer to Section 4.24 for guidance).

- Applicants are advised to consider how the roof of an extension can be used to enhance the environmental performance of their home. This may include providing solar panels or a green roof. Any such proposals are encouraged by the Council but should be clearly shown on drawings submitted with the application. The acceptability of such proposals will however have regards to any potential negative impacts on the visual amenity of neighbouring properties or the appearance of the street.
- The detailed design, including specification of materials and rooflights should be informed by the guidance on Detailed Design (Refer to Section 4.23 - 4.27 for guidance).



Figure 4.15b: A side and front extension with a series of different roof forms results in a poorly considered composition that has a negative impact on the streetscene.





Figure 4.16a: Example of a two-storey rear extension of a terraced house designed by Gundry+Ducker Arch. that infills between existing extensions and outriggers, refer to Section 4.16 for guidance. This scheme also features a well-designed parapet detail to the roof (refer to Section 4.15) and concealed rainwater goods (refer to Section 2.24) giving a clean appearance. (Photo: Andrew Meredith)

# TWO-STOREY EXTENSIONS

## 4.16 TWO-STOREY REAR EXTENSIONS

4.16.1 Two-storey rear extensions are often desirable to create more space within a home, however they need to be carefully designed to avoid negatively impacting neighbouring properties. Proposals for two-storey rear extensions should consider the surrounding context and ensure:

- For all types of housing, they are positioned so that they do not result in unreasonable loss of daylight to habitable rooms in neighbouring properties or result in an unreasonable level of overlooking.
- For terraced houses, they are only proposed where they would be infilling between two existing two-storey extensions or outriggers (Refer to Figure 4.16b) and therefore wouldn't impact on neighbouring amenity. Where this is the case, the extension should be of a height and depth no greater than the existing extensions or outriggers.
- For semi-detached properties, they are located on one side of the rear of the property that does not abut the adjoined property (Refer to Figure 4.16c); or they adjoin the neighbour where it already contains a two-storey rear extension (Refer to Figure 4.16d). They should generally be no wider than half the width of the existing house and no deeper than 45° (in plan) as measured from the nearest habitable room window on neighbouring properties to both sides of the dwelling and should not exceed the eaves and roof ridge line of the existing house.

- For both terraced and semi-detached properties, there may be greater potential to create two-storey rear extensions where a joint scheme comes forward, subject to a legal agreement (Refer to Section 4.8 for guidance).
- For detached properties, they should generally be of a depth no greater than 45° as measured from the nearest habitable room window on neighbouring properties to both sides of the dwelling. They should not normally exceed the eaves and roof ridge line of the existing house.
- The specification of materials, windows and doors is in accordance with the guidance on Detailed Design (Refer to Section 4.23 - 4.27 for guidance).

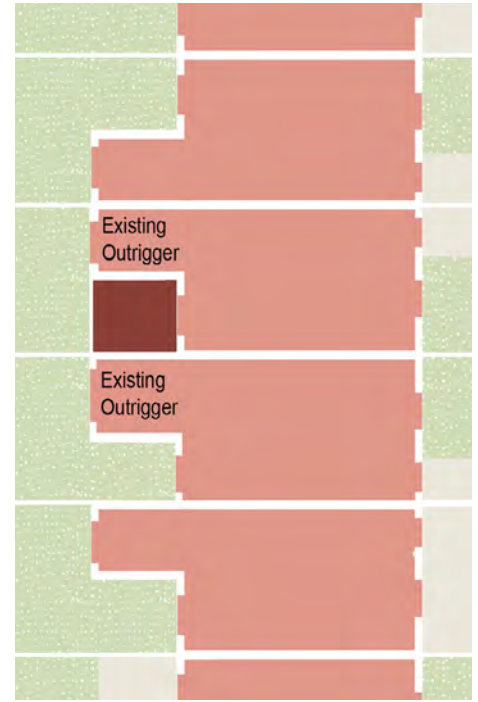


Figure 4.16b: Example of where a two-storey rear extension may be acceptable where it would be infilling between existing extensions / outriggers and would not impact on neighbouring amenity.

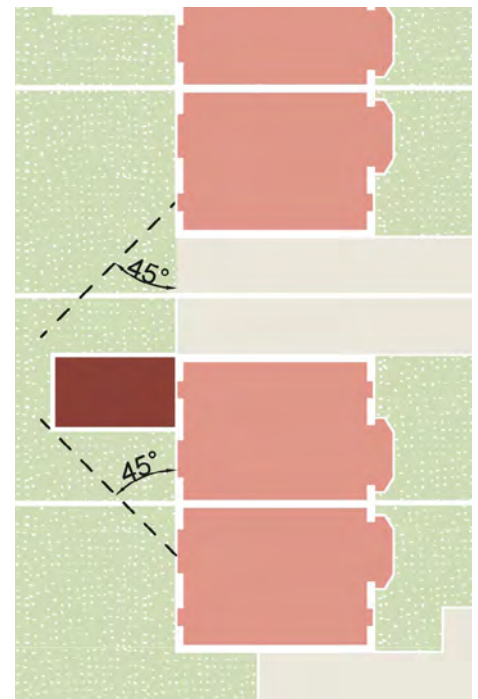


Figure 4.16c: A two-storey extension to a semi-detached house set away from the directly adjoining neighbour.



Figure 4.16d: A two-storey extension proposed to a semi-detached house where a neighbour already has a two-storey extension.



Figure 4.16e: A two-storey extension to a semi-detached house set away from the directly adjoining neighbour.

## 4.17 TWO-STOREY SIDE EXTENSIONS

4.17.1 Two-storey side extensions are appropriate where space is sufficient and the impacts on the townscape and neighbouring properties are considered. Two-storey side extensions must consider the surrounding context and ensure:

- They are designed so as not to create an unreasonable impact on access to daylight and overlooking in habitable rooms on neighbouring properties.
- The existing rhythm of the street, including for example characteristic gaps between properties, the symmetry of pairs of semi-detached homes or groups of terraced houses, would not be unreasonably interrupted.
- They do not result in an overly wide or poorly proportioned elevation facing the street. This can usually be avoided by setting the extension back from the existing front elevation; this should be at least 1m at the first floor, while a ground floor setback of approximately 1 brick (215mm) could be provided. In some special circumstances a reduced setback may be allowable and would need to be justified in an application and considered on a case by case basis.
- They do not exceed the eaves and roof ridge line of the existing house.
- The specification of materials, windows and doors is in accordance with the guidance on Detailed Design (Refer to Section 4.23 - 4.27 for guidance).



Figure 4.17a: A good example of a setback at first floor on a two-storey side extension.



Figure 4.17b: A low quality two-storey side extension which is overly dominant, upsetting the balance of this pair of semi-detached homes. The brick neither matches nor distinguishes from the existing and the junction at the eaves is poorly detailed.



Figure 4.17c: Example of a subservient two-storey side extension designed by Selencky Parsons that introduces contemporary elements, such as the windows and their surrounds, to help distinguish the new from the existing. (Photo: Andy Matthews)

## 4.18 TWO-STOREY FRONT EXTENSIONS

4.18.1 Two-storey front extensions are likely to have a significant impact on the appearance from the street and will be determined on a case-by-case basis.

## 4.19 TWO-STOREY WRAP-AROUND EXTENSIONS

4.19.1 Two-storey wrap around extensions can introduce a large additional volume and therefore need to be carefully designed to respond to the character of the existing dwelling and neighbouring properties.

4.19.2 Two-storey wrap-around extensions which cover the side and rear or side and front of a dwelling will generally be determined on a case-by-case basis and where they follow a combination of guidance for the applicable extension (Refer to Sections 4.16, 4.17 and 4.18 for guidance).

# CORNER PLOTS

## 4.20 EXTENSION TO HOUSES ON CORNER PLOTS

4.20.1 Corner plots provide opportunities to create large extensions that face onto the return road and in some cases can create a landmark building feature. Their location makes them highly visible from two streets and can provide an opportunity to improve the appearance of an area. Houses on corner plots may have capacity for two-storey extensions that extend to the side or rear. They should be designed to create a positive relationship with the existing dwelling, neighbouring properties and street scene and ensure:

- Where extensions are proposed that would project beyond the rear of the existing dwelling, they follow the guidance on rear extensions (Refer to Sections 4.11 or 4.16 for guidance). Where separation with the neighbours and orientation allows, there may be scope for a deeper extension.
- Where extensions are proposed that would project beyond the side wall of the existing dwelling they follow the guidance on side extensions (Refer to Sections 4.12 or 4.17 for guidance).
- Any projection forward of the building line on the return street is carefully designed as this will be highly visible. This may be resolved through the massing (such as stepping), fenestration or material treatment of the proposal. Views along the return street to the proposed building should be considered.
- The relationship between the roof of the existing property and an extension on a corner is carefully considered. Extensions that result in overbearing end walls, including uncharacteristic gables, will generally not be acceptable.
- The specification of materials, windows and doors is in accordance with the guidance on Detailed Design (Refer to Sections 4.23 - 4.27 for guidance).

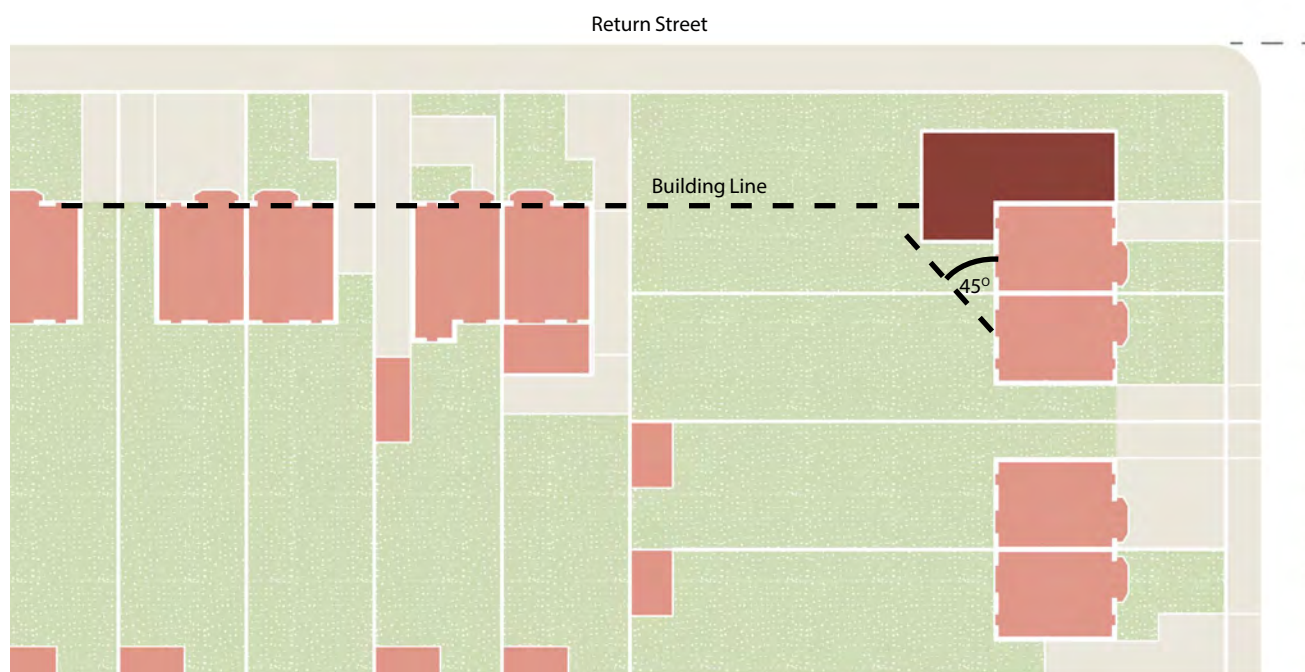


Figure 4.20a: A plan of an acceptable corner plot extension.

