

REPORT TO:	CABINET 25 MARCH 2019
SUBJECT:	Suburban Design Guide - Supplementary Planning Document (SPD2) - Adoption
LEAD OFFICER:	Shifa Mustafa, Executive Director of Place Heather Cheesbrough, Director of Planning and Strategic Transport
CABINET MEMBER:	Councillor Paul Scott, Cabinet Member for Environment, Transport & Regeneration (Job Share)
WARDS:	All
<p>CORPORATE PRIORITY/POLICY CONTEXT/AMBITIOUS FOR CROYDON:</p> <p>The Croydon Local Plan 2018 sets the growth and development vision and planning policies for the borough from 2016 – 2036. The Croydon Local Plan provides the planning policy basis for the borough to plan for and deliver the borough’s housing need, deliver necessary affordable housing, accommodate sustainable growth, regenerate the district centres, strengthen neighbourhood and local centres, safeguard and provide employment floor space and deliver a renewed Croydon Opportunity Area, with a residential population of up to 20,000 people, a redeveloped retail core and provision of public realm and infrastructure.</p> <p>The Suburban Design Guide - Supplementary Planning Document (SPD2) relates particularly to the following Ambitious for Croydon and Corporate Plan (2018 – 2022) outcomes:</p> <p><i>Our new Croydon Local Plan has a strong emphasis on building sustainable communities and delivering affordable homes. We will actively work to see that both are delivered</i></p> <p><i>Corporate Plan (2018 – 22) - Good, decent homes, affordable to all.</i></p>	
<p>FINANCIAL IMPACT</p> <p>SPD2 and the associated officers’ resource, including the evidence base assembly has been delivered through the Spatial Planning Service budget, supported by the Government’s Planning Delivery Fund: Design Quality bid, which allocated £24,300 to the project in 2017/18 and £25,700 in 2018/19.</p>	
<p>KEY DECISION REFERENCE NO.: 0419CAB</p> <p>This is a Key Decision as defined in the Council’s Constitution. The decision may be implemented from 13.00 hours on the expiry of 5 working days after it is made, unless the decision is referred to the Scrutiny & Overview Committee by the requisite number of Councillors.</p>	

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below.

1. RECOMMENDATION

- 1.1 Consider the comments received and the Council's responses at Appendix A to the statutory public consultation on the draft Suburban Design Guide - Supplementary Planning Document (SPD2) (Appendix B).

And:

- 1.2 Agree the Consultation Statement, including the list of comments, responses and (where applicable) amendments at Appendix A.
- 1.3 Note that the Council has undertaken a screening exercise with the statutory bodies to confirm the Suburban Design Guide - Supplementary Planning Document (SPD2) is not required to be supported by a Strategic Environmental Assessment.

Recommend Cabinet recommend to Council:

- 1.4 Adoption of the Suburban Design Guide - Supplementary Planning Document (SPD2) in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012;
- 1.5 Delegate to the Director of Planning and Strategic Transport, in consultation with the Cabinet Member for Environment, Transport & Regeneration (Job Share), the making of minor factual, editorial and image changes to the Suburban Design Guide - Supplementary Planning Document (SPD2) prior to adoption publication.

2. EXECUTIVE SUMMARY

- 2.1. Croydon is a growing borough. It is already the most populous borough in London and planning is critical to ensuring that Croydon meets its housing need over the next 20 years. The Croydon Local Plan 2018, adopted in February 2018, sets out the strategy, sites and planning policies necessary to meet these needs up to 2036.
- 2.2. Increasing the supply of homes through sustainable growth, including affordable homes, is a key element of Ambitious for Croydon, which is enshrined throughout the Croydon Local Plan 2018. In part, the sustainable growth of the suburbs will deliver this growth as encouraged and enabled by the Croydon Local Plan 2018. This will be achieved whilst protecting the borough's open space and the distinctive heritage and character, alongside the necessary infrastructure to mitigate the impact of growth.
- 2.3. 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 (1,645 per annum). As further context the emerging London Plan proposes to increase Croydon's housing target to 2,949 per annum.

- 2.4. In order to deliver a wide choice of high quality homes through good design, the National Planning Policy Framework (NPPF) (July 2018) states that 'The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. 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'.
- 2.5. In the Croydon Local Plan 2018, Policy DM10 outlines the expected modes of suburban development on windfall sites including conversion, additions, infill and plot subdivision, rear garden development and regeneration. Furthermore, Table 6.3 designates four areas of focussed intensification; areas with established infrastructure, but relatively low density and the potential to accommodate a significant increase in residential development.
- 2.6. The evolution of the suburbs is underpinned by the strategic objectives of the Croydon Local Plan 2018, which are required to fulfil Croydon's spatial vision and deliver the Local Plan's policies.
- 2.7. On adoption, SPD2 will supersede the current SPD2, providing revised guidance for residential extensions and alterations, as well as new guidance for suburban residential developments and development in areas of focussed intensification.
- 2.8. SPD2 will help steer, guide and provide the parameters and certainty for the evolution of the suburbs to the benefit of communities, stakeholders, developers and planning officers.

