

# **Consultation Statement: Suburban Design Guide Supplementary Planning Document**

Consultation statement prepared in accordance with Regulation 12 of the Town and Country Planning (Local Development) (England) Regulations 2012.

## **1. Name of Supplementary Planning Document**

Suburban Design Guide (SPD2)

## **2. Purpose of SPD**

2.1 The Suburban Design Guide Supplementary Planning Document (SPD2) provides guidance for suburban residential developments, development in Areas of Focused Intensification and extensions and alterations to existing homes across the borough. It is a Supplementary Planning Document to the Croydon Local Plan 2018 and is intended to assist in the delivery of around 10,000 homes in these locations of the boroughs housing target of 32,890 new homes by 2036 as set out in Policy SP2.2 of the Local Plan. The document relates to Policy DM10: Design and Character of the Local Plan, along with other relevant policies, and 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 enhance places and bring benefits to communities.

## **3. Persons/groups/bodies consulted in connection with preparation of SPD**

3.1 Public consultation has occurred on the draft SPD in line with the Council's Statement of Community Involvement (SCI). Croydon Council went beyond the requirements of the SCI as detailed below and has worked closely with the local community and local stakeholders in the area to produce the draft Suburban Design Guide.

## **4. How were people consulted?**

4.1 Prior to formal public consultation, engagement events including meetings and workshops were held with identified stakeholders from across the Borough, internally within the Council and external bodies including:

- Residents Associations, during their regular forums with the Planning Department.
- A local developer/agent meeting was run to discuss issues and options, followed by a second meeting where developers/agents presented relevant development schemes that had been granted permission or recently built.
- Informal workshop with local agents, London-wide professionals and representatives from the Greater London Authority to test how such guidance may be applied.
- Informal Place Review Panel workshop considering issues and options, and to test how such guidance may be applied.

- Recurring Local Development Framework Board meetings throughout the drafting, consultation, amendment and adoption process.
- Scrutiny Committee in January 2018.

4.2 In addition, before the formal consultation process, the Suburban Design Guide SPD2 went through a process of internal consultation and testing with the Spatial Planning, Development Management, Transport and Regeneration Services.

4.3 The formal consultation process for the draft Suburban Design Guide SPD2 adhered to the Council's adopted Statement of Community Involvement (2012) and also the statutory requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012. Formal Consultation took place between 3 September and 15 October 2018. Those consulted (as detailed in Paragraph 4.4) were informed of how they may access the document, the date and location of consultation events, along with the date by which representations must be made and where they should be sent.

### **Consultation overview**

4.4 Publicity for consultation was undertaken via the following activities:

- Emails/letters were sent to persons on the Local Development Framework database (in line with General Data Protection Regulations<sup>1</sup>), including Statutory Consultees, to inform stakeholders about the consultation process.
- 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 representation.
- Physical 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 as a statutory notice.
- 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 local Residents Associations (where in line with the General Data Protection Regulation) were informed of the consultation period.

4.5 Consultation comprised of the following:

- Hosted on the SPD web page, an electronic version of the draft Suburban Design Guide SPD2 was made available for download from the Council's website.
- Hard copies of the draft Suburban Design Guide SPD2 were available in Access Croydon and all libraries across the Borough.
- A narrated animation depicting the growth of Croydon and the guidance outlined in the document.
- Seven public consultation events on the draft Suburban Design Guide SPD2 were held across the borough during the consultation period and staffed by the SPD2 team and members of the Council's Planning Department. Consultation material at events included:
  - hard copies of the document;

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<sup>1</sup> General Data Protection Regulation (GDPR) came into force on 25<sup>th</sup> May 2018, ahead of formal consultation on SPD2. Contacts on the LDF database prior to the GDPR were contacted and required to respond to confirm they wish to stay on the database, following which those who did not respond were removed from the LDF database.

- poster boards with components of the document displayed including the development of typical streets and plots, as well as key guidance;
  - the animation screened on loop
  - an interactive website for the public to test navigation and display of the draft SPD2 in an online format;
  - table drawing boards with typical street patterns/housing typologies for attendees to demonstrate typical issues, concerns or suggestions for suburban development;
  - 3D wooden models of development patterns (detached homes, semi-detached homes and terraced homes) with removable and interchangeable houses which, when repositioned, provided examples of how development and evolution may occur;
  - Two ‘windows on wheels’ to portray overlooking distance dimensions as mentioned in the document; and
  - Council project staff on hand to answer questions regarding the document or development linked to the guidance in the draft SPD2.
- Representation forms were provided at events for consultees to leave their comments and were also available in Access Croydon, each of the Borough’s libraries and for download from the website. Representations were also recorded if they were provided via email to the LDF inbox, mailed to Croydon Council’s Spatial Planning team or asked to be recorded at consultation events.

#### **4.6 Consultation Event Attendees**

Total number of attendees: 242 people

Tuesday 18 September, 4pm – 8pm, Addington Community Centre: 17 people

Thursday 20 September, 4pm – 8pm, Upper Norwood Library Hub: 5 people

Tuesday 25 September, 4pm – 8pm, Kenley Hall: 110 people

Saturday 29 September, 10am – 2pm, Purley Library: 23 people

Tuesday 2 October, 4pm – 8pm, Christchurch Methodist Hall Addiscombe: 14 people

Thursday 4 October, 4pm – 8pm, Selsdon Community Centre for the retired: 37 people

Tuesday 9 October, 4pm – 8pm, Shirley Community Centre: 36 people

#### **4.7 Animation Views**

Online: 885

Offline: At consultation events, approximately 100 views

#### **4.8 Representations received**

623

#### **4.9 Statutory Consultees**

As part of the consultation, Statutory consultees and key stakeholders were invited to make a representation on the draft SPD2. These included:

- Environment Agency
- Highways England
- Historic Buildings and Monuments Commission for England (Historic England)
- Natural England
- Sport England
- Greater London Authority (GLA)
- Mayor of London
- Transport for London (TfL)

Comments received from Statutory Consultees have been detailed in Section 6 of this statement, along with Council’s response

Other local authorities, as listed below, were also consulted:

- Surrey County Council
- Lambeth
- Wandsworth
- Southwark
- Bromley
- Tandridge
- Reigate and Banstead
- Sutton
- Merton

## **5. Comments of support**

5.1 A number of representations were received expressing support for the draft Suburban Design Guide SPD. These included:

- Support for the Council in recognising that the burden of regeneration and the requirement for housing needs to be shared across the borough;
- Praise for the documents guidance on managing evolution, thereby limiting negative impacts on existing residents and bringing benefits to the community by enhancing character through good quality design;
- Welcoming the guidance that does not support overbearing development that would negatively impact neighbouring properties and the streetscene;
- Welcoming the intent to make more efficient use of existing infrastructure and improve public spaces and community facilities in the Forestdale Intensification Area;
- Support for the guidance that seeks to avoid the use of materials that weather poorly;
- Support for the use of bicycles throughout the borough where additional cycle routes are provided;
- Support for the guidance on car parking including permit-free developments through the use of S106 agreements to restrict residents from applying for on-street parking permits and the provision of disabled persons parking spaces, car club spaces and active vehicle charging facilities;
- Praise for the quality of the written document and accompanying visuals;
- Commendation for the progressive improvement in the quality of consultation, including the assistance provided by staff and quality of material on display.

## **6. Comments received from Statutory Consultees and stakeholders**

### 6.1 Environment Agency

The Environment Agency (EA) provided the following comments:

- *Noted no specific or detailed comments relating to land contamination or flood risk in light of the text in the SPD.*
- *Recommended that any future site allocations on land with previous use will need to address potential contamination issues by adequate investigation and risk assessment.*

- *Where relevant, they would provide comments on any specific site at application stage.*
- *Noted Section 2.36 refers to the use of SuDS and that any new proposals should ensure that any sustainable drainage design will achieve appropriate protection of groundwater.*
- *Noted that Brighton Road and Kenley AFIs are in Flood Zone 3 and have been subject to historic flooding emphasising the need to steer all new development away from these locations, and any areas at high risk of Surface Water Flooding.*

LBC notes the recommendation with regards to site allocation and potential contamination. This will be considered in any future site allocations (nb. this is not within the scope of an SPD). LBC appreciate comments from EA on any specific site at application stage.

LBC recognise the comment with regards to SuDS and protection of groundwater. This is a detailed technical design issue and would be addressed by consultants working on a development application.

In relation to flooding in the Brighton Road and Kenley Areas of Focused Intensification, the guidance has been revised to provide reference to Policy DM25 and Table 8.1 of the Croydon Local Plan which require sequential and exception tests, thus steering development away from these locations.

## 6.2 Historic England (HE)

Historic England (HE) provided the following comments:

- *Welcomes the Council's intention to produce design guidance for suburban areas and considers the guidance timely and well detailed.*
- *Supports the principal of planning for increased densities through sustainable development methodologies which reflect and demonstrate the positive aspects of local character.*
- *Supports the guidance on heritage and the proportionate approach to significance where heritage assets are affected in paragraphs 1.4.12 to 1.4.17.*
- *Suggests that the guidance could provide a stronger framework for successful design, suggesting that a number of illustrative examples in the document appear at odds with the guidance and may result in uncharacteristic and unpopular development (such as 2.4 and 2.11). HE suggests that these would benefit from better illustration and qualification or revision.*
- *Provided useful built examples for consideration in developing the proposed guidance.*
- *Supports the case study illustrations in the document as innovative ways to increase density.*
- *Suggests that it may be helpful to state that where proposals affect heritage assets that the additional policies set out in the National Planning Policy Framework, Local Plan and associated national and local guidance documents will be applied.*
- *Recommends clarifying where the illustrative examples are likely to be unsuitable for historic suburbs or, alternatively, consider including a section illustrating schemes in historic areas which have been successfully delivered.*
- *Recommends setting out the design process that underpinned those successful case studies through a flow chart/process map which shows the steps for design development. This may assist in developing a design tool-kit to help potential developers test designs and bring forward successful schemes.*

- *Noted the need to provide usable green spaces where people feel they have ownership and help to maintain.*

LBC appreciates the positive and supportive feedback from Historic England.

With regards to the comment on Section 2.4, it has been important to incorporate this so that smaller sites can achieve a scale that provides higher densities and affordable housing. This section has now been linked to Section 2.15 and the other relevant sections within the guide are written to limit uncharacteristic development (Refer to Paragraph 7.4.5 of this statement). With regards to the comment on Section 2.11, the 45° rule is commonly applied by the Local Planning Authority and is largely accepted as an industry standard. Figures 2.11d-2.11s demonstrate how an approach to form can limit impact.

LBC has reviewed the examples provided and subsequently included Worland Gardens within the guide.

In response to HE's recommendation that it should be clarified where examples are unlikely to be suitable for historic suburbs, or include a separate section for historic areas, LBC would like to note that the Council has a Conservation Area General Guidance (CAGG) document and specific Conservation Area Appraisal and Management Plans (CAAMP) for each Conservation Area. SPD2 makes reference to these and notes these take priority over the SPD2; as such it was deemed this would be an unreasonable addition that might compromise the authority of the CAGG or CAAMPs.

In response to setting out the design process in a flow chart, this risks constraining architects/designers and would fail to recognise that a good design process is not linear and should be iterative. The design guide is in itself a toolkit providing a series of rules to help shape designs as they progress.

LBC have strengthened the guidance on landscaping, particularly shared amenity space, to facilitate ownership and maintenance of green spaces.

### 6.3 Natural England

Natural England (NE) provided the following comments:

- *Noted that the SPD is unlikely to have major impacts on the natural environment and therefore did not provide specific comments.*
- *Advised incorporating features which are beneficial to wildlife within the guidance for suburban development.*
- *Noted the opportunity that landscaping presents to enhance the character, sustainability, amenity and local distinctiveness of the surrounding natural and built environment. NE recommended this could be considered to ensure new development makes a positive to the local area.*
- *Noted that SPDs only require a Strategic Environmental Assessment in exceptional circumstances and did not note this to be the case.*

LBC have now incorporated guidance on a 'wildlife area' within landscaping proposals associated with development to provide wildlife corridors (refer to Paragraph 7.4.46 of this statement). LBC have strengthened the wording in relation to landscaping to emphasise its importance and how new development should contribute to this (refer to Paragraphs 7.4.45-7.4.48 of this statement).