# ROOFS

## 4.21 EXTENSIONS & ALTERATIONS TO ROOFS

4.21.1 The use of loft space to provide additional accommodation can often provide more space for relatively little cost, using natural light through the use of skylights. Roof extensions, such as dormer windows or box extensions which project out from the roof slope, should be used where there is a need to enlarge the useable floor space within a loft or where they are more characteristic of the area. Extensions and alterations to roofs should follow the guidance below:

- Ideally be located on the rear elevation of a dwelling to minimise impact on the street.
- May be full-width for mid-terrace houses, but should be set in from the edge of a hipped roof or gable end on end of terrace houses (refer to Figures 4.21b and 4.21g).
- May be no more than two-thirds the width of the existing roof on a semi-detached or detached house, and should be set in from the edge of a hipped roof or gable end (refer to Figures 4.21a and 4.21g).
- Should be no higher than the existing ridge-line.
- Should not wrap around two-sides of a hipped roof unless in special circumstances where it can be justified; this will be judged on a case by case basis.
- Should include generously sized windows that are generally best if positioned to relate to the existing doors and windows on the floor below. Large blank facades on dormers can have an overbearing appearance and will not generally be acceptable.
- If proposing a hip to gable roof extension, should not interrupt

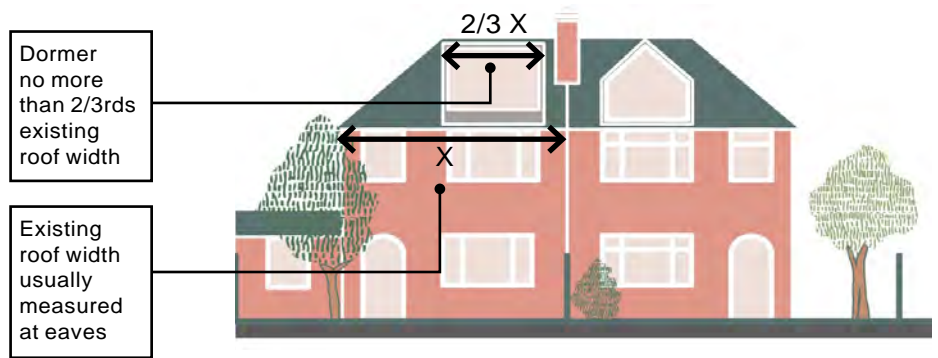


Figure 4.21a: Dormers on a semi-detached or detached house, no more than two thirds the width of the existing roof, and set in from the edge of a hipped roof (or a gable end).

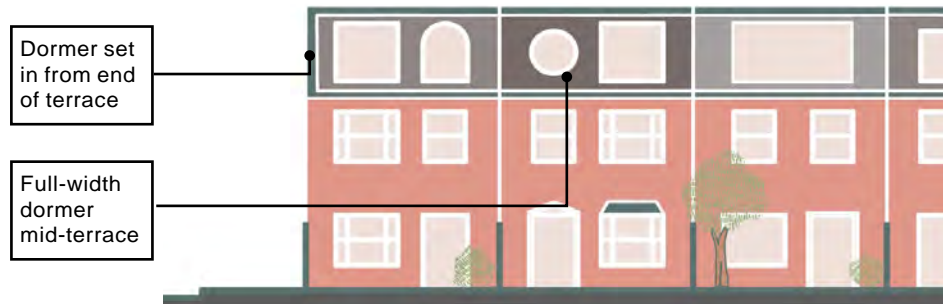


Figure 4.21b: Dormers on a terraced houses that are full-width for mid-terrace houses, but set in from the edge of a gable end (or hipped roof) on the end of terrace house.

the pattern of roof forms visible from the street.

- If proposing a side roof extensions, be no more than two thirds the width of the existing roof and should not interrupt the appearance of the roof when viewed from the street (refer to Figure 4.21e). Habitable room windows in the side elevation facing a neighbouring property would not normally be acceptable if it results in overlooking to habitable rooms or the first 10m of the rear garden of a neighbouring property.
- Choose materials, windows and doors in accordance with the guidance on Detailed Design (Refer to Sections 4.23-4.27 for guidance). This is important for roof extensions due to their visibility, the need to avoid creating an overbearing appearance and the potential to add design interest through materials and detailed design.

4.21.2 It will generally not be acceptable to create dormers on the front of a property. They will only be possible in exceptional circumstances which includes the Areas of Focussed Intensification (Refer to relevant guidance in Chapter 3) or other locations where they would not negatively impact the appearance of the street and not disrupt the rhythm of development along a street. Where this may be possible, they should not be full width or large box dormer, and should generally be setback from the eaves line by a minimum of 0.3m. They should be positioned to be part of the composition of the front elevation, relating to the shape, size, position, and design of the existing doors and windows on the lower floors including space between windows and offsets from side walls. Rooflights may be less disruptive to the street scene and should be considered for front elevations.



Figure 4.21c: A good example of a box dormer on the rear of a terrace house successfully designed by Selencky Parsons to integrate into the existing dwelling; the dormer replicates existing roof tiles, conceals rainwater pipes and aligns the glazing with the windows below. The dormer provides a generous amount of glazing, avoiding an overbearing appearance and benefiting the internal spaces.



Figure 4.21e: Example of where a side roof extension to a house has not been setback from the original roof. In this situation it has compromised the symmetrical form of the original semi-detached houses and therefore negatively impacts the appearance of street.



Figure 4.21f: Example of an inappropriate addition of a front dormer to a mid-terrace house. This addition lacks design merit and breaks the uniformity of the roofs that contributes to the positive characteristics of the street.



Figure 4.21d: The addition of 3 dormers by Threefold Architects that have been sympathetically designed to the existing building and respond to the positioning of the windows below.



Figure 4.21g: Example of where a highly visible roof extension dominates the original building and negatively impacts the appearance of the street. This could have been avoided had the rear box extension been set in from the gable end of the roof to allow the gable and the rear extension to read as two separate elements.

# ADDITIONAL STOREYS

## 4.22 EXTENDING UPWARDS

4.22.1 Where appropriate, an additional storey added across all or any part of a dwelling can be effective for increasing internal floor area, particularly for dwellings with flat roofs. Proposals for additional storeys should ensure:

- They are generally limited to 1 additional storey, except where in exceptional circumstances, such as on larger flat roofs.
- They are generally only applied to detached houses, blocks of flats or on corner plot for any type of house with adequate separation from the boundary of their plot.
- They do not result in

unreasonable loss of light and direct overlooking to habitable rooms or the first 10m of the rear garden in neighbouring properties.

- They are designed to respond to the existing building. In some circumstances, an approach that continues the form, proportions, materials and details of the floor below may be appropriate. This needs to be approached with care to ensure it does not result in an overbearing or poorly proportioned elevations, and presents a risk materials do not quite match and therefore appear to clash. Where this would be the case a setback may be appropriate taking a supplementary or innovative

design approach (Refer to Section 4.5).

- The specification of materials, windows and doors is in accordance with the guidance on Detailed Design (Refer to Sections 4.23 - 4.27 for guidance).

4.22.2 Where additional storeys would result in the creation of new residential units, they should refer to the guidance provided in Chapter 2 with regards to Site Layout & Servicing and Landscaping & Provision of Outdoor Amenity Space.



Figure 4.22a: An example of additional storeys being added to an existing building to provide new homes.



# DETAILED DESIGN FOR RESIDENTIAL EXTENSIONS & ALTERATIONS

## 4.23 DETAILS

4.23.1 The detail incorporated into the design of a proposal will have a significant impact on the finished appearance of an extension or alteration. There are many aspects which should be considered when developing proposals, such as choice of materials, windows & doors, architectural detailing and ancillary items such as flues and rainwater goods.

## 4.24 RAINWATER GOODS & OTHER ANCILLARY ITEMS

4.24.1 Rainwater goods, such as downpipes, and other ancillary items, such as flues and soil vent pipes, can add clutter to the appearance of a dwelling. The impact on the appearance of a proposal should be considered in the early design stages and should ensure:

- The positioning of rainwater goods, flues, vents and other pipes, are in a discreet location and the number of downpipes is limited to avoid cluttered elevations.
- Pipework does not overhang the boundary of neighbouring properties<sup>53</sup>. For flat roofs, the introduction of a parapet is often a successful way to contain rainwater collection within the curtilage of the property. Where the roof slopes towards a boundary, proposals should have a wall setback from the boundary to allow for eaves and gutter overhang. A sloped roof should not generally be combined with a parapet (Refer to Figure 4.24c).
- Where for a single storey side extension, consideration is given to future development of a first floor extension. A single storey side extension up to the boundary could limit the design at first floor if eaves and guttering were to extend over the boundary.
- Meter boxes are placed in a discreet location, generally away from the main entrance or where they are not prominent on the front elevation or subterranean where possible.