3. SUBURBAN DESIGN GUIDE SPD2

- 3.1. The purpose of SPD2 is not purely driven by growth and meeting housing need, but to provide guidance on how development of homes for Croydon should occur. Policy DM10.11 of the Croydon Local Plan 2018 also provides the policy that development in areas of focused intensification should be assessed against.
- 3.2. While development in the borough is managed by the policies set out in the Croydon Local Plan 2018 and London Plan, regard should be given to the SPD2 when preparing designs and planning applications, including those which are Permitted Development.
- 3.3. Once adopted, SPD2 will supersede the existing Residential Extensions and Alterations SPD2 which was produced in 2006. Since the existing SPD2 was produced, demand for housing has increased and National, London and borough planning policy has changed. With significant changes to Permitted

Development rights since 2006, which give homeowners rights to extend their homes without the need for planning permission, the old SPD2 is outdated.

- 3.4. SPD2 provides guidance for suburban residential developments and extensions and alterations to existing homes across the borough. It is a Supplementary Planning Document 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.
- 3.5. Beyond providing technical design guidance, SPD2 sets out how residential development, including extensions and alterations, in the Places across the Borough is part of a holistic strategy being driven by the Council to deliver tangible public benefits to suburban communities.
- 3.6. The guidance contained in SPD2 is broken down into three sections:
 - Suburban Residential Development
 - Areas of Focussed Intensification; and
 - Residential extensions and alterations.
- 3.7. The Croydon 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'.
- 3.8. The delivery of approximately 10,000 homes in the suburbs of Croydon will result in an evolution of the existing character of suburban streets. Increased density of homes can impact on the amenity of existing residents if not properly managed through the planning process.
- 3.9. SPD2 provides technical design guidance that seeks to both limit any negative impact on the 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.
- 3.10. SPD2 is anticipated to assist planning officers in making decisions on planning applications and will be a material consideration in assessing planning applications.

4. CONSULTATION

- 4.1 Before the formal consultation process began, the draft SPD2 underwent a process of extensive internal consultation. During the initial preparation of the draft SPD2, further broader consultation was also been undertaken with local developers and architects, Croydon's Resident Associations' (North and South), Planning Committee, Scrutiny Committee and the Greater London Authority.
- 4.2 As per the requirements for public participation of Regulation 12 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the

Council undertook a formal consultation period of six weeks, from 3 September 2018 to 12 October 2018. During this period, officers held seven (7) consultation events with the community across the borough to engage residents, businesses, developers and interested parties on the draft SPD2.

- 4.3 Consultation on the draft SPD2 was compliant with the Local Planning Regulations and Council's Statement of Community Involvement (SCI). The consultation was publicised via the following methods:
- Emails/letters were sent to persons on the LDF database (in line the with General Data Protection Regulations update), including Statutory consultees, to inform stakeholders about the consultation.
 - Croydon Council's SPD website page and *Your Croydon* website were updated to reflect the consultation period and inform persons about the consultation events and how to make a representations.
 - Copies of the draft Suburban Design Guide SPD2 were available to view at Access Croydon and at each of the Borough's libraries.
 - An advertisement in The Croydon Guardian.
 - Postcards providing the Council website address, details of the consultation events and methods for submitting representations online were available at Access Croydon, Borough libraries and consultation events.
 - Tweets from the Croydon Council Twitter feed were posted to inform readers of deadlines and events.
 - Councillors and Croydon's Resident Associations' (where in line the with General Data Protection Regulations update) were informed of the consultation period.
- 4.4 Further detail about the consultation process is available in the Consultation Statement (Attachment X).
- 4.5 As per Regulation 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Council sought representations on the draft SPD2. A total of 623 representations were received during the consultation period, covering a number of topics and issues. Detail regarding the responses received, including those that have resulted in amendments to the final SPD2 are detailed in the Consultation Statement (Attachment X).

5 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

5.1 Revenue and Capital consequences of report recommendations

	Current year	Medium Term Financial Strategy – 3 year forecast		
	2018/19 £'000	2019/2020 £'000	2020/21 £'000	2021/22 £'000
Revenue Budget available				
Expenditure	25.7	0	0	0
Income	(25.7)			
Effect of decision from report				
Expenditure	25.7	0	0	0
Income	(25.7)			
Remaining budget	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Capital Budget available	0	0	0	0
Expenditure	0	0	0	0
Effect of decision from report	0	0	0	0
Expenditure	0	0	0	0
Remaining budget	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>

5.2 The effect of the decision

SPD2 and the associated officers' resource, evidence base assembly and consultation undertaken was delivered through the Spatial Planning Service budget, supported by the Government's Planning Delivery Fund: Design Quality bid, which allocated £24,300 to the project in 2017/18 and £25,700 in 2018/19.