LBC notes that NE were consulted at an earlier stage to confirm whether a Strategic

Environmental Assessment (SEA) would be required. The response from NE was that an SEA was not necessary.

#### 6.4 Mayor of London / Greater London Authority (GLA)

The Mayor of London / GLA provided the following comments:

- *Noted that the SPD is an innovative planning document to encourage the delivery of small housing sites.*
- *Strongly welcomes the aims and objectives of the SPD, being broadly in line with the emerging London Plan as set out in following comments.*
- *Noted the housing targets for LBC within the draft new London Plan and that a significant number (1,511 per annum) should be delivered from small sites in line with draft new London Plan policy H2 Small Sites.*
- *Noted that policy H2 in the draft new London Plan sets out a presumption in favour of sustainable development for certain types of small residential developments and that boroughs should prepare area-wide design codes to proactively encourage increased housing provision, good design and higher residential densities. SPD2 broadly performs this function.*
- *Noted the areas SPD2 applies to could be extended to reflect those outlined in draft London Plan policy H2D.*
- *Noted that policy H2 in the draft new London Plan applies to residential developments between 1 and 25 homes and Croydon should increase its threshold to 25 units to be consistent.*

LBC appreciate the comments of support from the GLA. LBC have increased the threshold to 25 homes and notes that the guidance applies across the borough (and includes additional guidance for the Areas of Focussed Intensification) with the exception of the Metropolitan Centre and District Centres. These centres are excluded as they are subject to place specific policies within the Croydon Local Plan and are expected to accommodate development of a scale greater than allowed for in the Suburban Design Guide SPD, including on small sites.

#### 6.5 Transport for London

Transport for London (TfL) provided the following comments:

- *Noted that the document puts forward proposals that align well with the Healthy Streets approach, the Mayor's Transport Strategy (MTS) and Policies D7 (Public Realm), GG3 (Creating a Healthy City) and T2 (Healthy Streets) of the draft London Plan (2017).*
- *Support for the principles in the sustainable transport section.*
- *Strongly supported the guidance providing on parking.*
- *Suggested the guide should explicitly refer to the Healthy Streets principles.*
- *Suggested the guide should emphasise requirement of the draft new London Plan for new development to be car free in metropolitan and major town centres and all areas of PTAL 5-6.*

- *Support for parking spaces being leased rather than sold, but recommended leases should be short enough to allow sufficient flexibility in parking allocation to reflect changing circumstances.*
- *Support for the use of permit-free developments.*
- *Potential to provide a stronger commitment to introducing new CPZs.*
- *Generally supported the guidance on parking requirements, including the provision of charging facilities, noting the need for 20% of parking spaces to have active charging facilities, with passive provision for all remaining spaces.*
- *Noted that the text reading ‘Car Park Design & Management Plan’ should be amended to ‘Parking Design and Management Plan’.*
- *Suggested the need to emphasise the flexible use of parking depending on changes in demand and behaviour and local context.*
- *Suggested strengthening of guidance on landscaping to screen parking.*
- *Suggested a separate section on cycle parking to emphasise the importance of active travel.*
- *Noted clarification is needed to state cycle storage will need to be in addition to general storage area and not in a combined bike and general storage area. Additionally, all access routes to cycle storage should be accessible and easily fit a bicycle that does not need to be folded. Reference should also be made for the need to accommodate visitor cycle parking that should be considered within public realm design.*
- *Noted that all new driveways to developments on the TLRN should be consulted and made in agreement with TfL. Likewise for those that access onto a tram route, with particular consideration to glare and vegetation.*
- *Support for creating connections through suburban blocks, but noted the need to prioritise pedestrians and minimise vehicular access.*
- *Noted the need to better emphasise the benefits for Areas of Focussed Intensification, including better facilities for walking, cycling and public transport access, safer roads and public realm improvements.*
- *Support the use of parking surveys and where necessary/relevant the requirement for the developer to enter into a legal agreement restricting future occupiers from applying for an on street parking permit.*

LBC appreciate the comments of support that recognise the guide reflects the current London policies, strategies and guidance; LBC have now included specific reference to the Healthy Streets principles within the guide (refer to paragraph 7.4.11 of this statement); the guide refers to the London Plan standards on charging facilities associated with parking spaces rather than setting out the specific requirements in the guide itself. This ensures the guide has longevity as London Plan standards may evolve on this subject.

In response to TfL’s comments on areas of the highest PTALs, LBC notes that the guidance does not refer to metropolitan or major town centres.

LBC noted the comment on parking space leases being short, however considered this to be inappropriate to quantify in an SPD focussed on residential design. A stronger commitment to future CPZs has been made, dependent on consultation with communities (refer to

paragraphs 7.4.12 and 7.4.40 of this statement). An amendment has also been made to 'Parking Design and Management Plan' (refer to paragraph 7.4.7 of this statement).

The guidance on parking in Paragraph 2.30.10 has been amended to emphasise the importance of flexible use of parking spaces to accommodate alternative uses in light of potential future change in demands (refer to paragraph 7.4.42 of this statement). Further detail on screening to parking areas has been provided in Paragraph 2.30.10 (refer to paragraph 7.4.43 of this statement).

LBC recognise the importance of cycling as part of the MTS, however in the context of the SPD are of the opinion that proportionate guidance on cycle storage has been provided. However the guidance provided has been strengthened based on the recommendations from TfL (refer to paragraphs 2.31.2 and 2.31.3 of the SPD).

Additional guidance for developments that would accessing onto TLRN or Tram Route has been provided in Paragraph 2.29.9 which notes the need to consult TfL in these instances (refer to paragraph 7.4.38 of this statement). Additional guidance and amendments have also been made to 2.29.1 and 2.29.13 to strengthen the prioritisation of pedestrians over vehicular movement (refer to paragraph 7.4.39 of this statement).

Revisions to Chapter 3 have been made to highlight the potential benefits and opportunities for the Areas of Focussed Intensification in terms of better facilities in relation to walking, cycling and public realm improvements (refer to paragraph 7.5.2 of this statement).

## 6.6 Highways England

Highways England responded to consultation noting they had no comments on the document.

## 6.7 Sport England

No response was received from Sport England.

## **7. Issues Raised & Responses**

7.1 The following paragraphs provide a summary of the main issues raised and how these have been addressed in the SPD. The comments received have been separated into sections to reflect the chapters of the SPD, and those that have resulted in amendments and those that have not. Where representations made comments that were similar or identical to others received these have been grouped to allow a consolidated response. Alongside comments received, the tables below list how these have been addressed in the SPD, and where relevant additional commentary from the council to respond to these issues. Where an amendment to the document has been made this is denoted by red italics.

### **7.2 General SPD2 comments**

Comments and responses are divided into two sections below. The first section covers those which result in amendments and the second section covers those that do not result in amendments.

<b><u>General Comments: Responses that result in amendments</u></b>		
	<b>Comments received</b>	<b>Council response</b>
7.2.1	Representations requested further clarification regarding the provision of physical and social infrastructure to support suburban evolution as advocated within the SPD. These representations noted the need to plan for the needed infrastructure alongside the planned increase of housing delivery.	It should be noted that SPD2 is a residential design guide for the suburbs concerned primarily with the design of buildings and their surrounding sites, rather than an infrastructure plan. Notwithstanding this, the Council has planned for the increased number of housing across all parts of the borough within Local Plan policies and the Infrastructure Delivery Plan. This is reflected in the following amendment.  <i>Amendment to Paragraph 1.1.3: '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.'</i>
7.2.2	Representations requested further clarification on the areas in the borough and the types of schemes to which the guidance applies, particularly as the draft new London Plan identifies 'small sites' as being any site which delivers under 25 homes.	The table within Section 1.2 clearly identifies which chapters of the SPD are relevant. The SPD is applicable to suburban residential developments on smaller sites within Croydon and does not apply to larger development.  <i>Amendment to Section 1.2 Table: Updated to '25 homes', reflecting the draft London Plan.</i>
7.2.3	Representations suggested that it should be made clear that a supplementary planning document	<i>Amendment to include Additional Paragraph 1.2.6:</i>

	<p>does not undergo an independent examination and therefore it does not carry the same weight in determining planning applications as policies in the Local Plan.</p>	<p><i>'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.'</i></p>
7.2.4	<p>Representations suggested that development on windfall sites is contradictory to the NPPF which states that development in rear gardens should be resisted.</p>	<p>The Local Plan makes provision for delivery of homes on windfall sites and underwent examination by the Planning Inspector to ensure it is sound and in line with the NPPF. Further clarification has been provided in the following amendment.</p> <p><i>Amendment to Paragraph 1.2.7: '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 found sound at the Croydon Local Plan examination.'</i></p>
7.2.5	<p>Representations suggested that the character of an area is determined by the setting (suburban/urban/central), the density and PTAL rating. These representations raised concerns that these parameters are not specified in the document and it ignores guidance in the London Plan Density Matrix and Paragraph 122 of the NPPF.</p>	<p>Table 6.4 of the Croydon Local Plan sets out the policy position in relation to character of the Places of Croydon, in reference to the Borough Character Appraisal. This was examined and found sound by the Planning Inspector as part of the Local Plan process. Further clarification within SPD2 has been provided with the amendment below.</p> <p><i>Amendment to Paragraph 1.2.8: '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).'</i></p>
7.2.6	<p>Representations noted that the document fails to provide a mechanism for measuring the cumulative impacts of development, which is currently not assessed in the decision making process of applications.</p>	<p>The Council recognise that this is of concern to many residents. It is noted that measuring the cumulative impact of development remains challenging as the Council have limited control over if and when an approved development will be built out. To provide some control over potential cumulative impacts, an amendment is proposed to the document.</p>

		<p><i>Amendment to include additional Paragraph 1.4.12:</i>  <i>‘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.’</i></p>
<p>7.2.7</p>	<p>Representations suggested the document fails to adequately address environmental impacts, including flooding and biodiversity, as a result of the development advocated within the guidance. This is particularly in light of the replacement of unsurfaced land with hard surfacing, and the resulting water run-off.</p>	<p><i>Amendment to include additional paragraph 1.4.25:</i>  <i>‘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.’</i></p> <p><i>Amendment to include additional Bullet 5 in Paragraph 2.20.4: ‘Not located in an area of groundwater flooding.’</i></p> <p>The Council recognise the increase of water run-off as a result of development and have included a section on Sustainable Urban Drainage Systems (Section 2.36). Similarly the guidance on Biodiversity (Section 2.33) has been strengthened in response to consultation - refer to paragraph 7.4.46 of this statement for further amendments relating to biodiversity.</p>
<p>7.2.8</p>	<p>Representations noted limited guidance regarding road safety when numerous planning applications are approved without demonstration of road safety.</p>	<p>It should be note that SPD2 is a residential design guide for the suburbs concerned primarily with the design of buildings and their surrounding sites, rather than a road safety or transport improvement document. There are a number of existing references to road safety within the document (refer to paragraphs 2.29.10, 2.29.11, 2.29.12, 3.2.6, 3.4.4 and 4.29 within the SPD).</p>

		<p><i>Amendment to include additional paragraph 2.29.1: '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.'</i></p> <p>Further amendments have been made in relation to the Areas of Focussed Intensification, please refer to paragraphs 7.5.3 and 7.5.7 of this statement.</p>
<b><u>General Comments: Responses that do not result in amendments</u></b>		
	<b>Comments received</b>	<b>Council response</b>
7.2.9	Representations expressed concerns that the document is subjective, rather than providing clarity on policies in the Croydon Local Plan 2018, which allows various interpretations by different users.	The Suburban Design Guide SPD2 is supplementary planning guidance, enlarging on planning policy but it cannot be overly prescriptive as it seeks to guide development applications, whilst allowing flexibility for applicants to respond to the particularities of a development site. It will be used to help determine applications as part of a balanced decision when assessing proposals against the Local Plan and other relevant policy & guidance as a whole.
7.2.10	Representations noted that the document does not provide an overall vision or plan of what development may be acceptable overall in a given area.	The borough wide vision is provided in the Local Plan and, as it required, the SPD provides borough-wide design guidance for suburban residential development, it is not possible or practicable to provide visions or plans for all areas across the borough. It does however provide further detail for the Areas of Focussed Intensification.
7.2.11	Representations noted that a number of examples and case studies are not built which makes it difficult to determine whether they are positive examples; they suggested it would be helpful to identify how the examples meet the guidance provided.	It is recognised that built schemes provide better references, however it should be noted that development applications are made based on drawn and written information, and as such drawn schemes can inform future schemes. The schemes selected present a range of positive attributes; a lengthy appraisal of each case study would make the guide unreasonably cumbersome and where possible the planning application number has been provided so readers can acquire further information if desired.