<sup>53</sup> Information about Party Walls and the Party Wall etc. Act 1996 for boundaries of land belonging to two (or more) different owners is available at: [https://www.planningportal.co.uk/info/200187/your\\_responsibilities/40/other\\_permissions\\_you\\_may\\_require/16](https://www.planningportal.co.uk/info/200187/your_responsibilities/40/other_permissions_you_may_require/16)

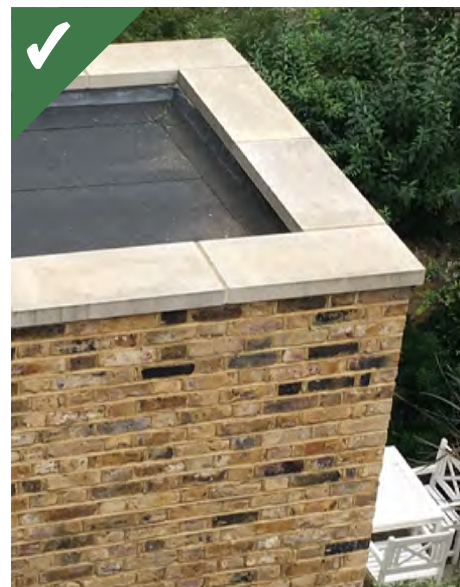


Figure 4.24a: A parapet can be used on a flat roof to remove the need for gutters, creating a less cluttered appearance.

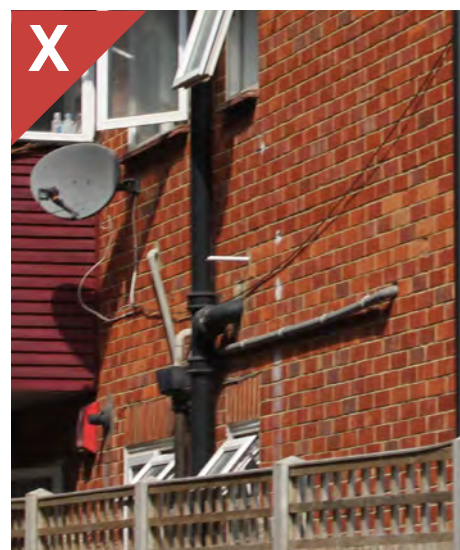


Figure 4.24b: Poorly considered pipework on a side extension, visible from the street.



Figure 4.24c: The combination of a pitched roof with a parapet results in an unattractive appearance.

## 4.25 WINDOWS AND DOORS

4.25.1 Windows and doors should be designed to avoid poorly proportioned, positioned and detailed openings. The relationship between a proposal and existing openings should also be carefully considered. Designs should ensure:

- Where an extension or alteration meets the existing dwelling, they should generally be at least 215mm (1 brick width) clear of any opening on the existing dwelling.
- The positioning and proportions of windows and doors should avoid an elevation that appears imbalanced or that result in large blank facades that would appear overbearing.
- Consideration is given to whether windows or doors as part of an extension or alteration should be:
  - recessed, semi-recessed or flush with the external envelope;
  - in a symmetrical or asymmetrical composition; or
  - match the proportions of windows in the existing house.
- Where the original doors and windows are characteristic features of the existing dwelling or the area, such as bay windows, they are retained.
- Decorative features to door and window surrounds are retained where possible, particularly where they contribute to the character of a building or area.
- The replacement of an unsympathetic door or window is with one of a design that is characteristic of the original dwelling.
- The choice of material of new windows and door frames is consistent. Where wooden frames are already used, this should be continued unless



Figure 4.25a: A wall with different depths of window and door reveals. Deeper reveals add emphasis and solidity to the appearance of a house.

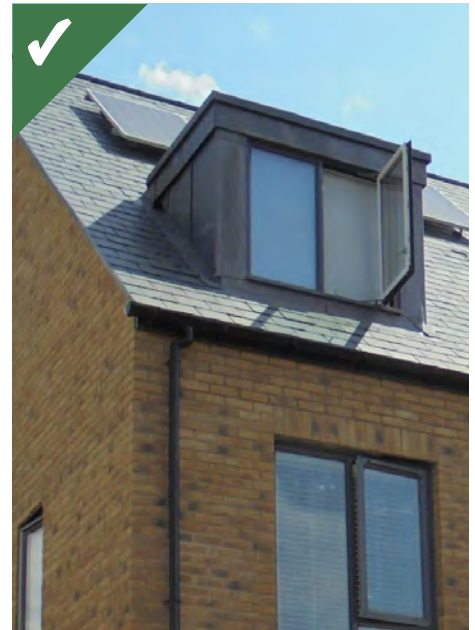


Figure 4.25b: An example of well-designed dormer window, set in from the edges of the roof, with a simple frame that does not draw the attention of the eye.

there is a particular design rationale for introducing a different framing system. Metal frames may be appropriate in contemporary proposals. The quality and appearance of wooden and metal frames tends to be superior to uPVC and are therefore preferable.

- Where the porch is an important part of the original design of a house, these are retained. The enclosure of porches with glazing can interrupt the rhythm of a street and should be avoided. The removal of a porch can result in an under-scaled entrance, diminishing the uniformity of a street where the porch is a feature on all houses.
- Where a porch is added to a dwelling, the building style and impact on the street scene is considered.

## 4.26 MATERIALS

4.26.1 The choice and use of materials for an extension or alteration can significantly impact the appearance of a dwelling. Choice of materials should consider the neighbouring properties and ensure:

- In areas where there is a strong sense of character through the use of particular materials, extensions and alterations should use materials that respond to this character. Where appropriate, this may allow the introduction of new, high-quality materials, including in historic environments where contemporary materials may be used to offer a contrast to the appearance of traditional materials and enhance the qualities of and provide a clear distinction from the original fabric.
- Materials chosen to match the existing dwelling are carefully chosen to consider the effects of weathering and time. This is crucial where materials need to match the existing.
- The long-term wearing of materials is considered. Materials such as render and wood can wear drastically if poorly detailed and not maintained, particularly if north facing.
- The reuse of materials where



Figure 4.26a: Strong and consistent material palette, features and details contributes to character of a suburban street. (Photo: Ruth Ward)

possible for a repair or extension. Elevations which are visible from the street, including roofs, should be prioritised in the reuse of materials. A mixture of old and new materials is more appropriate on rear-facing elevations, and should ensure that similar colours, textures and sizes are used to those of the original roof covering.

4.26.2 Innovation or the use of new materials will be encouraged, except where it detracts from the character of an area.

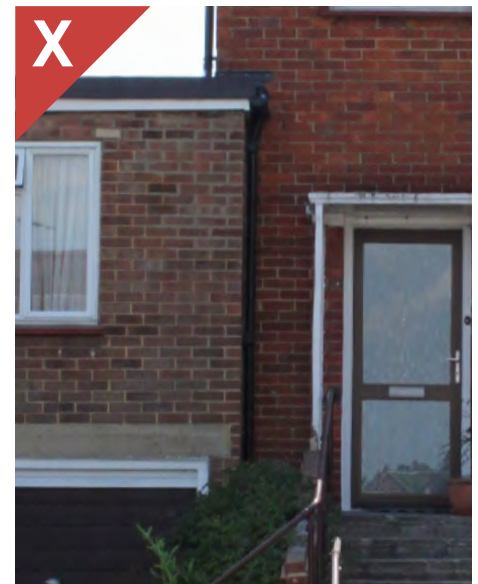


Figure 4.26b: An example of a side extension that attempts to match the existing brick work but fails to do so.



Figure 4.26c: An example of the successful introduction of contemporary materials in this metal clad side extension by HUT Architecture.



Figure 4.26d: An example of inappropriate cladding to a house that hinders the appearance of the street.

## 4.27 ARCHITECTURAL DETAILS & FEATURES

4.27.1 The architectural details and decorative features of a building significantly contribute to the appearance of a dwelling. Design proposals for extensions and alterations should consider the response to existing features and how new details may be introduced to add interest and respond to the local character.

- Where rebuilding part of the existing dwelling, the continuation of plinths, string courses, bond patterns, decorative brickwork, barge boards and fascias should be integrated into the design.
- Decorative features such as terracotta panels, carved bricks, glazed tiles, decorative ridge tiles and finials, lintels or plaques should be retained and restored, if damaged.
- Functional features, such as chimneys help provide rhythm to a street, particularly on semi-detached and terraced housing. Where chimneys are no longer used to service fireplaces, they can provide ventilation and reduce condensation within a home. Where they contribute to the original design, their retention is encouraged. Where a new chimney would be appropriate to the scale and position of an extension, they can assist with the integration into the suburban setting and provide a functional use.
- The addition of contemporary features and details will be encouraged where they respond to the design of the proposal, the existing house and the character of the local area.

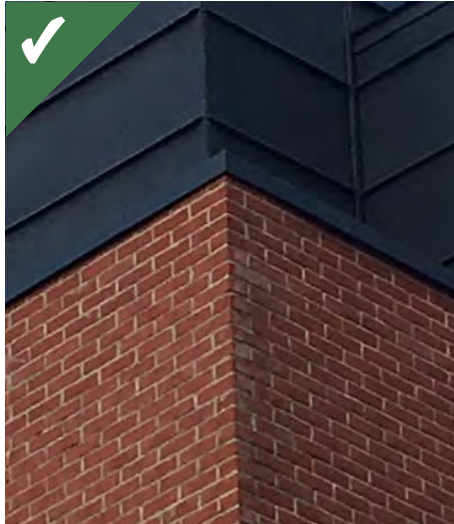


Figure 4.27a: Standing seam metal and brick.

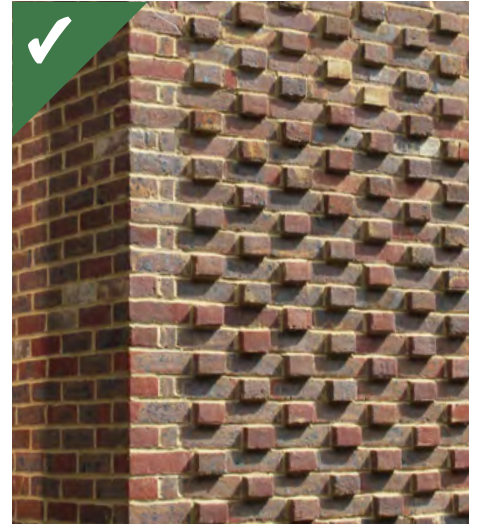


Figure 4.27d: Patterned brickwork.

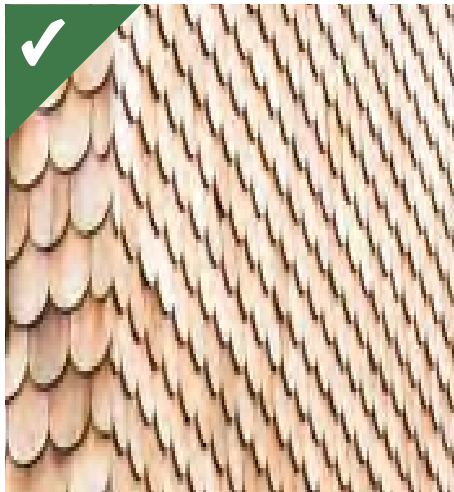


Figure 4.27b: Crafted wooden shingles.