Risks

There are no significant risks arising directly from this report.

5.3 Future savings/efficiencies

- 5.3.1 Officer time required to advise applicants is likely to be reduced due to the provision of better guidance, and create a more efficient pre-planning application and planning application determination service.
- 5.3.2 SPD2 will contribute indirect financial savings by assisting the regeneration of the borough and the delivery of the housing targets set out in the Croydon local Plan 2018 through the setting of design guidance that will provide certainty to the community and developers and mitigate costs associated with planning appeals.

Approved by: Lisa Taylor Director of Finance Investment & Risk

6. LEGAL CONSIDERATIONS

- 6.1 The Director of Law and Governance comments that there needs to be public participation before a local planning authority can adopt a Supplementary Planning Document. Council Officers are satisfied that the Consultation undertaken in September-October 2018 was in accordance with the requirements for public participation detailed in the Town and Country Planning (Local Planning) (England) Regulations 2012, particularly regulations 12 and 35. Adoption of the Suburban Design Guide - Supplementary Planning Document (SPD2) will be in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012

Approved by: Sean Murphy, Director of Law and Governance & Deputy Monitoring Officer

7. HUMAN RESOURCES IMPACT

- 7.1 There are no human resources implications arising from this report.

Approved by: Jennifer Sankar, Head of HR Place on behalf of Sue Moorman Director of HR

8. EQUALITIES IMPACT

- 8.1 The Croydon Local Plan: Strategic Policies – Partial Review and the Croydon Local Plan: Detailed Policies and Proposals (The Croydon Local Plan 2018) was subject to an Equality Analysis to ascertain the Plans' potential impact on groups that share a protected characteristic and identified that a full Equality Analysis was necessary for the Proposed Submission stage. The full Equality Analysis established that there was no potential for discrimination, harassment or victimisation and that the Croydon Local Plan includes all appropriate actions to advance equality and foster good relations between all groups. The appropriate actions to address potential impacts on groups with a protected characteristic include:
- The Croydon Monitoring Report, which is published annually, to assess the effectiveness of the Croydon Local Plan 2018.
 - Monitoring of supply and demand for sheltered, residential care, and extra care housing.
- 8.2 The Equality Analysis undertaken for the Croydon Local Plan: Strategic Policies – Partial Review and the Croydon Local Plan: Detailed Policies and Proposal sufficiently and appropriately covers the content and implications of SPD2.
- 8.3 The Equality Analysis for the Croydon Local Plan: Strategic Policies – Partial Review and the Croydon Local Plan: Detailed Policies and Proposal is a background document.
- 8.4 The proposed change will help the council meet its equality objective 'To increase the support offered to people who find themselves in a position where

they are accepted as homeless especially those from BME backgrounds and women’.

Approved by Yvonne Okiyo, Equalities Manager

9. ENVIRONMENTAL IMPACT

- 9.1 A Sustainability Appraisal (SA) was prepared for the Croydon Local Plan 2018. Given that SPD2 will provide supplementary guidance to the policies within the Local Plan, it is determined that the Local Plans’ SA provides relevant assessment and therefore negates the need for a SA/Strategic Environmental Assessment (SEA).
- 9.2 The Environmental Agency, Natural England and Historic England were consulted on the need for a SA / SEA of the SPD2. All three statutory consultees confirmed that the production and adoption of SPD2 is unlikely to have any significant environmental impacts and therefore a full SA/SEA is not required.

10. CRIME AND DISORDER REDUCTION IMPACT

- 10.1 There are no crime and disorder reduction impacts arising from the recommendations of this report.

11. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 11.1 To provide design guidance for suburban residential developments and extensions and alterations to existing homes across the borough, while assisting in the delivery of the borough’s housing targets and providing clarity to communities, stakeholders, developers and planning officers.

12. OPTIONS CONSIDERED AND REJECTED

- 12.1 The other option would be to not adopt SPD2. This would mean that there would be no up to date design guidance for the borough, which would lead to planning applications being determined on the basis of existing planning policy and guidance that is not considered to be sufficiently detailed or area-specific and would create a tension with the Council’s obligation to meet the housing targets in the Croydon Local Plan in a sustainable and managed way. Such an approach could also lead to additional planning appeals.

CONTACT OFFICER: Steve Dennington, Head of Spatial Planning
(ext 64973)

APPENDICES: Appendix A: SPD2 Consultation Statement

Appendix B: SPD2 Suburban Design Guide

BACKGROUND DOCUMENTS: Equality Analysis