7.2.12	Representations suggest that the document should contain a list of requirements for applicants and information relating to making a planning application.	SPD2 is a design guidance document for suburban residential development and is not written to contain information about processes and procedures relating to planning applications which are subject to different regulations and may change. For this reason the SPD refers the reader to information about the requirements for making a planning application which can be found on the Council's website ( <a href="https://www.croydon.gov.uk/planningandregeneration/make-application/validation-checklist">https://www.croydon.gov.uk/planningandregeneration/make-application/validation-checklist</a> ).
7.2.13	Representations noted that the document doesn't recognise how design standards can affect the viability of a scheme.	SPD2 provides guidance that seeks to enable the delivery of good value through effective building design. It generally seeks to afford development opportunity, but this must go hand-in-hand with high quality design as required by planning policy.
7.2.14	Representations noted concerns that the type of development advocated by SPD2 would impact the visual appearance of an area.	The type of development guided by SPD2 is supported by policies within the Local Plan. The guidance within SPD2 seeks to ensure that where change to the appearance of an area is managed and positive. This underpins the design guidance throughout SPD2.
7.2.15	Representations noted concerns that the type of development advocated by SPD2 would have impact on neighbouring properties.	The type of development guided by SPD2 is supported by policies within the Local Plan. The guidance within SPD2 seeks to ensure any impact on neighbouring properties is mitigated wherever reasonable. This underpins the design guidance throughout the SPD.
7.2.16	Representations expressed concern over the deliverability of proposals in the document, particularly in Areas of Focused Intensification, and whether they represent the Council's intentions for compulsory purchase orders.	SPD2 provides design guidance only to help shape future residential development but is not in itself a development proposal. None of the proposals within SPD2 represent an intent for compulsory purchase by the Council.
7.2.17	Representations noted concerns the Council has failed to demonstrate how increased housing densities will enhance places and bring benefits to communities.	It should be noted the SPD is a design guide focussed on housing, and it sets out the potential benefits that increased densities may bring to communities. Local Plan policies make provision for delivering these benefits, such as infrastructure (refer to paragraph 7.2.1 of this statement). The Council's Spatial Planning Service work closely with the Council's Regeneration Service to deliver community-focussed projects that help to realise these benefits, such as the South

		Norwood Community Plan and Kenley Community Plan.
7.2.18	Representations expressed concerns that development of small sites is only economically beneficial to developers. These developments negatively impact neighbouring property values and are often too costly for local residents to purchase.	The private economic outcomes of a development are not a planning matter, except where concerning the provision of affordable homes. Where a development is a major scheme they are required to provide affordable housing in line with Local Plan policy SP2.
7.2.19	Representations expressed concerns that the redevelopment and replacement of single dwelling houses and family homes with blocks of flats significantly affects the character of an area.	The principle of the development addressed by SPD2 is supported by the Croydon Local Plan. SPD2 provides a definition for character in Section 2.7 and elaborates this is not tied to type of dwelling, and provides guidance for how character should be responded to. It should however be noted that the Local Plan Policy DM1.2 prevents the loss of 3 bedroom homes and provides strategic policies (SP2.7) and detailed policies (DM1) to ensure sufficient provision of family sized homes within new developments. This includes flats where they provide 3 or more bedrooms.
7.2.20	Representations noted concerns that the form of development advocated by SPD2 will result in piecemeal development.	The principle of the development addressed by SPD2 is supported by the Croydon Local Plan. The guidance within SPD2 has been written to ensure the suburbs evolve positively and collectively through individual developments as they come forward.
7.2.21	A number of representations raised concerns that there is limited protection for heritage assets, including those in a poor condition, and that conservation areas will have little protection.	Section 1.4 of SPD2 provides guidance on how to approach suburban residential development in the context of heritage assets. This section clearly refers to and prioritises the guidance documents the Council provides for Conservation Areas. The Council has an internal Heritage at Risk register to monitor buildings at risk and where possible to work with land owners to develop plans for their repair and safeguarding as necessary. Any heritage assets in serious disrepair can be reported to the Council's Conservation Officer.

7.2.22	<p>Representations expressed concern about the cumulative impacts on the road network, particularly from small, incremental changes, including that the SPD:</p> <ul style="list-style-type: none"> <li>• does not reflect the strain additional developments will have on the road network;</li> <li>• should include methods to ensure that the road network is expanded and improved to provide the capacity needed;</li> <li>• fails to identify how pollution, as a result of increased traffic, will be managed to limit impacts on health.</li> </ul>	<p>The SPD is primarily design guidance for residential development and is not an infrastructure or transport document. The Croydon Local Plan and Infrastructure Delivery Plan, along with the London Plan, provide policies and proposals to ensure new development is sustainable and seeks to promote reduced private vehicle use, reducing congestions and pollution, in line with the London-wide Mayor's Transport Strategy. These plans account for increased transport demands as a result of development. Additionally each development application is assessed both individually and cumulatively - often through a transport statement or assessment and the Council's Strategic Transport team consider the impacts of the development on the highways network, local public transport network and where appropriate require contributions, mitigation or changes from the developer.</p>
7.2.23	<p>Representations suggested there should be greater recognition of the value of and the need to preserve and improve green, open space and private gardens.</p>	<p>SPD2 provides detail for the design of private amenity spaces, including gardens. It does recognise the importance of landscaping and biodiversity in the guidance contained in Sections 2.32-2.36. These sections have been strengthened following consultation, please refer to paragraphs 7.4.45 – 7.4.48 in this statement.</p> <p>In broader terms, the provision of homes on windfall sites allows for the protection of green, open spaces, such as Metropolitan Green Belt and local green spaces (including parks), from residential developments which may be put at risk if the Council were to fail to demonstrate a 5-year housing supply.</p> <p>Furthermore, Metropolitan Green Belt and Metropolitan Open Land are afforded the highest policy protection to protect and safeguard the Borough's green space.</p>
7.2.24	<p>Representations noted that environmental issues such as noise and dust from development are not addressed in the document.</p>	<p>SPD2 provides detail on design policies in the Local Plan for suburban development. There are specific environmental policies in the Local Plan and where relevant guidance supporting guidance that would be considered for these issues so this is not in SPD2.</p>

### 7.3 Chapter 1

Comments received and responses are divided into two sections below. The first section covers those which result in amendments and the second section covers those that do not result in amendments.

<b>Chapter 1: Responses that result in amendments</b>		
	<b>Comments received</b>	<b>Council response</b>
7.3.1	Representations expressed concern that paragraph 1.2.6 conflicts with 1.2.7 and that gradual change cannot be achieved whilst meeting housing targets, and that the deliverability of housing targets in line with managed change does not account for market forces. There is a need to be clearer on the rate of change and this could include the understood figure to equate to 1 new home for every 5 that exist.	<p>The expected modes of suburban intensification outlined in Paragraph 1.2.7 (as per Policy DM10 of the Local Plan) indicate how the housing targets can be met in a managed way through the high-quality design of proposals, this is expanded upon throughout the guide. The Local Plan evidence base accounts for changes in the market to assess the deliverability of housing, whereas SPD2 is a design guide that ensures the design of individual developments support the creation of sustainable communities and manages change on individual sites that collectively contributes to a wider area; this is relevant regardless of market forces. The rate of change and impact of market forces has been clarified in the following amendments.</p> <p><i>Amendment to paragraph 1.2.7: '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.'</i></p> <p><i>Amendment to guidance paragraph 1.3.1: '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.'</i></p>
7.3.2	Representations suggested greater emphasis is needed to encourage	SPD2 cannot require publication of consultation with neighbours as this is a

	<p>developers to engage with neighbours. Suggests that there should be a requirement for applicants to publish the consultation had with neighbouring properties/landowners.</p>	<p>matter for the validation checklist that can be found on the Council’s website (<a href="https://www.croydon.gov.uk/planningandregeneration/make-application/validation-checklist">https://www.croydon.gov.uk/planningandregeneration/make-application/validation-checklist</a>). The amendment below has been made to the SPD.</p> <p><i>Amendment to paragraph 1.4.28: ‘to properly consider how neighbouring amenity may be affected... Responding to neighbours’ concerns in a meaningful manner can help to develop an acceptable proposal.’</i></p>
7.3.3	<p>Representations noted that the intent of this guide should be clear, and noted that Figure 1.3d advocated the creation of new suburban streets.</p>	<p>The scope and applicability of the guide is set out in Section 1.2. As the guide covers developments of up to 25 homes, the developments on larger sites delivering close to this maximum, may result in the creation of new streets, as illustrated in Figure 1.3d.</p> <p><i>Amendment to caption for 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.’</i></p>

### **Chapter 1: Responses that do not result in amendments**

	<b>Comments received</b>	<b>Council response</b>
7.3.4	<p>Representations noted concerns that Figures 1.3a, 1.3b and 1.3c detail the evolution of the different suburban scenarios but are subjective and open to interpretation. It was commented they may be more helpful if they were 3D.</p>	<p>The figures and illustrations in SPD2 are indicative only and cannot capture all development scenarios. The detailed guidance throughout the document elaborates on the specific issues that relate to suburban intensification and design in a number of common contexts, including 3D visuals. The document is also supported by the animation which describes the process of evolution in a more visually accessible manner.</p>
7.3.5	<p>Representations notes that the design objectives underpinning the draft guidance (Paragraph 1.3.2) are admirable, however suggestions were raised that the guide should explicitly demonstrate how each of these objectives are to be achieved.</p>	<p>The SPD elaborates on and explains in further detail throughout the document how these objectives can be achieved in different circumstances. For ease of use, the document is established in chapters and sections that reflect the built environment contexts where suburban development may occur. The detailed guidance contained throughout SPD2 is referable to a single/multiple overarching objectives within Paragraph 1.3.2.</p>

## 7.4 Chapter 2: Suburban Residential Development

Comments received and responses are divided into two sections below. The first section covers those which result in amendments and the second section covers those that do not result in amendments.

<b>Chapter 2: Responses that result in amendments</b>		
	<b>Comments received</b>	<b>Council response</b>
7.4.1	Representations commented that replacing 2 storey homes with 3 or 4 storey development (as per Figure 2.10c) will result in significant change to the character of an area, and therefore the statement of 'without significant change' is inaccurate.	As per the Local Plan Figure 6.4, it is expected that more and bigger buildings can be accommodated without significant change to the character of an area.  <i>Amendment to Paragraph 1.3.1: 'and will result in more and larger buildings.'</i>
7.4.2	Representations suggested that Paragraph 2.2.1 needs to be backed by stronger policy applying to smaller developments to provide them with credibility.	<i>Amendment to Paragraph 2.2.1: 'and Strategic Policies SP2 and SP4'</i>
7.4.3	Representations noted concern that SPD2 fails to encourage family sized homes and preferences the delivery of 1 or 2 bedroom units.	<i>Amendment to Paragraph 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.'</i>
7.4.4	Representations noted the need for clarity on the suitable provision of outdoor amenity space	SPD2 provides a section on the design of outdoor amenity space (refer to Section 2.34 within the SPD).  <i>Amendment to Paragraph 2.34.1: 'include outdoor amenity space as set out in policy DM10.4 of the Croydon Local Plan and... Where this is not possible, applicants will need to demonstrate this and provide shared outdoor amenity space in lieu.'</i>
7.4.5	Representations questioned whether the comprehensive development advocated in Section 2.4 would enhance an area and whether it aligned with the guidance within Section 2.15.	The guidance within SPD2 is devised to ensure development enhances, or where appropriate positively changes, an area. This can include bigger buildings. It is however recognised that Figure 2.4a needs to reflect the guidance within Section 2.15 as per the amendments below.