Figure 4.27e: Stepped courses of brickwork.

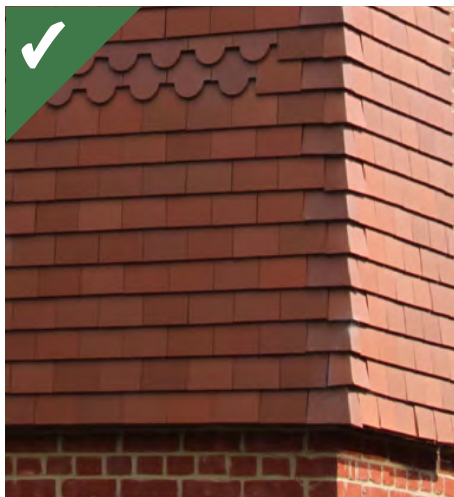


Figure 4.27c: Hung tiles, including decorative tiles.

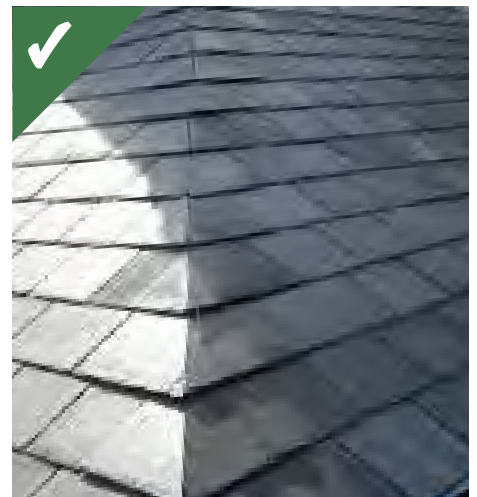


Figure 4.27f: Slate tiles.

# OUTBUILDINGS

## 4.28 BUILDING IN GARDENS

4.28.1 Outbuildings providing additional space associated with a dwelling, such as storage, a home office or summer house should not result in the creation of a separate dwelling and should share access, gardens and services with the main dwelling.

4.28.2 Such proposals may be required to demonstrate that the proposed outbuilding is ancillary to the existing house so as not to be considered a separate dwelling. Where an outbuilding would result in a separate dwelling, applicants should refer to the guidance on subdivision and rear garden development (Refer to Chapter 2).

4.28.3 Outbuildings should be designed to:

- Provide an ancillary function such as a home office, garage or storage.
- Be located in a position that provides access requirements relevant to the use, but should not be dominant in the street scene or in a location where they would appear to add clutter. Consideration should also be given to the level of natural surveillance over the outbuilding.
- Be of a scale that is subservient to the main house. The maximum height and footprint of an outbuilding should be determined on a case-by-case basis, dependent on the size of the plot, scale of the host building and impact on neighbouring amenity.
- Be innovative, standalone buildings. Outbuildings do not need to respond to the style of the host dwelling, except where visible from the street. Where visible from the street, proposals for outbuildings should respond to the character



Figure 4.28a: An example of an outbuilding providing an ancillary living space and home office designed by Surman Weston and Joseph Deane. (Photo: Wai Ming Ng)

of the existing dwelling.

- Ensure that where a garage is proposed, it should not directly abut a pavement or highway. The garage doors should not open onto a pavement or highway.
- Outbuildings and garages should generally be set behind the main building line.

4.28.4 If the outbuilding is to be used as a habitable space<sup>54</sup>, proposals should consider heating (and insulation) and access to light and ventilation.

<sup>54</sup> Habitable spaces may include a home office or study.

# FRONT GARDENS, PARKING & STORAGE

## 4.29 FRONT GARDEN DESIGN, INCLUDING PARKING

4.29.1 Except in certain circumstances<sup>55</sup>, most front garden works do not require planning permission. All front garden works requiring planning permission should follow the guidance below. Where works do not require planning permission, homeowners should consider the following guidance to achieve the best possible outcome. Homeowners should also consider the need to notify neighbours under the Party Wall Act if proposed works may affect a shared boundary and generally for any proposed development.

4.29.2 The design of front gardens, including landscaping, can significantly enhance a home and the character of the street. Proposals for front gardens and forecourt parking should follow the guidance described in Figure 4.29a and:

- Provide parking which is proportionate to the size of the dwelling and avoid paving over a significant amount of the forecourt. Forecourts that are completely covered in hardstanding should be avoided; as a minimum a planted border along all boundaries should be provided.
- Allow sufficient space between the car and the dwelling to allow access to the front door and side of the property. Front garden parking must be designed to avoid cars

<sup>55</sup> Circumstances where planning permission is required include where the property is within a Conservation Area, where the works are dealing with a Tree Protection Order or where a proposal seeks to create a new driveway across the pavement. Applicants should contact Council's Planning Department before undertaking works.

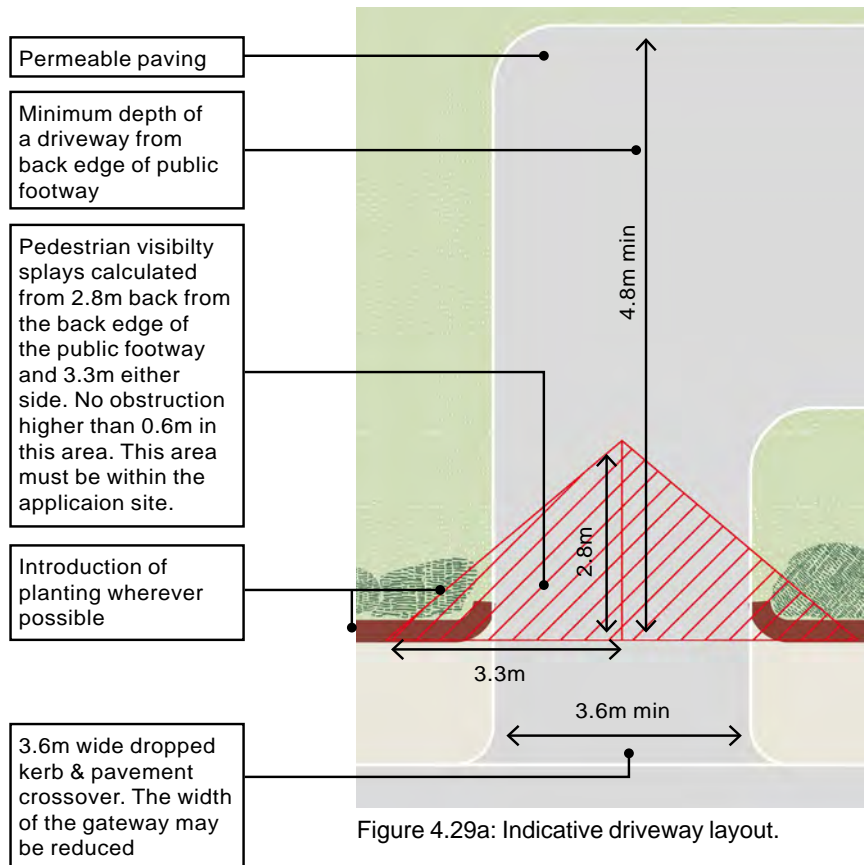


Figure 4.29a: Indicative driveway layout.

- overhanging the pavement.
- Should not include gates. Where gates already exist, they must not open outwards and should allow enough space for them to be opened inwardly (if relevant) whilst a car is parked in the forecourt. Gates should enable a pedestrian on the footway to have clear visibility of any vehicle exiting (i.e. they should be railings or have some form of transparency) and should not be of a height that blocks visibility of passing pedestrians and should enable visibility from the footway.
- Avoid the need to remove any existing trees or established hedges.
- Introduce new planting wherever possible.
- Introduce permeable paving to new areas of hardstanding to minimise rainwater run-off issues, as per the requirements of PD<sup>56</sup>.

<sup>56</sup> For more information, refer to Schedule 2, Part 1, Class F, available at: [http://www.legislation.gov.uk/ukxi/2015/596/pdfs/ukxi\\_20150596\\_en.pdf](http://www.legislation.gov.uk/ukxi/2015/596/pdfs/ukxi_20150596_en.pdf).

- There should be no water run-off from the forecourt onto the public highway.
- Repair or restore any original decorative tiled paths that are a characteristic or historic feature of the existing dwelling.
- Pedestrian and visibility splays for the crossover and vehicle access must be in accordance with Croydon Guidance<sup>57</sup>.
- If a new dropped kerb and crossover is required then applicants must apply for and obtain consent via the Croydon Highways Department<sup>58</sup>.

<sup>57</sup> Available at: <https://www.croydon.gov.uk/transportandstreets/rhps>

<sup>58</sup> For advice, refer to: <https://www.croydon.gov.uk/sites/default/files/articles/downloads/VCO%20application%20Sep%202016.pdf> and <https://www.croydon.gov.uk/sites/default/files/articles/downloads/Residential%20Driveways%20and%20Car%20Accesses.pdf>.

## 4.30 FRONT GARDEN BOUNDARY TREATMENTS

4.30.1 Boundary treatments help to define the relationship between a dwelling and the street. They can include garden walls, fences, railings and hedges. A strong front boundary treatment should be incorporated into proposals, particularly where this is characteristic of the street. Boundary treatments visible from the street should:

- Respond to the design of the dwelling;
- Be consistent with the height of other enclosures on the road;
- Avoid the introduction of different styles along the street. Treatments should reinforce the dominant boundary type along the street, ensuring consistency with the style and age of the property;
- Consider well-maintained planting as an alternative solution and retain any hedgerow;
- Incorporate visibility splays and sight lines for pedestrian and vehicular safety.

## 4.31 REFUSE & CYCLE STORAGE

4.31.1 Refuse and bicycles often create clutter on the street scene. Dedicated external storage can resolve the impact on the character of an area. Where possible, this should be located in a discreet location to the side or rear of a property.

4.31.2 Where storage is located in front of a property, it should be:

- Located away from the front boundary and in a discreet location where it does not intrude on the street scene;

- and
- Be of a design that does not negatively impact the setting of the dwelling or local character. Simple wooden structures or simple metal storage products (Refer to Figure 4.31a and 4.31b) surrounded by landscaping are a common and effective solution, where structurally secure and with a Police security recommendation.



Figure 4.31a: An example of a secure cycle store located in an easily accessible position. (Photo: Trimetals Ltd.)



Figure 4.31b: Ancillary storage for individual homes are best accommodated in the front garden of a property where they are well integrated into landscaping, as demonstrated in the bin stores alongside. (Photo: www.bikebox.london/)





An isometric illustration of a city street scene. The scene is viewed from an elevated perspective, showing a grid of streets. Buildings are rendered in a stylized, blocky manner with various colors like red, orange, and grey. There are several trees with green foliage scattered throughout the scene. A few vehicles, including a red car, a white van, and a motorcycle, are visible on the streets. The overall style is clean and modern, with a focus on geometric shapes and a limited color palette.

# CHAPTER 5: APPENDIX

# GLOSSARY

## **ARCHAEOLOGICAL PRIORITY AREAS:**

Areas that are known to be of archaeological importance because of past finds, excavations or historical evidence.

## **BACK LAND:**

Land behind an area which can be built on or otherwise developed. In some instances, this may include land that is already developed.

## **CONSERVATION AREAS:**

Conservation Areas are designated by the Local Planning Authority. A Conservation Area is an area of special historic or architectural interest that make it unique and are protected by law against undesirable changes. The main attributes that usually define the special character of a Conservation Area are its history and physical appearance, including building form, materials and architectural style. The Planning (Listed Buildings and Conservation Areas) Act 1990 defines the quality of a Conservation Area as being: "the character or appearance of which it is desirable to preserve or enhance". Croydon Council provides specific guidance for these areas in the Conservation Area General Guidance and Conservation Area Appraisal and Management Plans.

## **CROYDON LOCAL PLAN:**

The planning policy document that sets out the spatial vision and plan for the future of the borough and how it will be delivered.

## **EVOLUTION WITHOUT SIGNIFICANT CHANGE OF AN AREA'S CHARACTER:**

This is detailed in the Croydon Local Plan Policies DM10.1-10.10 and is relevant to Chapter 2 of this SPD2.

## **FLEXIBLE BUS:**

This refers to demand-responsive transport where vehicles alter their routes based on particular transport demand rather than using a fixed route or timetable and can be used to provide a public transport service in areas of lower densities where a regular bus service is not considered to be financially viable.

## **FOCUSSED INTENSIFICATION ASSOCIATED WITH CHANGE OF AREA'S LOCAL CHARACTER:**

This is detailed in the Croydon Local Plan Policies DM10.11 and is relevant to Chapter 3 of this SPD.

## **FORECOURT:**

An area to the front of a building which may typically include landscaping and some space for parking.

## **GUIDED INTENSIFICATION:**

This is detailed in the Croydon Local Plan Policies DM34-39 which provide place specific policies for development.

## **HABITABLE ROOMS:**

Habitable rooms are described as any room designed *and* used for sleeping, cooking, living or eating purposes. Undersized rooms performing these functions will not be considered habitable rooms, and this will be judged on a case by case basis. Enclosed spaces such as bathrooms or toilet facilities, service rooms, corridors, laundries, hallways, utility rooms or similar spaces are not considered to be habitable rooms. Ancillary spaces in a separate structure to the main dwelling, such as garden rooms, are not considered to be habitable rooms.

## **HARDSTANDING:**

An area of paved ground (for example with tiles, bricks, pavers or concrete etc.) that sits outside the external envelope of a property. This may include driveways and patios.

**HERITAGE ASSET:**

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).

**HIGH QUALITY DESIGN:**

A design that has a developed approach to character, with a massing and coherent form that responds to the site context and provides good standards of accommodation and amenity, internally and externally, making use of quality materials and detailing.

**HIT & MISS BRICKWORK OR STONE:**

Brick or stone that is stacked with spaces between the bricks/stones. These spaces are generally of a size that reduces perceived overlooking sufficiently whilst allowing light to filter through.

**HOST DWELLING:**

This is a dwelling which is under the same ownership and forms part of the original plot on which development is proposed.

**INCOHERENT FORM:**

The shape (in plan and/or section and/or elevation) of a development that is overly complicated and negatively impacts the appearance of a proposal.

**LISTED BUILDINGS:**

Means a building which is for the time being included in a list compiled or approved by the Secretary of State under this section; and for the purposes of this Act -

(a) any object or structure fixed to the building;

(b) any object or structure within the curtilage of the building which, although not fixed to the building, forms part of the land and has done so since before 1st July 1948, shall subject to subsection (5A)(a) be treated as part of the building.

**LOCAL HERITAGE AREAS:**

Local Heritage Areas (LHA) is a designation based upon the original criteria for designating Local Areas of Special Character. The criteria for designating an area as an LHA were consulted upon in autumn 2013 as part of the Croydon Local Plan: Detailed Policies (Preferred and Alternative Options). To be designated as an LHA an area:

- Must be of heritage significance; and

- Meet one or more of the following three criteria:

1. Architecture – the architecture in the area must be of a high quality, distinctive and well preserved. This is because the collective value of a group of historic buildings has a consistent architectural form, style, features, detailing or materials and the group will often, but not always, have been built as a single development over a short period of time.
2. Townscape – the townscape of the area must be of a high quality, distinctive and well preserved. This is because of the attractive and historic composition of the urban form and the area will often, but not always, have been planned.
3. Landscape – the landscape of the area must be of a high quality, distinctive and well preserved. This is because of the distinguishing quality, extent or features of its historic landscape and it will often, but not always, have been planned.

### **LOCALLY LISTED BUILDINGS:**

The locally listed buildings and structures within Croydon are considered by the public and the Council as having special local architectural or historic interest, to be of significance to the local community and to contribute to the environmental and cultural heritage of the borough. All locally listed buildings should satisfy at least two of the following criteria:

- **Authenticity:** Buildings and groups selected for the local list should be substantially unaltered and retain the majority of their original features;
- **Architectural significance:** Buildings which are of good architectural quality or are good examples of a particular building type;
- **Historical significance:** Buildings which represent specific architectural and social building periods or which are associated with, local historical events, the development of Croydon, well known people or noted designers;
- **Technical significance:** Buildings that display exceptional innovation and craftsmanship;
- **Townscape Value:** Buildings and/or groups of buildings which due to their form, massing, appearance and positive role in the streetscene, such as key corner buildings, local landmarks, uniformly designed terraces.

### **LOCALLY LISTED HISTORIC PARKS AND GARDENS:**

The criteria for the local list of historic parks and gardens are set by Historic England along with the London Parks and Gardens Trust. This stipulates that the site have at least one of the following:

- evident historic features or design
- buried archaeology
- connections with famous designers or nurserymen
- connections with nationally or locally famous individuals
- a design typical of a landscape style.

### **LONDON PLAN:**

The strategic plan for London, setting out an economic, environmental, transport and social framework for development.

### **NATIONAL PLANNING POLICY FRAMEWORK (NPPF):**

The National Planning Policy Framework is a key part of Government reforms to make the planning system less complex and more accessible, and to promote sustainable growth. The NPPF replaces all existing Planning Policy Statements and Planning Policy Guidance.

### **OUTRIGGER:**

An addition to the main building mass, commonly through a rear extension that is not full-width. These are common in terraced houses and often are part of the original dwelling.

### **OVERBEARING:**

Where a development is considered to have an unreasonable impact on neighbouring and local amenity as a result of its scale and appearance. The level of reasonableness is dependent on the site context and must be balanced by the need to provide homes. Developments that adhere to the guidance within SPD2 will generally not be considered to be overbearing, however this will be judged on a case by case basis.

### **PERMITTED DEVELOPMENT:**

Permitted development rights are a national grant of planning permission which allow certain building works and changes of use to be carried out without having to make a planning application.

### **RAINWATER GOODS:**

Items attached to a dwelling to remove rainwater from roofs into the drainage system.

### **REAR GARDEN DEVELOPMENT:**

The construction of new buildings in rear gardens of the existing properties.

**REGISTERED PARKS AND GARDENS:**

A site included on the Register of Historic Parks and Gardens in England. Registered parks and gardens are designated heritage assets and subject to the planning policies within the NPPF.

**SCHEDULED MONUMENTS:**

Means any monument which is for the time being included in the schedule (compiled and maintained by the Secretary of State for Culture, Media and Sport).

**SELF-PROVIDED HOUSING:**

This is the delivery of housing that is steered by the future resident(s). This commonly includes community-led, self-build and custom build housing.

**SETTING OF A HERITAGE ASSET:**

The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

**SIGNIFICANCE:**

- 1) The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.
- 2) The sum of the cultural and natural heritage values of a place, often set out in a statement of significance.

**STREET:**

A road that is either adopted or to an adoptable standard, and does not include rear access lanes or driveways.

**SUBURB:**

A predominantly residential area that has emerged on the outskirts of district and metropolitan centres.

**TRANSPORT FOR LONDON (TFL):**

Transport for London (TfL) is the organisation responsible for London's transport system. Its role is to implement the Mayor's Transport Strategy and manage transport services in London, for which the Mayor has ultimate responsibility.

**UN-NEIGHBOURLY WINDOWS:**

Where such a window already exists on any type of development (including windows within extensions), it is a window that faces onto a potential development site in a way that would not be permitted if the window did not currently exist as it would unreasonably preclude development on the neighbouring site. Where such a window does not currently exist, it is a window proposed within any type of development application (including extensions) that would unduly preclude development on the neighbouring site.

# FIGURES

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  - 4.26c - HUT Architecture
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  - 4.31a - Trimetals Ltd.
  - 4.31b - Photo: www.bikebox.london
- Animation stills - Matthew Lucraft

# Equality Analysis Form

## 1. Introduction

### 1.1 Purpose of Equality Analysis

The council has an important role in creating a fair society through the services we provide, the people we employ and the money we spend. Equality is integral to everything the council does. We are committed to making Croydon a stronger, fairer borough where no community or individual is held back.

Undertaking an Equality Analysis helps to determine whether a proposed change will have a positive, negative, or no impact on groups that share a protected characteristic. Conclusions drawn from Equality Analyses helps us to better understand the needs of all our communities, enable us to target services and budgets more effectively and also helps us to comply with the Equality Act 2010.

An equality analysis must be completed as early as possible during the planning stages of any proposed change to ensure information gained from the process is incorporated in any decisions made.

In practice, the term '**proposed change**' broadly covers the following:-

- Policies, strategies and plans;
- Projects and programmes;
- Commissioning (including re-commissioning and de-commissioning);
- Service review;
- Budget allocation/analysis;
- Staff restructures (including outsourcing);
- Business transformation programmes;
- Organisational change programmes;
- Processes (for example thresholds, eligibility, entitlements, and access criteria).

## 2. Proposed change

<b>Directorate</b>	<b>Planning &amp; Sustainable Regeneration - Spatial Planning, Place</b>
<b>Title of proposed change</b>	<b>Local Plan Supplementary Planning Document - Revocation</b>
<b>Name of Officer carrying out Equality Analysis</b>	<b>Julia Dawe</b>



## 2.1 Purpose of proposed change (see 1.1 above for examples of proposed changes)

Briefly summarise the proposed change and why it is being considered/anticipated outcomes. What is meant to achieve and how is it seeking to achieve this? Please also state if it is an amendment to an existing arrangement or a new proposal.