		<p><i>Amendment to Figure 2.4a to better reflect the guidance within Section 2.15.</i></p> <p><i>Amendment to include additional Paragraph 2.4.3: '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.'</i></p>
7.4.6	Responses noted that paragraph 2.6.8 bullet 1 on electric charging requirements should reflect London Plan standards.	<i>Amendment to Paragraph 2.6.8 bullet 1: 'in accordance with London Plan standards;'</i>
7.4.7	Responses commented that the text reading 'Car Park Design & Management Plan' should be amended to 'Parking Design and Management Plan'.	<i>Amendment to Paragraph 2.6.8 bullet 2: 'A Parking Design &amp; Management Plan'</i>
7.4.8	Responses noted that, in relation to 2.6.8 Bullet 3, the NPPF requires a Travel Plan for developments that will generate a "significant amount of movements". It was suggested the wording should be amended to 50+ dwellings, not 10+.	<p>As per Paragraph 111 of the National Planning Policy Framework all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed. The Council will make a judgement as to whether a proposed development would generate significant amounts of movement on a case by case basis, and where relevant this will include smaller schemes.</p> <p><i>Amendment to Paragraph 2.6.8 bullet 3: '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 considered 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.'</i></p>
7.4.9	Representations questioned whether Bullet 4 of paragraph 2.6.4 was	<i>Amendment - removal of Bullet 4.</i>

	contradictory to the purpose of the paragraph.	
	Responses noted the need for clarity on Paragraph 2.6.8 bullet 6 as to what the definition of 'larger developments' is. It was noted that free car club membership for a large number of residents will result in significant cost and impact viability. What happens if there is not a car club nearby or car club operators don't want to operate in that area? The wording needs to provide greater flexibility as there are still many unknowns around car clubs.	<i>Amendment to Paragraph 2.6.8 bullet 6: '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.'</i>
7.4.10	In the context of transport provision, representations noted that the document should be clearer that intensification would result in a need to improve public services, rather than an opportunity, and that there was a need for clarity on how this would be achieved.	It should be noted that it is not within the scope of SPD2 to set out infrastructure proposals, however the Council does plan for infrastructure as reflected in the amendments below and it is recognised this will be needed as our suburbs continue to accommodate more housing.  <i>Amendment to Paragraph 2.6.1: 'resulting in a need to deliver increased public transport capacity and provision.'</i>  <i>Amendment to Paragraph 2.6.2: 'The Croydon Local Plan, Infrastructure Delivery Plan and the London Plan provide detail on this.'</i>
7.4.11	Representations noted a need to refer to the Healthy Streets approach advocated by TfL.	<i>Amendment to Paragraph 2.6.2: 'This should put people, and their health, at the centre of the design of our neighbourhoods, in line with TfL's Healthy Street Approach.'</i>
7.4.12	Representations noted some support for permit-free developments, but recommended an amendment to the text to reflect a commitment to modifying or introducing new Controlled Parking Zones (CPZs) to help alleviate existing or potential parking stress and help manage the use of scarce public highway space.	<i>Amendment to include additional Paragraph 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.'</i>

7.4.13	<p>Representations commented that the SPD is unclear what specific character parameter(s) identifies the difference between accommodating growth without significant change to its character and that for the Areas of Focussed Intensification. This included a concern that allowing for change in scale &amp; type of dwelling was not necessarily compatible with assuming a suburban character, and not cognisant of the Borough Character Appraisal (BCA).</p>	<p>SPD2 expands upon the Local Plan policies for design &amp; character that are relevant across the borough in Chapter 2 and those that are specific for the Areas of Focussed Intensification in Chapter 3. It should also be noted that with high quality design it is possible to accommodate larger buildings with different types of dwelling whilst still assuming a suburban character. It should be noted that BCA provides an assessment of the current character, but as per the direction of the NPPF planning policies should allow for innovation &amp; change, including increased building densities. This is reflected in the Local Plan policies and expanded in the guidance within SPD2 that has been written to enable this. This has been reflected in the amendment below.</p> <p><i>Amendment to Paragraph 2.7.2:          ‘This does not exclude increased building sizes.’</i></p> <p><i>Amendment to Paragraph 2.7.5:          ‘as outlined in Policies DM10.1 – DM10.10 of the Croydon Local Plan. For the Areas of Focussed 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.’</i></p>
7.4.14	<p>Representations noted a general need for further clarity on what character is and considered the local demographic to be considered an aspect of character.</p>	<p>In planning terms, character is not defined by the local demographic, but by built physical characteristics. This is described in Section 2.7. The definition of these physical aspects has been enhanced in the following amendment.</p> <p><i>Amendment to the Intro Paragraph of Section 2.7: ‘This may include street layouts, building forms and positioning, landscaping, materials and architectural details.’</i></p>
7.4.15	<p>Representations raised concerns that Sections 2.7 &amp; 2.8 provided a map of typologies to help describe</p>	<p>The inclusion of the map of predominant housing typologies map (Figure 2.7a) within the draft was not intended to</p>

	<p>the character of the 16 places and is then followed by the three types of approaches to character advocated in the SPD. The map (Figure 2.7a) itself is very high level and it is unclear whether any/all of the three approaches are accepted anywhere, or whether some neighbourhoods should only see one of these types of development? If the former, this does not reflect the individual and specific character of the places and does not demonstrate how an applicant would meaningfully respond to character. Representations raised concerns that this may not provide a sound interpretation of policy DM10.</p>	<p>prescribe certain development typologies in any given area as this would be contradictory to policy. It is recognised there is greater need to visually describe how character can be interpreted, this is provided in the following amendment.</p> <p><i>Amendment - replacement of Figure 2.7a and replacement with contextual analysis figure.</i></p> <p>The guidance expands upon Local Plan policy DM10 by providing 3 distinct approaches that encourage high-quality design. It should be noted that an approach to character must be informed by the local context and it is not possible to prescribe an approach for each area across the borough within the SPD. This responds directly to the NPPF that prescribes that planning policies ‘should ensure that developments... are sympathetic to local character and history... while not preventing or discouraging appropriate innovation or change (such as increased densities)’. However, it is recognised that there is need to strengthen the guidance to ensure the ‘Approaches to Character’ are not meaningless and are clearly demonstrated within an application:</p> <p><i>Amendment to include additional Paragraph 2.7.4: ‘2.7.4 Applicants should undertake contextual analysis that identifies the positive physical characteristics of an area and informs the approach to character as set out in Section 2.8. An example of contextual analysis is provided in Figure 2.7a’</i></p> <p><i>Amendment to Paragraph 2.8.1: ‘In developing an approach to character, applicants should refer to Section 2.7 of this guide to help identify the existing character.’</i></p>
7.4.16	<p>Representations questioned how the Council will ensure new development ‘enhances’ the character of an area and what criteria there are to ensure this?</p>	<p>SPD2 provides the 3 approaches to character set out in Section 2.8 and has strengthened how character is responded to as per the amendments above. Further guidance is provided in the amendments below.</p> <p><i>Amendment to Paragraph 2.7.2: ‘This can be achieved through pursuing development that references and</i></p>

		<p><i>reinforces existing architectural styles or introduces new, well-designed architectural styles that add interest to the area.'</i></p> <p><i>Amendment to Paragraph 2.8.3: 'and will only be acceptable where there is a demonstration of high-quality design in the proposal.'</i></p>
7.4.17	<p>Representation noted that the guidance allows for bigger buildings but Section 2.8 advocates being of a similar density and massing.</p>	<p>SPD2 does support larger developments where they are well designed. In line with the NPPF this does not exclude increased densities. This has been reflected in the following amendment which refers to form, rather than density and massing.</p> <p><i>Amendment to Paragraph 2.8.5: 'Schemes should closely relate to the existing surrounding typologies by pursuing a similar form, style, materials and detailing.'</i></p>
7.4.18	<p>Representations questioned whether schemes are required to provide daylight and sunlight testing.</p>	<p>The Council do not normally require schemes of the scale covered by SPD2 to provide daylight and sunlight testing but do however consider that BRE guidance should be referred to as good practice.</p> <p><i>Amendment to Paragraph 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 on good practice for access to natural light.'</i></p>
7.4.19	<p>Representations requested clarification on the guidance within Paragraph 2.9.17 on what is meant by 'where acceptable separation distances cannot be achieved'.</p>	<p>This is where site constraints limit the placement of windows. It is noted that schemes that are considered to be over development or result in an overbearing appearance are not supported, and this is provided for throughout the guidance within Chapter 2.</p> <p><i>Amendment to Paragraph 2.9.17 to include 'due to site constraints'.</i> <i>Amendment to Paragraph 2.9.18 to include: 'quality of design'</i></p>
7.4.20	<p>Representations commented that Paragraph 2.9.8 is difficult to understand.</p>	<p><i>Amendment to include additional diagram – Figure 2.9e</i></p>
7.4.21	<p>Representations questioned the guidance and rationale behind the approach in Paragraph 2.9.3 on unneighbourly windows which gives less protection to neighbouring outlook.</p>	<p>The inclusion of Paragraph 2.9.3 which refers to unneighbourly windows does not undermine the protection awarded to most windows in neighbouring buildings. It is only those that exist that are considered to face onto a development site in an</p>

		<p>unreasonable manner as per the definition added to the glossary (see below) that would not usually be permitted.</p> <p><i>‘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.’</i></p>
7.4.22	<p>Representations requested that Paragraph 2.9.9 needs expanding to cover how and when a development would appear overbearing and/or create a poorly designed streetscene. This paragraph should set-out key criteria and link back to CLP policy.</p>	<p>The key criteria are provided within in paragraph 2.9.6 to ensure a development does not appear overbearing. It is however expected that this would be judged on a case by case basis as per the amendment below.</p> <p><i>Amendment to Paragraph 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.’</i></p>
7.4.23	<p>Representations expressed the belief that where surrounded by 2 storey houses, new development should be limited to 2 storeys plus mansard (rather than 3 storeys + roof accommodation). This included the understanding that any additional floor space beyond 3 floors would be contradictory to the Local Plan.</p>	<p>The guidance within SPD2 has been justified with the following amendment, cognisant of the Local Plan.</p> <p><i>Amendment to include Additional Paragraph 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.</i></p> <ul style="list-style-type: none"> <li><i>• 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.</i></li> <li><i>• Where a basement is partially concealed and not fully visible from the street, there is scope for</i></li> </ul>

		<i>accommodation on an additional lower level as this will not be read as full storey in the streetscene.'</i>
7.4.24	Representations noted that the appearance of the development diagrammed in Figure 2.10c appeared out of character due to its height and roof form.	The issue of height is covered in the amendment above. Whilst SPD2 advocates a range of roof forms as per Section 2.19, it is recognised a mansard roof to Figure 2.10c could diagrammatically respond to the neighbouring character more effectively.  <i>Amendment to Figure 2.10c to include a mansard style roof.</i>
7.4.25	Representations noted that Figure 2.10a was not accurate to all conditions due to the mature tree between the properties.	<i>Amendment to replace Figure 2.10a with figure showing development without a mature tree between developments of different heights.</i>
7.4.26	Representations expressed concerns that the development shown within Figures 2.11j, n and r would be overbearing on the neighbouring garden.	The 45° rule established in Section 2.11 is an accepted industry standard to minimise loss of light to neighbouring properties. The diagrams within 2.11j, n and r meet this standard and are included to demonstrate how different built form can be achieved within 45°. Guidance within 2.11.3 is provided to help ensure that the form of a development is coherent to achieve high quality design and in turn help minimise an overbearing appearance.  <i>Amendment to Paragraph 2.11.3: 'as demonstrated in Proposal 3 on pages 44 – 45'</i>  <i>Captions to Figures 2.11d-2.11s amended to refer more clearly to form, architectural coherence and relationship to 45° rule.</i>  <i>Figures amended to provide more realistic representation of planting between neighbouring properties.</i>
7.4.27	Representations noted concerns that the wording in Section 2.12 is quite restrictive (i.e. that proposals in rear garden should be one storey lower than host dwelling) and does not accord with the separation distances provided in guidance paragraph 2.9.10. Representations suggested 2.12 should be amended to reflect 2.9.10 and to provide greater flexibility on how subservience may be achieved.	<i>Amendment to 2.12.1 to clarify how subservience may be achieved and to correlate with separation distances provided in Paragraph 2.9.10: '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>