This Equality Analysis has become necessary following Mayor Perry's manifesto pledge in 2022 to revoke one of the Council's adopted Supplementary Planning Documents "The Croydon Suburban Design Guide" (SPD2). SPD2 is not a policy document but provides guidance, information, clarification and amplifies how the Council's Local Plan policies should be applied to planning applications. Whilst SPD2 is not a policy document it will result in a change as it may place more reliance on the interpretation of the adopted Local Plan policies, which are clearly subject to Equality Analysis.

This EQIA does **NOT** apply to the Council's adopted Local Plan. The Local Plan EQIA is a separate approved document.

This EQIA has been undertaken to assess the impact of the revocation of SPD2 on equality issues and takes account of the publication of the new Equality Strategy 2020-2024.

## 3. Impact of the proposed change

**Important Note:** It is necessary to determine how each of the protected groups could be impacted by the proposed change. Who benefits and how (and who, therefore doesn't and why?) Summarise any positive impacts or benefits, any negative impacts and any neutral impacts and the evidence you have taken into account to reach this conclusion. Be aware that there may be positive, negative and neutral impacts within each characteristic.

Where an impact is unknown, state so. If there is insufficient information or evidence to reach a decision you will need to gather appropriate quantitative and qualitative information from a range of sources e.g. Croydon Observatory a useful source of information such as Borough Strategies and Plans, Borough and Ward Profiles, Joint Strategic Health Needs Assessments <http://www.croydonobservatory.org/> Other sources include performance monitoring reports, complaints, survey data, audit reports, inspection reports, national research and feedback gained through engagement with service users, voluntary and community organisations and contractors.

### 3.1 Deciding whether the potential impact is positive or negative

**Table 1 – Positive/Negative impact**

For each protected characteristic group show whether the impact of the proposed change on service users and/or staff is positive or negative by briefly outlining the nature of the impact in the appropriate column. . If it is decided that analysis is not relevant to some groups, this should be recorded and explained. In all circumstances you should list the source of the evidence used to make this judgement where possible.

Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence
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Age	<p>The adopted Local Plan policies support additional growth in housing and greater choice. Policies seek to enable more genuinely affordable housing for people in older age groups (75 plus) who are forecast to increase by 77%, families with children and young households on low incomes. Housing development will contribute to outcomes 3 and 4 of the Equality Strategy by addressing individual needs as they arise, providing greater choice and more affordable options and supporting good health outcomes for older people, enabling them greater opportunities to remain living in their homes.<sup>1</sup>The SPD2: Suburban Design Guide provides key design principles for housing development in accordance with the policies in the Croydon Local Plan to help to ensure suburban growth is suitable and sustainable</p>	<p>No significant negative impact has been identified.</p> <p>The revocation of SDP2, whilst not impacting on the adopted policies in the Local Plan will place more emphasis on the interpretation of policy leading to less certainty in outcomes.</p> <p>The time taken for the Council to process planning applications may slow down as a result and with less guidance for applications it may be difficult to determine whether an application is acceptable and for the applicant to know what would be acceptable. It needs to be considered whether there are sufficient resources to deal with this additional work in a timely manner. This may result in more applications going to appeal which will</p>	<p>Evidence to test the impact of policies has been collected from a range of sources: Croydon Observatory; 2011 Census; Croydon strategic policy documents; ONS, Housing Need data; Health data, Adult and Children services data. This has been collated into a borough profile and key facts and issues document.</p>
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<sup>1</sup> <https://www.croydon.gov.uk/sites/default/files/articles/downloads/Croydon%20SHMA%20Update%20-%20V6.pdf?src=redirection-fix>

		<p>further delay outcomes.</p> <p>Overall delays in processing planning applications effectively may adversely affect housing delivery and particularly affordable and specialist housing for which there is a recognised need.</p>	
Disability	<p>There are policies in the adopted Croydon Local Plan which seek to increase the provision of low cost rented housing and to ensure it is genuinely affordable that will benefit disabled households who are more likely to be on low incomes and dependent on affordable housing. The data suggests that across Croydon, some 28% of households contain someone with a Long term health problem or disability (LTHPD). The policy also supports the provision of accessible housing (M4(2)) and homes for wheelchair users (M4(3)). Policies seeking an increased in supported bedspaces for people with disabilities will benefit people with mental health issues, physical disability and learning disability kitchens and improvements to parks and</p>	<p>No significant negative impact has been identified.</p> <p>The revocation of SDP2, whilst not impacting on the adopted policies in the Local Plan will place more emphasis on the interpretation of policy leading to less certainty in outcomes.</p> <p>The process of determining planning applications may slow down as a result and with less guidance it may be difficult to determine whether an application is acceptable and for the applicant to know what would be acceptable. It needs to be considered</p>	<p>Evidence to test the impact of policies has been collected from a range of sources: Croydon Observatory; 2011 Census; Croydon strategic policy documents; ONS, Housing Need data; Health data, Adult and Children services data. This has been collated into a borough profile and key facts and issues document.</p> <p>Section 6 - <a href="#">Strategic Housing Market Assessment Update</a></p>

	<p>open spaces to accommodate accessible community events and activities and co-located services that are inclusive will increase the participation of disabled people. The housing proposals will contribute to outcomes 3 and 4 of the Equality Strategy by seeking to increase the provision of accessible housing for people with disabilities (including those with invisible disabilities) and of specialist supported housing for vulnerable and disabled people, which will help meet arising needs and support improved health outcomes.</p> <p>The SPD2: Suburban Design Guide provides key design principles that expand upon how the policies will be delivered.</p>	<p>whether there are sufficient resources to deal with this additional work in a timely manner. This may result in more applications going to appeal which will further delay outcomes.</p> <p>Overall delays in processing planning applications effectively may potentially affect the delivery of affordable housing for vulnerable people and those with disabilities.</p>	
Sex	<p>There are Policies in the adopted Croydon Local Plan which seek support the provision of genuinely affordable low cost rented housing, which will help meet the housing needs of low-income households and positively impact on female headed low parent households who are more likely to experience low</p>	<p>No significant negative impact has been identified.</p> <p>The revocation of SDP2, whilst not impacting on the adopted policies in the Local Plan will place more emphasis on the interpretation of policy leading to</p>	<p>Evidence to test the impact of policies has been collected from a range of sources: Croydon Observatory; 2011 Census; Croydon strategic policy documents; ONS, Housing Need data; Health data, Adult and Children services data. This has been collated into a borough profile and key facts and issues document.</p> <p>Section 6 - <a href="#">Strategic Housing Market Assessment Update</a></p>

	<p>income, poverty and homelessness and are disproportionately represented among those in housing need. 4, by addressing social isolation.</p> <p>The SPD2: Suburban Design Guide provides key design principles for housing development in accordance with the policies in the Croydon Local Plan to help to ensure suburban growth is suitable and sustainable</p>	<p>less certainty in outcomes.</p> <p>The process of determining planning applications may slow down as a result and with less guidance it may be difficult to determine whether an application is acceptable and for the applicant to know what would be acceptable. It needs to be considered whether there are sufficient resources to deal with this additional work in a timely manner. This may result in more applications going to appeal which will further delay outcomes.</p> <p>Overall delays in processing planning applications effectively may potentially affect the delivery of affordable housing for specific low income single/lone parent groups.</p>	
<p>Gender Identity</p>	<p>No specific positive impacts have been identified.</p>	<p>No significant negative impact has been identified.</p>	

Marriage or Civil Partnership	No specific positive impacts have been identified.	No significant negative impact has been identified.	
Religion or belief	No specific positive impacts have been identified.	No significant negative impact has been identified.	
Race	<p>Policies supporting the provision of genuinely affordable housing to meet the housing needs of low-income households will positively impact on our African, African Caribbean and other global ethnic households who are more likely to experience poverty, overcrowding and homelessness and are disproportionately represented among those in housing need.</p> <p>Housing proposals seeking to increase the provision of affordable housing will support the achievement of outcome 3 of the Equality Strategy by improving access to housing for African, African Caribbean and other global ethnic households who are more likely to experience low incomes, homelessness and housing need.</p> <p>The SPD2: Suburban Design Guide provides key design principles that support the objectives of the Croydon Local Plan to help to ensure</p>	<p>No significant negative impact has been identified.</p> <p>The revocation of SDP2, whilst not impacting on the adopted policies in the Local Plan will place more emphasis on the interpretation of policy leading to less certainty in outcomes.</p> <p>The process of determining planning applications may slow down as a result and with less guidance it may be difficult to determine whether an application is acceptable and for the applicant to know what would be acceptable. It needs to be considered whether there are sufficient resources to deal with this additional work in a timely manner. This may result in more applications going to</p>	<p>Evidence to test the impact of policies has been collected from a range of sources: Croydon Observatory; 2011 Census; Croydon strategic policy documents; ONS, Housing Need data; Health data, Adult and Children services data. This has been collated into a borough profile and key facts and issues document.</p> <p>Section 6 - <a href="#">Strategic Housing Market Assessment Update</a></p>

	<p>suburban growth is suitable and sustainable including:</p> <ul style="list-style-type: none"> <li>• Providing homes for people of all ages and needs to live in one neighbourhood, with the services to support them;</li> <li>• Contributing to the community's health and well-being;</li> <li>• Contributing to economic activity and prosperity; and •</li> <li>• Supporting and encouraging social cohesion.</li> </ul>	<p>appeal which will further delay outcomes.</p> <p>Overall delays in processing planning applications effectively may potentially affect the delivery of affordable housing for low income African, African Caribbean and other global ethnic households and weaken the support for achieving outcome 3 of the Equality Strategy by improving access to African, African Caribbean and other global ethnic households.</p>	
Sexual Orientation	No specific positive impacts have been identified.	No significant negative impact has been identified.	<p>Evidence to test the impact of policies has been collected from a range of sources: Croydon Observatory; 2011 Census; Croydon strategic policy documents; ONS, Housing Need data; Health data, Adult and Children services data. This has been collated into a borough profile and key facts and issues document.</p> <p>Section 6 -<a href="#">Strategic Housing Market Assessment Update</a></p>
Pregnancy or Maternity	Policies supporting the provision of genuinely affordable housing to meet the housing needs of low-income households will positively impact on pregnant women in housing need who have a recognised priority	<p>No significant negative impact has been identified.</p> <p>The revocation of SDP2, whilst not impacting on the adopted policies in the Local Plan will</p>	<p>Evidence to test the impact of policies has been collected from a range of sources: Croydon Observatory; 2011 Census; Croydon strategic policy documents; ONS, Housing Need data; Health data, Adult and Children services data. This has been collated into a borough profile and key facts and issues document.</p> <p>Section 6 -<a href="#">Strategic Housing Market Assessment Update</a></p>

	<p>need for low cost rented housing. Policies seeking to increase the provision of affordable housing will support the achievement of outcome 3 of the Equality Strategy by improving access to housing for pregnant women who are homeless or in housing need.</p> <p>The SPD2: Suburban Design Guide provides key design principles that support the objectives of the Croydon Local Plan to help to ensure suburban growth is suitable and sustainable including:</p> <ul style="list-style-type: none"> <li>• Providing homes for people of all ages and needs to live in one neighbourhood, with the services to support them;</li> <li>• Contributing to the community's health and well-being;</li> <li>• Contributing to economic activity and prosperity; and •</li> <li>• Supporting and encouraging social cohesion.</li> </ul>	<p>place more emphasis on the interpretation of policy leading to less certainty in outcomes.</p> <p>The process of determining planning applications may slow down as a result and with less guidance it may be difficult to determine whether an application is acceptable and for the applicant to know what would be acceptable. It needs to be considered whether there are sufficient resources to deal with this additional work in a timely manner. This may result in more applications going to appeal which will further delay outcomes.</p> <p>Overall delays in processing planning applications effectively may potentially affect the delivery of affordable housing for specific low income single/lone parent groups.</p>	
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**Important note:** You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations, this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts.

When you act to reduce any negative impact or maximise any positive impact, you must ensure that this does not create a negative impact on service users and/or staff belonging to groups that share protected characteristics. **Please use table 4 to record actions that will be taken to remove or minimise any potential negative impact**

### 3.2 Additional information needed to determine impact of proposed change

**Table 2 – Additional information needed to determine impact of proposed change**

If you need to undertake further research and data gathering to help determine the likely impact of the proposed change, outline the information needed in this table. Please use the table below to describe any consultation with stakeholders and summarise how it has influenced the proposed change. Please attach evidence or provide link to appropriate data or reports:

Additional information needed and or Consultation Findings	Information source	Date for completion
None identified		

For guidance and support with consultation and engagement visit <https://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-engagement/starting-engagement-or-consultation>

### 3.3 Impact scores

Example

If we are going to reduce parking provision in a particular location, officers will need to assess the equality impact as follows;

1. Determine the Likelihood of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the likelihood of impact score is 2 (likely to impact)
2. Determine the Severity of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the Severity of impact score is also 2 (likely to impact)
3. Calculate the equality impact score using table 4 below and the formula **Likelihood x Severity** and record it in table 5, for the purpose of this example - **Likelihood (2) x Severity (2) = 4**

**Table 4 – Equality Impact Score**

<b>Severity of Impact</b>	3	3	6	9
	2	2	4	6
	1	1	2	3

		1	2	3
<b>Likelihood of Impact</b>				

**Key**

Risk Index	Risk Magnitude
6 – 9	High
3 – 5	Medium
1 – 3	Low

**Table 3 – Impact scores**

Column 1 <b>PROTECTED GROUP</b>	Column 2 <b>LIKELIHOOD OF IMPACT SCORE</b>	Column 3 <b>SEVERITY OF IMPACT SCORE</b>	Column 4 <b>EQUALITY IMPACT SCORE</b>
	<p>Use the key below to <b>score</b> the <b>likelihood</b> of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p><b>1 = Unlikely to impact</b> <b>2 = Likely to impact</b> <b>3 = Certain to impact</b></p>	<p>Use the key below to <b>score</b> the <b>severity</b> of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p><b>1 = Unlikely to impact</b> <b>2 = Likely to impact</b> <b>3 = Certain to impact</b></p>	<p>Calculate the <b>equality impact score</b> for each protected group by multiplying scores in column 2 by scores in column 3. Enter the results below against each protected group.</p> <p><b>Equality impact score = likelihood of impact score x severity of impact score.</b></p>
Age	2	2	4
Disability	2	2	4
Sex	2	2	4
Gender identity	1	1	1
Marriage / Civil Partnership	1	1	1
Race	2	2	4
Religion or belief	1	1	1
Sexual Orientation	1	1	1
Pregnancy or Maternity	2	1	2

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## 4. Statutory duties

## Equality Analysis

### 4.1 Public Sector Duties

Tick the relevant box(es) to indicate whether the proposed change will adversely impact the Council's ability to meet any of the Public Sector Duties in the Equality Act 2010 set out below.

Advancing equality of opportunity between people who belong to protected groups

Eliminating unlawful discrimination, harassment and victimisation

Fostering good relations between people who belong to protected characteristic groups

**Important note:** If the proposed change adversely impacts the Council's ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in section 5 below.

The proposed policies will assist in advancing equality of opportunity and good relations between people who belong to protected groups and in other areas will have no specific impact on people who belong to protected groups.

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## 5. Action Plan to mitigate negative impacts of proposed change

**Important note:** Describe what alternatives have been considered and/or what actions will be taken to remove or minimise any potential negative impact identified in Table 1. Attach evidence or provide link to appropriate data, reports, etc:

The proposed policies are generally assessed to have positive or neutral impacts on people from protected groups and any potential negative impacts have been assessed to have a low equality impact score. No specific actions have been identified as necessary.

**Table 4 – Action Plan to mitigate negative impacts**

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions mitigate them.				
Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion

# Equality Analysis

Disability	<b>The slowing down and or reduction in supply of homes for those with disabilities. x</b>	<b>Use existing adopted Local Plan policies; Monitor whether determining planning applications start taking longer to be determined; Monitor the number of planning applications determined at appeal.</b>	<b>Heather Cheesbrough</b>	<b>N/A</b>
Race	<b>The reduction in the delivery of housing may impact those</b> by reducing access to housing for BAME households who are more likely to experience low incomes, homelessness and housing need.	<b>Use existing adopted Local Plan policies; Monitor timelines for determining planning applications; and Monitor the number of planning applications determined at appeal</b>	<b>Heather Cheesbrough</b>	<b>N/A</b>
Sex	<b>There may be a reduction in the supply of housing resulting in</b> overcrowding and homelessness and are disproportionately represented by single female households in housing need.	<b>Use existing adopted Local Plan policies; Monitor timelines for determining planning applications; and Monitor the number of planning applications determined at appeal</b>	<b>Heather Cheesbrough</b>	<b>N/A</b>
Gender identity				
Sexual orientation				
Age	There may be a reduction in the supply of housing resulting in less choice and the lack of affordable options which would support good health outcomes for older people whilst living in their own homes.	<b>Use existing adopted Local Plan policies; Monitor timelines for determining planning applications; and Monitor the number of planning applications determined at appeal</b>	<b>Heather Cheesbrough</b>	<b>N/A</b>
Religion or belief				

# Equality Analysis

Pregnancy or maternity	x	<b>Use existing adopted Local Plan policies Monitor timelines for determining planning applications; and Monitor the number of planning applications determined at appeal</b>	<b>Heather Cheesbrough</b>	<b>N/A</b>
Marriage/civil partnership				

## 6. Decision on the proposed change

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Based on the information outlined in this Equality Analysis enter <b>X</b> in column 3 ( <b>Conclusion</b> ) alongside the relevant statement to show your conclusion.		
<b>Decision</b>	<b>Definition</b>	<b>Conclusion - Mark 'X' below</b>
No major change	<p>Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review. <b>If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.</b></p> <p>We have undertaken detailed analysis of the impact of the revocation of the <b>SPD2 Suburban Design Guide</b> in relation to all groups with protected characteristics and identified the impacts to be positive or neutral.</p>	<b>X</b>
Adjust the proposed change	<p>We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. <b>If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form</b></p>	
Continue the proposed change	<p>We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned. <b>If you reach this conclusion, you should clearly set out the justifications for doing this and it must be in line with the duty to have due regard and how you reached this decision.</b></p>	

## Equality Analysis

Stop or amend the proposed change	Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.	
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet	Meeting title: Cabinet Date: June 2022	

### 7. Sign-Off

<b>Officers that must approve this decision</b>	
<b>Equalities Lead</b>	<b>Name: Denise McCausland Date: 9 June 2022</b> <b>Position: Equalities Manager</b>
<b>Director</b>	<b>Name: Heather Cheesbrough Date: 6 June 2022</b> <b>Position: Director of Planning &amp; Sustainable Regeneration</b>

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# Agenda Item 7

<b>REPORT TO:</b>	Streets, Environment & Homes Scrutiny Sub-Committee 5 <sup>th</sup> July 2022
<b>SUBJECT:</b>	<b>Housing Directorate Overview</b>
<b>LEAD OFFICER:</b>	<b><i>Susmita Sen, Corporate Director for Housing</i></b>
<b>CABINET MEMBER:</b>	<b><i>Councillor Lynne Hale, Cabinet Member for Homes</i></b>
<b>PERSON LEADING AT SCRUTINY COMMITTEE MEETING:</b>	<b><i>Justin Hunt – Director of Tenancy Services</i></b>
<b>PUBLIC/EXEMPT:</b>	Public

<b>ORIGIN OF ITEM:</b>	The Scrutiny Sub-Committee will receive an overview of the Housing Directorate to assist in work programming for the rest of the year.
<b>BRIEF FOR THE COMMITTEE:</b>	This report provides an overview of the Housing Directorate to inform the development of the Committee's work programme including: <ul style="list-style-type: none"><li>• Key priorities for the year</li><li>• Budget</li><li>• Performance</li><li>• Key risks and mitigations</li></ul>

## 1. EXECUTIVE SUMMARY

- 1.1. In May 2021, the Regulator of Social Housing determined that the Council's landlord services were in breach of both the Homes Standard and the Tenant Involvement & Empowerment Standard following the publication of the ARK Consultancy Investigation into conditions at 1-87 Regina Road, South Norwood.
- 1.2. The ARK Consultancy investigation identified a series of failings by our housing service and whilst some progress has been made to address these issues, the housing service must be reshaped and reinvigorated to reflect the views of our residents and address comprehensively the root causes of these failings. The directorate must ensure that these improvements align with the Council's statutory duties under the Fire Safety Act 2021, Building Safety Act 2022, and the Social Housing Regulation Bill.