		<p><i>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).</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>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.'</i></p>
7.4.28	<p>Representations noted that Paragraph 2.12.1 ii states that ‘the proposal may be of the same number of storeys of the predominant building height in the area’ which contradicts policy DM10.1c which states that ‘in the case of development in the grounds of an existing building which is retained, development shall be subservient to that building’.</p>	<p><i>Amendment as above to give greater clarity to how subservience can be achieved through design.</i></p>
7.4.29	<p>Representations recommended that Section 2.12 should refer to Local Plan Policy DM10.4e.</p>	<p>Local Plan Policy DM10.4e is primarily concerned with the footprint and positioning of development within the grounds of an existing buildings, rather</p>

		<p>than height (as per Section 2.12 of SPD2). Amendments have been made to section 2.18 to account for Policy DM10.4e. Refer to 7.4.32 of this statement.</p>
7.4.30	<p>Representations questioned whether the guidance within Section 2.13 was contradictory to the Local Plan Policy of seeking to achieve a minimum of 3 storeys and suggested rethinking use of phrase 'predominant' building height in this section.</p>	<p><i>Amendment to 2.13.1: '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.'</i></p>
7.4.31	<p>Representations commented that it is unclear why larger development is acceptable on corner plots as per Section 2.14, and that this guidance could result in unreasonably large buildings with unacceptable overlooking and limited outdoor amenity space.</p>	<p>Corner plots provide a marker point within the townscape and therefore can accommodate more prominent buildings with a dual frontage, this does not however negate the need to avoid overlooking and provide adequate outdoor amenity space. This is reflected in Section 2.14 and strengthened in the amendments below.</p> <p><i>Amendment to Paragraph 2.14.1: 'accommodate additional height and depth as marker points within the townscape.'</i></p> <p><i>Amendment to Paragraph 2.14.2 &amp; 2.14.3: 'This will be judged on a case by case basis and balanced against any unreasonable impact on neighbouring amenity... 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.'</i></p>
7.4.32	<p>Representations requested further clarity on DM10.4e in Section 2.17 of the SPD.</p>	<p><i>Section 2.17 is renumbered Section 2.18. Amendment to Paragraph 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... 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</i></p>

		<p><i>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.'</i></p> <p><i>Section 2.17 retitled to '2.18 Positioning of development in rear garden and back land sites'</i></p>
7.4.33	Representations questioned whether balconies are acceptable to the front and rear of a property.	<p><i>Amendment to Paragraph 2.26.2: '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.'</i></p>
7.4.34	Representations suggested that Section 2.27 should include wiring for external lighting, broadband and satellite services, and how these may be located discreetly.	<p><i>Amendment to Paragraph 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... 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... Applicants should illustrate external servicing item locations on drawings submitted with planning applications.'</i></p>
7.4.35	Representations noted that Section 2.28 does not provide clarity on policy to DM10.4e.	<p>Section 2.28 has been strengthened to provide clarity to Local Plan Policy DM10.4e as per the amendment below.</p> <p><i>Amendment to 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.'</i></p>
7.4.36	Representations noted there was no discussion on subdividing existing properties and the resulting quality of accommodation, including the need to meet planning policies internal spatial requirements of London plan.	<p><i>Amendment to Paragraph 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.'</i></p>

7.4.37	Representations noted that many sites covered by SPD2 may have existing entrances that cannot be widened due to land ownership and as such the guidance within Paragraph 2.29.7 should be amended so as not to unreasonably preclude development in these instances.	<i>Amendment to Paragraph 2.29.7: 'Entrances should generally be of a width that meet the criteria set out in Figure 2.29e... 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.'</i>
7.4.38	Representations noted that all new driveways to developments that are on the TLRN or a tram route should be consulted and made in agreement with TfL. This included a particular comment relating to vegetation and glare in close proximity to trams.	<i>Amendment to include additional Paragraph 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.'</i>  It is noted that the issue of vegetation and glare in close proximity to a tram route would be captured during the consultation process with TfL.
7.4.39	Representations were supportive of providing new routes through suburban blocks but noted the need to control vehicle movements and allow for people focussed design.	<i>Amendment to include additional Paragraph 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.'</i>  <i>Amendment to Paragraph 2.29.13: 'to create pedestrian connections through suburban blocks... and will be secured through planning agreements.'</i>
7.4.40	Representations raised concerns that SPD2 allows for inadequate parking provision. These representations considered the parking provision allowed for in the London Plan to be low and more suited to inner cities and as such did not find it appropriate to reduce this further in areas where there is little public transport. These also noted a lack of provision of parking for delivery/visitor vehicles within SPD2. These representations also considered that more parking may be required to support the sustainable development of our communities.	SPD2 refers to the parking provision requirements set out in the Local Plan, which refer to the London Plan standards. The London Plan requirements account for delivery/visitor vehicle and servicing requirements of development. Policy states that where possible parking should be reduced, recognising that: Strategically there is the ambition to reduce reliance on private vehicular use due to current issues facing public health, congestion and pollution. This is set out in the Mayor's Transport Strategy. Parking is at the expense of green space and therefore should be minimised to protect biodiversity; where space and traffic management permits, as assessed in parking stress assessments, parking

		<p>may be accommodated on streets where there is already tarmacked surfaces and therefore minimising loss of green space and allowing for greater development potential.                  Higher parking requirements would result in less developable areas.</p> <p>On balance promoting reduced parking provision is therefore considered by the Council to support the sustainable development of our communities. However it is recognised that in the areas of lowest PTAL there will be greater car reliance and that where parking would place significant demands on kerbside parking there may be need to introduce Controlled Parking Zones as per the amendments below.</p> <p><i>Amendment to include additional Paragraph 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.'</i></p> <p><i>Amendment to include additional Paragraph 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.'</i></p>
7.4.41	<p>Representations noted that reliance on on-street parking failed to account for cumulative impact of existing permission not yet implemented and that more on-street parking will result in a reduction of</p>	<p><i>Amendment to Paragraph 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</i></p>

	road safety, and reduced space for pedestrians and cyclists.	<i>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 Methodology). Parking on streets should not be through designated bays.'</i>
7.4.42	Representations noted the opportunity to emphasise the flexible use of parking to ensure that land is used as efficiently as possible over the life of a development, including allowing parking spaces to be easily converted to other valuable uses.	<i>Amendment to Paragraph 2.30.10: '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.'</i>
7.4.43	Representations supported using screening to parking areas and noted the opportunity to strengthen this through advocating parking between bays.	<i>Amendment to Paragraph 2.30.10: 'be screened with planting between and around bays and be informed by a landscaping plan which minimises visual impact on the streetcene and neighbouring properties;'</i>
7.4.44	Representations noted the need for cycle storage to be in addition to general storage area and not in a combined bike and general storage area. Reference should also be made to need to accommodate visitor cycle parking.	<i>Amendment to Paragraph 2.31.2: 'Be in addition and separate to the general storage provision required for each new dwelling.'</i> <i>Amendment to Paragraph 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.'</i>
7.4.45	Representations noted a need to prioritise the protection of garden space within Section 2.32.	<i>Amendment to Paragraph 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... 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.'</i>
7.4.46	Representations noted the need to provide stronger guidance that protects biodiversity. This should promote habitats for existing wildlife and recognise the associated amenity benefits for the local community. This should include further guidance on replacing lost trees and shrubs.	Section 2.33 of the SPD provides guidance related to biodiversity and has been strengthened as per the following amendment.  <i>Amendment to Paragraph 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 be cognisant of Policy SP7.4, DM27 and DM28 of the Croydon Local Plan which</i>

		<p><i>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.</i></p> <p><i>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 of a site boundary as a result of development.</i></p> <p><i>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.'</i></p> <p><i>Amendment to include additional paragraph 2.33.2: 'Applicants are advised to refer the Urban Tree Manual which provides advice on selecting the right tree for the right location.'</i></p>
7.4.47	<p>Representations noted the need to provide for multiple uses of shared outdoor amenity spaces at the same time, such as families &amp; activities and those seeking peace &amp; quiet.</p>	<p><i>Amendment to Paragraph 2.34.1: '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 units, as shown in Figure 2.34c. 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.</i></p> <p><i>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... 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.'</i></p>

7.4.48	Representations noted that the guidance within Paragraph 2.34.1 Bullet 7 & 8 is too onerous and not evidenced or justified.	<i>Amendment to Paragraph 2.34.1 Bullet 7/8: '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.'</i>
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**Chapter 2: Responses that do not result in amendments**

	<b>Comments received</b>	<b>Council response</b>
7.4.49	Representations questioned who decides what is and isn't acceptable, and that SPD2 doesn't give weight to residents opinion. For example, who judges what the right mix of homes is and whether development contributes to local character in relation to the overarching principles in Paragraph 2.2 of the SPD2.	Policies within the Local Plan are evidenced based and the community were consulted in the development of the Plan. Similarly, SPD2 has been consulted on and amended to reflect comments received from the community where it would not contradict policy. Specifically, the right mix of homes is defined by strategic policies in the Croydon Local Plan. The guidance on character within SPD2, which expands upon Local Plan policy DM10, help to define how development may contribute to character. It should be noted that each case is judged against the relevant policies and guidance as a whole to reach a balanced decision that weighs the benefit of an approval against any negatives.
7.4.50	Representations raised concerns that SPD2 facilitates the destruction of good quality family homes, to be replaced by unaffordable flats for which there is no justifiable demand.	The Croydon Local Plan provides policies that seek to provide a high proportion of 3 bedroom homes in new development and protect form the loss of smaller family homes, supported by evidence that demonstrates the need for family homes of this particular size. There is also need for 1 and 2 bedroom homes. Where a larger family home can be redeveloped to provide this mix of homes it is therefore supported.
7.4.51	Representations requested that the requirement to supply a minimum ratio of 3-bed dwellings be more firmly applied to avoid developers providing solely 1 or 2 bed flats. Contrasting to this, some representations noted that the requirement to maximise 3 bed homes in minor applications has not been tested, justified or evidenced, and therefore should not be included in SPD2 as it is a policy matter and risks making smaller sites unviable.	Croydon Local Plan strategic policies are relevant to all schemes and therefore wherever possible minor developments should seek to deliver a high proportion of 3 bedroom homes. This is reflected in Section 2.3 of the SPD.

7.4.52	Representations noted that Croydon's Local Plan policy for play space is only relevant for major schemes. The expectation within SPD2 for shared communal play on minors is above and beyond London Plan and Croydon Local Plan requirements and therefore it should be deleted.	The guidance within SPD2 is not a requirement for specific play equipment for minor schemes, but is guidance of best practice to ensure families who live within smaller developments are provided for with space for play. It represents a good design aspiration and can deliver value to developers in making more attractive developments for all types of residents.
7.4.53	Representations noted that Section 2.3 does not make provision for affordable housing in smaller schemes.	The provision of affordable homes is a policy matter and set out in the Croydon Local Plan.
7.4.54	Representations noted a lack of guidance for "assisted living" or dwellings appropriate for disabled persons. Similarly, representations noted a lack of transport provision for disabled persons.	<p>The London Plan policies set requirements for accessible, adaptable and wheelchair user dwellings in relation to Building Regulations standards. These policies are applicable to development within Croydon.</p> <p>SPD2 is not a transport document and provision is made for disabled persons within the Local Implementation Plan and other relevant transport planning documents.</p>
7.4.55	Representations noted that the aggregate impact of increased concentrations of flatted developments may disrupt the community ethos and kill-off neighbourly relations, such as "chatting over-the-garden-fence". The document should better discriminate between good & bad places to build flats and the appropriateness of their size.	The SPD cannot seek to designate areas as appropriate for development or protection as this is a matter for the Local Plan. The type of dwelling within a street is not considered to negatively impact an existing community ethos which may be added to through a greater number of residents in an area.
7.4.56	Representations noted a need for some form of protection is needed to safeguard areas with a special character.	It is noted that the Local Plan provides protection for areas of particular heritage & character value through Conservation Area and Local Heritage Area designations.
7.4.57	Representations noted that the offset distances in Fig 2.12a & 2.12b (25m rule) is at odds with Fig 2.9d (18m rule).	Where relevant Fig 2.9d can be applied in conjunction with Fig 2.12a & 2.12b. Fig 2.9d provides minimum separation distance between the rear of properties, whereas Fig 2.9d determines the relative heights of such development at different distances.
7.4.58	Representations noted that there are no recommended policies or methodologies to actually quantify the required "Sustainable Transport Facilities", including a more	SPD2 is primarily concerned with the design of residential developments in suburban locations and is not a transport planning document. The Council's ambitions and policies on delivering

	<p>comprehensive cycling strategy that prioritises safe cycling routes. Representations noted that policy should seek to balance increased densities with the need to improve patchy transport provision.</p>	<p>sustainable transport in order to accommodate the predicted levels of growth and development over the next twenty years are set out in the third Local Implementation Plan (LIP3) and the Croydon Local Plan.</p> <p>A Cycling Strategy for the borough was published in early 2018 and further details of the proposed cycling network are set out in the LIP3. Croydon is seeking to improve transport provision in lower PTAL areas through the delivery of electric cycle hire schemes, new demand responsive bus services, connected and autonomous bus services, and the delivery of new cycle routes.</p>
7.4.59	<p>In relation to Paragraph 2.6.7 representations commented that it should be up to the developer to decide where parking spaces within communal car park should be leased rather than sold and that this is not a planning issue.</p>	<p>The Council consider this to be a planning issue and note that it is included in the draft new London Plan policy T6.1 Residential Parking. This position was supported in representations received from TfL.</p>
7.4.60	<p>Representations questioned whether charging points for e-bikes is a policy requirement.</p>	<p>Table 10.1 in the Croydon Local Plan requires cycle parking for major residential development. Bullet 5 of Section 2.6.8 of SPD2 provides suitable guidance to advocate that developments need to consider this in their proposals.</p>
7.4.61	<p>Representations noted concerns that the Croydon Local Plan Table 6.5 and subsequently SPD2 deliberately target certain types of development. As a result, these representations consider SPD2 fails to safeguard the particular character of areas with certain types of existing development. These representations noted that the purpose of Borough Character Appraisal was stated to be to provide protection and preservation of character, rather than need designations such as the former LASCs.</p>	<p>The Croydon Local Plan was consulted on and examined prior to adoption. This facilitates development to ensure sufficient delivery of housing.</p> <p>SPD2 provides clarification on what is meant by character and how to interpret the Borough Character Appraisal, and importantly how development proposals may respond to character to enable evolution or gradual change, in line with the provisions in Table 6.4 of the Local Plan.</p>
7.4.62	<p>Representations noted that more weight needs to be given to density (as prescribed by the London Plan Density Matrix).</p>	<p>It is noted the draft new London Plan does no longer include a density matrix, instead advocates development on small sites within an 800m radius of town centre or station, or in areas with a PTAL 3 or more.</p>
7.4.63	<p>Representations questioned whether sufficient flexibility will be given by Council officers when applying the three approaches prescribed in</p>	<p>The 3 broad approaches have been defined to allow for architectural innovation and creativity whilst emphasising the importance of character and need to</p>

	Section 2.8. Otherwise actively prescribing three design approaches could stifle architectural innovation and creativity.	respond to it within proposals. They are broad enough not stifle innovation, but are included so that applicants must demonstrate an approach to character within applications. Each application is judged on a case by case basis.
7.4.64	Representations noted concerns that the guidance on character in Sections 2.7 & 2.8 is too general and needs to be more localised.	SPD2 requires developers to do contextual analysis to ensure a development proposal responds to the specifics of local character. SPD2 is supported by the Borough Character Appraisal that identified character of different places within the borough in detail and therefore SPD2 does not seek to reiterate it.
7.4.65	In relation to paragraph 2.9.8, representations questioned in what circumstances would these distances “be difficult to achieve” and how does this relate to Local Plan policy DM10.4e.	It should be noted that this guidance refers to where the fronts of development face each other, whereas DM10.4e refers specifically to the protection of garden space in the scenario of development within the garden of an existing dwelling to protection of garden space (this is covered in section 2.18 of SPD2, including reference to Policy DM10.4e). In some scenarios it is possible that development within the grounds of an existing dwelling may front each other and result in the loss of garden, in such circumstances, the policy would be read in conjunction with this guidance and officers would reach a balanced decision.
7.4.66	Representations questioned whether the 45° rule in Section 2.11 is appropriate. They noted a less acute angle would provide for a much better relationship for existing residents and communities.	The 45° rule is a widely applied standard across the country.
7.4.67	Representations noted that Paragraph 2.15.2 may not sufficiently reduce the sense of massing created by linked developments.	It is noted there are successful examples of where larger developments have successfully introduced linking elements to reduce the overall appearance of mass, this is demonstrated in Figure 2.13d.
7.4.68	Representations questions whether the guidance on parking provision correlated to GLA standards, noting that a Mayor of London paper requires reasonable parking to be provided in zones of low PTAL.	TfL were consulted on the SPD and noted that the guidance on parking accorded with their position. Refer to paragraph 6.5 of this statement.
7.4.69	Representations questioned whether paragraph 2.31 allows for the new waste collection services that have recently been launched across the borough?	Whilst the new waste collection services require a larger number of bins (depending on the property type), the guidance within the SPD2 does not dictate specific sizes of storage spaces, but that they must be

		designed to sufficiently accommodate waste receptacles and guidance on how they can be designed so as to integrate into the proposal. As such the guidance within SPD2 remains relevant.
7.4.70	Representations suggested including a separate section on cycle parking to emphasise its importance in light of mayoral priority of cycling.	During earlier drafting options separate sections on cycling parking was provided, however it proved that much of the content was repetitive and added to a lengthy document that risks being cumbersome for the end users.
7.4.71	Representation noted that SPD2 does not define quantities of outdoor private/shared amenity space required.	This is a policy matter and it set out in the Local Plan and London Plan.
7.4.72	Representations questioned whether the separation distances in this chapter meet requirements of the new Croydon Plan or London Plan.	The Croydon Local Plan refers to the London Housing Design Guide separation distances of 18m-21m and that that whilst these are useful yardsticks for visual privacy, they do not need to be adhered to rigidly as this may limit the variety of urban spaces and housing types. The Local Plan does not set these distances into a policy requirement and notes that they should be applied with some flexibility. There are many examples across London where there are smaller separation distances that do not result in a reasonable loss of privacy. This informed the minimum distance of 12m between two windows of habitable rooms in new properties set out in SPD2. It should be noted that existing amenity of a neighbouring property is protected in SPD2 by requiring a separation distance of 18m between windows of habitable rooms.
7.4.73	Representations questioned whether it is appropriate to have parking to the front and rear of a property considering the impacts to neighbouring privacy and amenity, as well as having an impact on the streetscene.	The parking designs set out within SPD2 are in line with the CLP Policy 10.1 – this is referenced within guidance Paragraph 2.30.2 and 2.30.3.
7.4.74	Representations commented that SPD2 doesn't appear to support any form of car parking for disabled persons.	SPD2 refers to the London Plan requirements in guidance Paragraph 2.6.6 in relation to disabled parking provision.
7.4.75	Representation supported the greater use of bicycles advocated in Section 2.6, but noted concerns that increased use of bicycles would be limited due to the topography of the	The Strategic Transport team is currently developing a scheme for the roll out of a borough wide cycle hire scheme that will include electric bikes and be located at hubs around the borough, including

	borough, lack of cycle lanes and inconvenience when transporting children. Several representations expressed concern that few people would use e-bikes.	locations in the south of the borough, for example at Kenley Rail Station. As part of the Local Plan and development process we seek to require charging infrastructure in new developments for electric bikes as well as electric vehicles.
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### 7.5 Chapter 3: Areas of Focussed Intensification

Comments received and responses are divided into two sections below. The first section covers those which result in amendments and the second section covers those that do not result in amendments.

<b><u>Chapter 3: Responses that result in amendments</u></b>		
<b>General comments relevant to all Areas of Focussed Intensification (AFI)</b>		
	<b>Comments received</b>	<b>Council response</b>
7.5.1	Representations raised concerns that it was unclear whether the rest of SPD2 also applies in AFIs or what sections within the other chapters are relevant to the AFIs.	<i>Amendments to include additional section '3.2 General guidance for Intensification Areas' has been added which addresses a number of concerns that apply in all the Areas of Focussed Intensification, including a paragraph on the application of guidance from other chapters as follows: '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 &amp; external appearance, site layout &amp; servicing, and landscaping &amp; 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 &amp; 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.'</i>
7.5.2	Representations noted that car parking design within AFIs will need to ensure that the movement of	<i>Amendment to include additional Paragraph 3.2.4: 'The provision of sustainable transport facilities will be</i>

	<p>pedestrians, cycles, public transport and emergency services is not impeded, and that developments should also promote alternatives to car use, and promote walking, cycling and public transport use.</p>	<p><i>facilitated through transport improvement schemes such as the South Croydon Bus Review. Developments must also contribute to this through ensuring they promote and support safer walking and cycling opportunities. This will need to take into account local road safety issues which the Council will also seek to work with local communities to address.</i></p>
<p>7.5.3</p>	<p>Representations agreed with the principles set out for AFIs but noted that communities would be more likely to view the illustrations for the evolution of the street more positively if the benefits of intensification are made clearer. It is important to understand the potential benefits and opportunities that development can bring to improve function and character of area for people in reality. This could include better facilities for walking, cycling and public transport access, safer roads, public realm improvements, better services, more street trees and better environment.</p>	<p><i>Amendment to include additional paragraphs 3.2.2-3.2.24:          '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.          3.2.6 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.'</i></p>

Kenley		
7.5.4	Representations noted that TfL have developed proposals for improving the A22 which were consulted on in 2017 and that TfL are planning on progressing these proposals.	<p>The Council are seeking to work further with TfL on these proposals as they were developed prior to Kenley being designated as an AFI.</p> <p><i>Amendment to Paragraph 3.4.4: '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.'</i></p>
7.5.5	Representations commented that SPD2 does not give sufficient protection the leafy character of Kenley, the Site of Nature Conservation at Oaklands and the setting of Riddlesdown.	<p><i>Amendment to Paragraph 3.6 Bullet 16: '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 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.'</i></p> <p><i>Amendment to Paragraph 3.4.2: 'Part of Oaklands is designated as a Site of Nature Conservation Importance; any development on this site must take account of this.'</i></p> <p><i>Amendment to Paragraph 3.4.3: '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.'</i></p>
7.5.6	Representations noted that the railway is not considered to be the community heart as it is privately and commercially owned, and that there are a number of other publicly accessible spaces that serve the community.	<p><i>Amendment to 3.3.1: '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.'</i></p>
7.5.7	Representation noted the need for increased train service on the Kenley line to cater for any increase in population and an improved bus service. Representations also raised concerns relating to road safety and congestion within the Kenley AFI.	<p>Road safety is an important issue and considered in all development applications, including review by the Council's Strategic Transport team to ensure road safety is not compromised. The following amendments have been made to recognise the communities</p>