- 1.3. The Council's existing Housing Improvement Plan is not fit-for-purpose to deliver the transformative change required. The independent Housing Improvement Board's report to the March 2022 Cabinet stated that the existing Plan required "considerable further work" whilst the Executive has been elected with the mandated of "strengthen[ing] the Housing Improvement Plan". Subsequently, the Plan must be strengthened to reflect the call for changes from both the electorate and the Housing Improvement Board.
- 1.4. The challenges the directorate faces are not limited to the Council's landlord services; the directorate faces a demand for homelessness services which is higher than the mean for all London boroughs. The cost-of-living crisis in combination with a high number of households placed in temporary accommodation from outside of the borough has limited the Council's supply of housing to our most vulnerable residents. An improvement plan which spans both the Council's landlord and homelessness services must be developed to enable the directorate to provide assurance to the Department for Levelling Up, Housing & Communities and the Regulator for Social Housing.
- 1.5. The Council recognises that staff have been working hard to deliver the housing service in difficult times. A bespoke culture change plan will be developed for the directorate to align with the Council-wide corporate change plan. The culture change plan will equip, support and engage staff to deliver tenant-centric services and treat residents with empathy and respect. The adoption of the Residents' Chart by the Mayor is an important step towards a genuine partnership with residents on service delivery.

## **2. SETTING THE DIRECTION AND STRATEGIC DEVELOPMENT**

- 2.1. The Council must co-create with residents, staff and Members a shared vision and mission for the directorate with customers at the heart of how services are delivered. The co-creation of a vision and mission will be key to supporting staff by setting a clear direction for the directorate.
- 2.2. The vision and mission will be outlined in the strengthened Housing Improvement Plan which will be reshaped and reinvigorated to reflect the views of our residents and address comprehensively the root causes of service failings.
- 2.3. The vision for the directorate will be co-created with residents through a comprehensive series of engagement sessions to ensure the Council provides housing services that are tailored to our residents. The development of the vision and mission will therefore align with Charter for Social Housing Residents: social housing white paper and Social Housing Regulation Bill.
- 2.4. The vision and mission will reflect the Council's ambition to develop the best landlord services in London, and this cannot be done in isolation

from our stakeholders. The directorate will seek to learn from best practice in the sector to set a strategic direction which has targets and objectives.

- 2.5. The directorate must be honest and transparent with our stakeholders by setting the expectation for what we want to achieve, and by what timescales. The re-shaping and reinvigoration of the housing directorate is a long-term project which will take place in phases. Timescales will be developed to set the expectation as to what will be achieved at each stage.
- 2.6. A Cabinet paper further detailing the directorate's reinvigoration of the Housing Improvement Plan is available online. An update on the plan, including an update on the vision and mission for the housing directorate, will be presented to Cabinet in November 2022.

### **3. WORKFORCE DEVELOPMENT**

- 3.1. Cultural transformation will be fundamental to ensuring the success of the directorate's improvement plans. Staff have been working hard to deliver the housing service in difficult times, and more must be done to ensure staff are supported and developed to deliver in their roles. As such, central to the transformation of the housing directorate will be the professionalisation of the housing workforce to improve employee capability and retention. The attraction and retention of housing staff presents a risk to the improvements to the housing service, and the directorate's workforce development plans will be key to mitigating this risk.
- 3.2. The directorate will be initiating a bespoke culture change programme, in addition to the Council-wide 'Crossing the Threshold' culture change programme, which will provide a tailored learning and development offer to housing staff. The bespoke culture change plan must create an honest and open culture that ensures that housing staff across the directorate feel empowered to voice their concerns and propose improvements.
- 3.3. A key objective of the culture change programme will be to ensure staff are equipped to treat residents with empathy and respect to ensure compliance with the Regulator of Social Housing's Tenant Involvement & Empowerment Standard Staff. Commitment to treating residents with empathy and respect is detailed in the [Residents' Charter](#) which was adopted by the Executive Mayor at June 2022 Cabinet.

#### **4. CUSTOMER JOURNEY**

- 4.1. To ensure a root and branch transformation of the housing services, a comprehensive review of key touchpoints for customers must be undertaken.
- 4.2. The directorate's priorities for improving customer journey will include an end-to-end review of voids and an end-to-end review of complaints aligned with the Housing Ombudsman's Complaints Handling code.
- 4.3. The re-procurement of our responsive repairs contract will also allow the Council and residents to re-shape the responsive repairs service to ensure customers are treated with respect, and targets for the completion of repairs are met.
- 4.4. Customer journey with regards to the Council's homelessness services must also be considered. A Homelessness Prevention & Rough Sleeping Strategy will be presented to Cabinet in March 2023 which will outline our increased focus on preventing homelessness and will review the routes into and out of our homelessness services. The development of a Temporary Accommodation Strategy will include a review of our current accommodation provision to ensure it meets the needs of our most vulnerable residents.
- 4.5. The review of our customer touchpoints will be founded upon an audit of our service and performance data to enable the directorate to meet demand and forecast residents' needs.

#### **5. REGINA ROAD**

- 5.1. A programme of repairs has been undertaken to improve conditions at the three Regina Road blocks, but progress to improve the blocks needs to accelerate.
- 5.2. All three blocks require significant capital investment. The directorate's priority is to ensure that a decision is made with regards to the future of the blocks that is timely, value-for-money and provides the right housing options for our residents.
- 5.3. The housing directorate will be recruiting a dedicated programme manager to develop an options appraisal for the estate. The programme manager will reinvigorate the existing work on the estate and develop solutions in consultation with residents.

#### **6. ASSET MANAGEMENT**

- 6.1. The Council expects to invest approximately £750m in its housing stock, and an Asset Management Strategy will be required to ensure the investment represents value for money. To develop the strategy, the

Council will need to have confidence in its stock condition data, and its ability to utilise it. The launch of the NEC Housing system in November 2022 will be key to ensuring the directorate is able to collect and share real-time data on asset condition and performance.

- 6.2. The Asset Management Strategy will enable our future procurement needs to be met and will include a review of our contract management processes to ensure our contractors deliver a value-for-money service where performance indicators are met.
- 6.3. The Asset Management Strategy will be presented to full Council in January 2023.

## **7. BUDGET**

- 7.1. The housing directorate has an £8m net General Fund (GF) budget. Total expenditure of £48m consists mainly of:
  - £35.7m of rental payments and temporary housing charges
  - £8m employee costs
  - £4.3m made up of third-party payments; bad debt provision, legal fees, and other supplies and services.
- 7.2. Income of £40m is made up of:
  - £28m of housing benefit receipts
  - £7.4m government grant for homelessness
  - £4.4m of recharges to other departments, including HRA, capital and supporting adults.
- 7.3. The net controllable GF budget of £8m has received growth in the 2022-2023 budget of £2.1m in recognition of the requirement to right size the emergency and temporary accommodation budgets. However, there is also a requirement for the directorate to make £2.6m of savings. The net £0.5m of savings is therefore required for a balanced budget to be achieved.
- 7.4. The forecast outturn at period 2 2022- 2023 has identified £661k of pressure. This is predominately driven from the increasing demand within the emergency and temporary accommodation service area.
- 7.5. A reserve of £1.3m was established in 2021- 2022 to carry out targeted preventative work. £0.7m has been drawn down and used to pay deposits and incentives to private landlords. It has been recognised by the Department for Levelling Up, Housing & Communities that this type of bespoke working is effective, and they have recommended that the Homelessness Prevention Grant should be used to supplement prevention work.

- 7.6. The Housing Revenue Account (HRA) budget is made up of total expenditure of £49.8m and consists of:
- £18.6m of responsive repairs and other planned maintenance costs
  - £17.6m employee costs
  - £8.7m of recharges from other departments
  - £4.9m made up of third-party payments; bad debt provision, legal fees, and other supplies and services
- 7.7. The forecast outturn at period 2 2022- 2023 has a minor £46k pressure, however, a balanced budget is forecast.
- 7.8. Increased demand and costs within responsive repairs have been identified as a potential pressure in the current year. Where mitigation in year cannot be found to meet any additional spend, a draw down from reserves will be made. The reserve forecast as at 31 March 2021 was £27.6m with the final adjustment for the 2021- 2022 year end account transactions yet to be completed.

## **8. MEDIUM TERM FINANCIAL STRATEGY 2021- 2025**

- 8.1. The MTFFS net savings target over the period 2021- 2025 totals £2.291m.
- 8.2. The savings are reliant on the successful embedding of the cultural change that is required within the housing directorate including an emphasis on prevention.
- 8.3. Monitoring of the savings and progress in achieving them form part of the monthly MTFFS assurance meetings which are chaired by the Chief Executive and the Corporate Director of Finance.

## **9. PERFORMANCE**

- 9.1. A collated set of housing directorate key performance indicators for financial year 2022- 2023 are not yet available. The Corporate Director for Housing does not, at present, have assurance that the available service and performance data is accurate. The [latest key performance indicators for the housing directorate](#) were presented to Cabinet in March 2022.
- 9.2. Improving our collection and use of service and performance information is a priority of the directorate and will be key to a number of transformation projects. The existing set of key performance indicators will be revised to ensure that they enable sufficient scrutiny from our stakeholders.
- 9.3. Enabling scrutiny from our stakeholders will require identifying sets of indicators for each of our stakeholder groups, and providing training to these groups, where necessary. The provision of key performance

indicators to residents will be co-designed with the Tenant & Leaseholder Panel and will contribute to the Council's fulfilment of its duties under the Social Housing Regulation Bill.

## **10. KEY RISKS AND MITIGATIONS**

- 10.1. Key to the transformation of the housing directorate will be improvements to risk management. The bespoke culture change plan must create an honest and open culture that ensures that housing staff across the directorate feel empowered to escalate risks upwards. Effective risk management will be key to enabling the Council to provide assurance to both the Department for Levelling Up, Housing & Communities and the Improvement & Assurance Panel.
- 10.2. The transformation of the housing directorate will create a framework for the management of risks at all levels. Effective project and programme management of the projects detailed in this report will be key to the transformation of the housing directorate and the management of risk. Key directorate-level risks are detailed.
- 10.3. Resourcing remains a key risk to the transformation of the housing directorate with regards to both operational and change-delivery staff. Whilst Housing Revenue Account funding is available to enable recruitment, the combination of a challenging labour market and difficulties attracting staff to the borough represents a risk. The bespoke culture change plan will target the Employee Value Proposition aimed at boosting employee engagement and satisfaction, thereby attracting and retaining high quality professionals to the organisation. The professionalisation of the workforce, through the provision of training and support to our staff, will also improve employee capability and retention.
- 10.4. As outlined above, the council is currently in breach of the Regulator for Social Housing's Homes Standard and Tenant Involvement & Empowerment Standard which presents a significant risk to the directorate ahead of the enforcement of the Social Housing Regulation Bill.

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**CONTACT OFFICER:** Susmita Sen, Corporate Director for Housing

**BACKGROUND DOCUMENTS:** None

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