	<p>The following factors contribute to this:</p> <ul style="list-style-type: none"> <li>• Narrow roads, some of which containing blind bends and lack pavements.</li> <li>• Hump back bridge over the railway line provides limited visibility. It has narrow pavements and is the only crossing point for disabled access to cross to other platform at station</li> <li>• Limited on street parking available – being in high demand in certain areas.</li> <li>• Hazardous junction with A22.</li> <li>• Lack of pedestrian crossing over the A22 to bus stop.</li> </ul> <p>These representations noted the need to deliver a walk-able and cycle-friendly community in Kenley, and that development should not be permitted where road safety is compromised (in accordance with the NPPF).</p>	<p>concerns regarding transport and road safety within the Kenley AFI.</p> <p><i>Amendment to Paragraph 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 the 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.’</i></p> <p><i>Amendment to Paragraph 3.6 Bullet 17: ‘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.’</i></p>
7.5.8	<p>Representations noted proposed development would put increased pressure on existing infrastructure requiring expenditure on services such as schools &amp; medical facilities. Representations also noted the need to improve the retail offering in the area to support an increased population.</p>	<p>It is noted that Kenley is relatively well served by publicly accessible services, which partly underpinned its designation as an AFI within the Local Plan. Plans to improve social infrastructure are set out in the Council’s IDP and the Croydon Local Plan.</p> <p><i>Amendment to include additional Paragraph 3.4.5: ‘There is an existing GP surgery, local schools, the Kenley</i></p>

		<i>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.'</i>
7.5.9	Representations commented that flooding in the Kenley AFI is an issue and there is a need to steer all new development away from Flood Zone 3, and any areas at high risk of Surface Water Flooding. There is a need to avoid exacerbating flooding that occurs around the station.	<i>Amendment to Paragraph 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.'</i>
7.5.10	Representations noted limited street lighting in the Kenley AFI which impacts safe walking at night.	<i>Amendment to Paragraph 3.4.4: 'The safety of the lanes may also be improved by the provision of lighting.'</i>
7.5.11	Representations commented that the implications of topography needs to be considered in terms of access to new developments.	<i>Amendment to remove bullet 12 and include additional bullet 15 in Paragraph 3.6: 'Development proposals must consider the topography carefully to ensure appropriate access and minimise the use of retaining walls (Refer to 2.3.5 for guidance).'</i>
7.5.12	Representations commented that the Figures 3.5b and 3.5c indicated development that may impact the heritage of listed railway station; remove the station car park where on street parking is limited; and see the removal of the doctors' surgery.	<p>These figures are for illustration purposes only to describe a potential development scenario. In detail, it is noted that the Croydon Local Plan provides policies to protect from the loss of community facilities and for the protection of heritage assets, and any application would be judged against these and the impact loss of parking would have on surrounding streets.</p> <p><i>Amendment to Figures 3.5b and c to show development set further away from the railway station.</i></p>
<b>Forestdale</b>		
7.5.13	Representations noted that the existing shopping parades and church are already the heart of the community. The diagrams illustrate the removal of some of these services.	<p><i>Amendment to Paragraph 3.7.1: 'there is an opportunity to enhance the suburban village heart to service greater development.'</i></p> <p>It should be noted that any development proposals that involve redeveloping sites with existing community and/or employment spaces will have to align with the Croydon Local Plan policies which seek to limit their loss.</p>
7.5.14	Representations commented that the SPD does not include any detail	<i>Amendment to include additional Paragraph 3.8.5:</i>

	about the provision of infrastructure within the Forestdale AFI.	<i>'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.'</i>
7.5.15	Representations considered it inaccurate to state that grounds associated with medium-rise blocks are typically underutilised. These grounds consist of communal gardens that are part of the landscaping and necessary to the wellbeing of residents, with the remainder of hard surface used for access to garages and car parking.	<i>Amendment to Paragraph 3.8.3: '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.'</i>  <i>Amendment to Bullet 15 of Paragraph 3.10: '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.'</i>
7.5.16	Representations noted it would be beneficial to provide better connections between the neighbourhood centre and green belt.	<i>Amendment to Paragraph 3.8.4: '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.'</i>
7.5.17	Representations questioned the reference to a need to improve safety and which part of the AFI was currently unsafe.	<i>Amendment to Bullet 14 of Paragraph 3.10: '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.'</i>
<b>Brighton Road</b>		
7.5.18	Representations commented that the SPD notes the proposals will create a sense of place, however it is considered there is already a sense of place.	<i>Amendment to Paragraph 3.11.1: 'develop the sense of place where it is diminished by the busy nature of Brighton Road and under-utilised plots.'</i>
7.5.19	Representations commented that the draft did not accurately reflect existing development activity in the area.	<i>Amendment to include additional Paragraph 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.'</i>
7.5.20	Representations commented that there is a need to steer all new	<i>Amendment to include additional Paragraph 3.12.7: 'Development should</i>

	development away from Flood Zone 3, and any areas at high risk of Surface Water Flooding.	<i>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.'</i>
7.5.21	Representations notes that 3.12.3 refers to South Croydon recreation ground being an outlook for new development. Lidl already has most of frontage and an HA most of the rest. This has already been delivered and should not be included for the future.	Developments underway have been referred to in the amendment listed above (refer to 7.5.19 of this statement). There are other potential windfall sites close to the recreation ground that could have an outlook onto the recreation ground, as such this statement remains.  <i>Amendment of 'sports field' and 'playing fields' in 3.11.1 and 3.12.2: 'recreation ground.'</i>
7.5.22	Representations disagreed that car-parking areas are under-utilised as they provide for those visiting shops and commuters, and therefore should not be built on.	<i>Amendment to 3.12.4 removal of 'car parking'.</i>
7.5.23	Representations noted that Figures 3.13b & 3.13c incorrectly show the development of sites that are protected or already under construction. The document suggests that the Red Deer building should be at the heart of the area but the indicative illustrations show the redevelopment of this site. The former BMW garage is sited as possible for development, but this is already in the process of being developed by Lidl. The site behind the Red Deer is just in the process of completion.	It should be noted that the diagrams are illustrative.  <i>Amendments to figures 3.13b &amp; 3.13c have been made to reflect development already underway in 2018.</i>
7.5.24	Representations noted the need to protect from the loss of employment and community space.	<i>Amendment to include additional Paragraph 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.'</i>
<b>Shirley</b>		
7.5.25	Representations commented that Shirley has no connection to tram or train and there are often standstills on the dual carriageway. Given this, it is unclear that there is sufficient established infrastructure and there	It should be noted that whilst the area is not served by Tram or Train it is well served by a number of bus routes. Planning for infrastructure is beyond the scope of the SPD, however further detail on future infrastructure provision is set out

	is a need to plan for additional transport infrastructure.	in the Croydon Infrastructure Delivery Plan.  <i>Amendment to Paragraph 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.'</i>
7.5.26	Representations noted that the Shirley / Addiscombe road shopping area (defined as the Neighbourhood Centre in the Croydon Local Plan) provides a good offer of independent shops and is easily accessible by nearby parking in neighbouring street and good bus services.	<i>Amendment to 3.16.2: 'The roundabout at Shirley and Addiscombe Roads is bordered by the successful parade of independent shops that provide a useful service to the community at this key intersection.'</i>
7.5.27	Representations expressed that the Wickham Road/Hartland War/Orchard section of the AFI provides a vibrant library, retirement home and shop, and the need to protect these from being lost.	<i>Amendment of 3.16.3 to remove the Synagogue and adjacent open space as this is outside of the Intensification Area boundary and include Shirley Library, noting the importance of the existing community uses as follows: '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.'</i>
7.5.28	Representations questioned what is the meaning of the phrase "mending this separation" in paragraph 3.16.4.	<i>Amendment to Paragraph 3.16.4: '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.'</i>

**Chapter 3: Responses that do not result in amendments**

*(Note: the responses below have a prefix to define which section of Chapter 3 they refer to)*

7.5.29	General : Representations requested clarity on the District, Local and Neighbourhood Centres referred to in the caption of Figure 3.1a, and the need to identify them on this map. Representations commented that highlighting these areas was misleading as it indicated they are intensification areas.	It should be noted that District, Local and Neighbourhood Centres are designated in the Croydon Local Plan and can be viewed in detail on the Croydon Local Plan interactive map: <a href="http://www.planvu.co.uk/croydon2018/">http://www.planvu.co.uk/croydon2018/</a>  Metropolitan, District and Local Centres are shaded grey to indicate that they are also areas that are expected to accommodate significant growth as per Local Plan policies specific for those areas
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		and that the Areas of Focused Intensification are in addition to these areas of grows.
7.5.30	General: Representations suggested the level of detail provided in the document for the Areas of Focused Intensification should have been included in the Local Plan and subject to the examination process.	The detail provided supplements and expands on the designations and overarching policies for the Intensification Areas provided for in the Local Plan. Given the areas are relatively small geographical areas, the extent of detail in the SPD and the need for flexibility as development progresses within them, as an SPD the guidance provides a suitable level of weight and detail for steering determination of forthcoming planning applications.
7.5.31	General: Representations considered the boundaries for the AFIs to be inappropriate and that they should be amended.	The boundaries were determined by evidence that supported their designation within the Croydon Local Plan 2018. The SPD cannot seek to amend the boundaries.
7.5.32	General: Representation questioned whether the proposals for the AFIs are deliverable given land ownership constraints.	Development on sites within the AFIs will be dependent on landowners, but there are sites within these areas already being developed or coming forward for planning permission.
7.5.33	General: Representations commented that the Council should review other areas in south of the Borough that might be appropriate to be designated as an AFI.	The designation of an AFI is a matter for the Local Plan. It is however noted that the draft new London Plan encourages intensification within an 800m circumference of a station or town centre boundary, or within a PTAL of 3-6.
7.5.34	Kenley: Representations raised concern that street parking impact assessments fail to recognise additional stress at peak times as a result of school runs and commuter drop-offs/pick-ups. They also noted that commuters are sometimes willing to walk considerable distance to access free on-street parking. These representations noted there was no suitable plan for restricting parking or how a CPZ would be managed.	The Council requires the use of the standard Lambeth Parking Survey Methodology where parking is monitored during the weekday and overnight, if the site is near a commercial centre or weekend parking is a problem then a survey over the weekend will also be required. This ensures that commuter parking is considered in any parking stress survey. It should be noted that the introduction of controlled parking zones are currently resident led and if a group of residents feel that there is a particular problem that can be resolved through parking controls then they may approach the Council to request the introduction of controls. School runs and commuter pick up and drop off will be a temporary time specific issue which can be relieved through the introduction of parking controls or restrictions such as double yellow lines, however the resolution will involve increased enforcement of parking and

		drop off activity and the introduction of measures such as school pedestrian zones to encourage mode shift to walking, cycling and public transport.
7.5.35	Kenley: Representations requested a template for development along Welcomes Road, in conjunction with the Council's Strategic Transport & Development Management services. This would seek to balance new housing with other factors specific to the road.	Officers from the Strategic Transport and Development Management services have been in dialogue with residents of Welcomes Road. It is noted that the Regeneration, Strategic Transport and Spatial Planning services are working with the community to develop a Kenley Community Plan that may begin to assess these issues in more detail.
7.5.36	Kenley: Representations noted that minimal parking provision within development sites in Kenley will not work due to the limited alternative transport provision available and that parking on roads would be dangerous in many places due to the nature of the steep and narrow lanes.	Road safety and transport provision in Kenley have been addressed in paragraph 7.5.7 of this statement.
7.5.37	Kenley: Representations noted that it is not possible to establish how many new properties are being proposed, and there was no indication how many would be affordable.	The designation as an AFI is to facilitate a greater amount of development; whilst there are no specific targets for this area, there are borough wide housing targets set within the Local Plan and London Plan. Where relevant, developments will need to provide affordable housing in accordance with Local Plan policy SP2.
7.5.38	Kenley: Representations suggested delaying the introduction of the AFI designation on the valley side of the railway until all parties are happy that infrastructure can cope with planned increase in traffic.	The boundaries for the AFIs were adopted as part of the Local Plan in February 2018. They underwent examination by the planning inspectorate and were found to be sound. The SPD cannot seek to amend them as this is a matter for the Local Plan.
7.5.39	Kenley: Representations questioned whether the proposals for Kenley in the SPD will meet the ambition of the document to 'both limit any negative impact on places, including the amenity of existing residents, and frame opportunities where increased densities can enhance places and bring benefits to communities.' These representations noted the opinion that it will result in profit orientated piecemeal development with no concerns for the wider impact on the environment or the community. If the Council wishes to achieve its objectives it will need to take a more active role than merely	The detailed technical guidance contained within Chapter 3 (and where relevant to the AFIs, in Chapter 2) of the SPD are designed to ensure individual proposals take due consideration to the wider context. The Council seek to work with applicants to ensure they are thinking comprehensively about their development and the wider opportunities and benefits it may present to the local area.

	responding to the planning applications of individual developers.	
7.5.40	Kenley: Representations questioned what the timescale for development is.	The Croydon Local Plan, where the AFIs are designated, runs from 2018-2036. Delivery of development is dependent on individual land owners coming forward with proposals and the Council has no control on if and when this will be.
7.5.41	Kenley: Representations questioned whether the pressure on the A22 as a result of nearby development in Whyteleafe and Tandridge have been considered?	It is noted that the A22 is subject to proposed improvements by TfL. Where relevant Croydon Council are consulted on developments in neighbouring boroughs.
7.5.42	Kenley: Representations noted that SPD2 refers to transport reviews but there is no indication that money is available to improve services or how they would benefit Kenley.	Please refer to paragraph 7.5.7 of this statement that refers to the relevant reviews and how they will benefit Kenley. The funding of transport related projects is identified within the Infrastructure Delivery Plan.
7.5.43	Kenley: Representations noted that there is no specific reference to an extended provision of medical services or how the shopping parade would be enhanced in light of the national decline of high street shopping.	It should be noted that the SPD is primarily a residential design guide for the suburbs. Provision to extend medical services is made through policies and site allocations within the Local Plan, along with the Infrastructure Delivery Plan. It is expected that shopping parade in Kenley will be a factor within the development of the Keenly Community Plan project being launched by the Council.
7.5.44	Kenley: Representations noted that there is a large unutilised site to rear of Old Police Station, and that issues of flooding have ruined applications for supermarket and hospital on the site. SPD2 is opportunity to define this area as a car parking for community - rail users, local shops and memorial hall. Provision of parking would revitalise business along Godstone Road as per section 3.3.	Site allocations are a matter for the Local Plan and cannot be made within the SPD.
7.5.45	Forestdale: Representations welcomed intent to improve public spaces but noted there were no specific plans.	Specific development plans are not provided within the SPD as it is a guidance document. It is the intention of the Council to facilitate such improvements where development opportunities afford them.
7.5.46	Shirley: Representations noted it would make sense to expand the tram route along Wickham road.	SPD2 is not a transport plan document. The Croydon Local Implementation Plan sets out proposed improvements to transport provision in the Borough.

## 7.6 Chapter 4: Residential Extensions & Alterations (REAs)

Comments received and responses are divided into two sections below. The first section covers those which result in amendments and the second section covers those that do not result in amendments.

Chapter 4: Responses that result in amendments		
	Comments received	Council response
7.6.1	<p>Representations noted that the SPD provides 3 approaches to character for REAs. There was concern that this was not reflective of Local Plan Policy DM10.1 which requires subservience for development within the grounds of an existing building which is retained. There were also concerns that the 3 approaches were not place specific and a general need to be clearer on how to approach character.</p>	<p>In response to these comments there has been significant rewording and re-ordering to Sections 4.2-4.5 as described in the amendments below. This includes guidance that requires subservience, and revises the previous ‘Subservience, Innovative or Seamless’ <i>character</i> approaches into two <i>design</i> approaches ‘Supplementary’ or ‘Innovative’. It should be noted that the wording within SPD2 reflects and expands upon the Croydon Local Plan policies which require character to be responded to and this allows for innovation and does not necessarily require replication of existing architectural styles.</p> <p><i>Amendment to Paragraph 4.2.1: ‘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 street.’</i></p> <p><i>Amendment to include additional Section 4.3 on 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 4.10 – 4.21) subservience will usually be achieved. However, this should not stifle or discourage high quality design in terms of form, fenestration, materials and detailing, as set out in Approaches to Design (Refer to 4.5).’</i></p>

		<p><i>Amendment to Section 4.5 (formerly 4.4):</i> <i>'4.5.1 Extensions and alterations to an existing dwelling should respond to character (Refer to 4.2) and be subservient in scale (Refer to 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.</i></p> <p><i>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.</i></p> <p><i>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)</i></p> <p><i>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</i></p>
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		<p><i>investment in the design and construction of a proposal due to its bespoke nature.</i></p> <p><i>Figure 4.5b: This innovative extension designed by Alison Brookes Architects enhances the existing dwelling through its contrasting form, use of the highest quality materials and contemporary detailing. (Photo: Paul Riddle).</i></p> <p><i>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.'</i></p> <p>As a result of the above amendments, all references to the previous 'subservient, innovative or seamless' approaches have been removed in the subsequent guidance in Chapter 4.</p>
7.6.2	<p>Representations noted the need for less planning terminology and more appropriate language for the general public.</p>	<p><i>Throughout Chapter 4 phrases have been revised and words such as 'streetscene', 'development' and 'adjoining occupier' have been replaced with 'appearance of/from the street', 'buildings along a street' and 'neighbour' respectively or similar.</i></p>
7.6.3	<p>During consultation it was questioned whether side extensions should be allowed to extend to the same depth as rear extensions – this is currently permissible in most circumstances.</p>	<p><i>Amendment to Paragraph 4.12.1: '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 4.10 Single Storey Rear Extensions.'</i></p> <p><i>Figure 4.12a amended to reflect amended text.</i></p>
7.6.4	<p>During consultation it was questioned whether allowing a 'seamless' approach was appropriate for two-storey side extensions.</p>	<p>Please refer to paragraph 7.6.1 of this statement which has removed the overarching reference to 'seamless'.</p> <p><i>Amendment to Paragraph 4.17: '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 exiting 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.'</i></p>

		<p><i>They do not exceed the eaves and roof ridge line of the existing house.'</i></p>
<p>7.6.5</p>	<p>During consultation it was questioned whether the guidance on roof extensions was too complex and should engage with matters such as party walls.</p>	<p>The guidance on roof extensions has been simplified, including using sections of the guidance in the existing SPD2.</p> <p><i>Amendment to paragraph 4.21.1:              '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 4.21a 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 4.21b 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 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.'</i></p> <p><i>Amendment to include additional figures 4.21a, 4.21b and 4.21g to illustrate above text.</i></p>

7.6.6	Representations commented on the need for guidance on extensions that result in subdividing a property.	<p>Section 4.9 of the SPD provides guidance on extensions that result in subdivisions. The amendment below provides additional signposting in relation to rooftop additions that may result in the creation of new dwellings.</p> <p><i>Amendment to include additional paragraph 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 &amp; Servicing and Landscaping &amp; Provision of Outdoor Amenity Space.'</i></p>
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## 7.7 Consultation

The following comments were received in relation to the consultation process.

	Comments received	Council response
7.7.1	Representations expressed concerns that the consultation did not provide positive examples of how this approach to development had delivered benefits to a community and individual residents, address the rationale for this approach to development or provide indications of planning for health, education and environment.	<p>The SPD is primarily focused on residential design and this was reflected in the material presented at consultation. Built examples shown in SPD2 demonstrate the benefits of housing delivery, improving streetscapes and facilitating wider regeneration as the suburbs continue to grow. The Council plans for health, education and the environment through Local Plan policies, site allocations and the Infrastructure Delivery Plan. Please refer to 7.2.1 of this statement with regards to infrastructure related comments.</p>
7.7.2	Concerned that advertising of the consultation events had not reached a wide enough audience.	<p>The consultation period and events were advertised via:</p> <ul style="list-style-type: none"> <li>• Croydon Council's SPD webpage;</li> <li>• the Your Croydon website;</li> <li>• emails and letters sent to persons on the LDF database (in line with the General Data Protection Regulations update);</li> <li>• an advertisement in The Croydon Guardian;</li> <li>• notices accompanying copies of the draft document at Access Croydon and at each of the Borough's libraries;</li> <li>• postcards providing the Council website address, details of the consultation events and methods for submitting representations at the above locations;</li> <li>• tweets from the Croydon Council Twitter feed; and</li> </ul>

		<ul style="list-style-type: none"> <li>• emails to local Residents Associations (where in line the with General Data Protection Regulations update).</li> </ul>
7.7.3	<p>Expectation at consultation events that:</p> <ul style="list-style-type: none"> <li>• the Head of Planning or Deputy would have been in attendance;</li> <li>• there was a speaker;</li> <li>• there would have been document copies to take away; and</li> <li>• the models were arranged to represent existing places.</li> </ul>	<p>The consultation events were designed to be informal sessions allowing the public to speak to officers about their concerns and engage in the project and evolution of the borough. The events were staffed in rotation between project and senior officers (including the Director for Planning &amp; Strategic Transport and the Head of Spatial Planning).</p> <p>As the document is designed to be used electronically, limited hard copies were provided at the events to be used as an example and allow people to read the document if desired, to reduce printing costs and environmental waste.</p> <p>The wooden housing models used at the consultation events were indicative of housing and street typologies across the borough and were specifically designed so as not to represent an existing location in the borough so as not to single-out certain locations for possible development.</p>
7.7.4	<p>Concerns regarding funding of the project and whether it will achieve the desired results.</p>	<p>The Spatial Planning Suburban Design Guide Team were successful in a bid to the Ministry for Housing, Communities and Local Government (MHCLG) for the Planning Delivery Fund for design quality. The proposal to develop a Design Quality proposal for the borough was assessed against prospectus criteria and was successful in securing a funding allocation for the SPD to help change the quality of new development within the local area.</p> <p>The SPD 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, leading to better quality developments that contribute positively to the Borough. Once adopted it will have weight in planning decisions and is therefore will have effect in achieving the desired results.</p>

### 7.8 Non-SPD2 Comments

A number of comments were received that related to planning, development, intensification, infrastructure or the Council generally. Whilst these comments will not result in amendments as they are not applicable to the content of the SPD, responses to the matters received have been provided below.

	Comments received	Council response
7.8.1	Representations suggested that there should be a limit to the rate of change to assist in controlling development. A number of these representations suggested that no more than up to 5% of homes as the number of suburban intensification developments in any given street or area.	Development strategy and the level an area can accommodate is a Local Plan matter and therefore not applicable for inclusion in the SPD2. Such a control would also be contradictory to the Local Plan housing targets and policies, London Plan and National Policy Planning Framework (NPPF), which seek to support development and boost housing delivery where they accord with the relevant policies.
7.8.2	Representations suggested that the Local Planning Authority should act as guardians of the borough and seek to protect the character of Croydon. Suggestions noted that the rate of change demonstrated in SDP2 does not represent evolution but a rapid change in the borough.	The SPD is guidance to help deliver the required growth in the borough whilst seeking a high quality of design. The development (or change demonstrated) reflects the required development as set out in the London Plan, Local Plan and the broader growth objectives set by the Council.
7.8.3	Concerns that recent planning approvals have been given in isolation and without consideration of residents' concerns or oppositions, preceding and anticipated approvals and the impact on neighbouring properties.	This is a comment about the determination of planning applications rather than the SPD.
7.8.4	Representations suggested that brownfield and other allocated sites throughout the borough should be prioritised for development delivering homes. Subsequent to these sites and only if there is still demonstrable need, should suburban intensification be considered. Some of these representations noted concerns that the SPD conflicts with National Planning Policy on this matter which requires windfall development to be pursued only when all brownfield sites have been allocated.	In accordance with the NPPF and the London Plan the Croydon Local Plan directs development to allocated brown field sites which make up a considerable proportion (circa 2/3) of the sites to meet the development requirements in the Croydon Local Plan over the 20 year period.

7.8.5	Concern that the small sites described in SPD2 typically fail to provide affordable housing.	Affordable housing is an important policy in the Croydon Local Plan and there is a recognised need to provide affordable housing across the borough. However, in line with current government policy that small sites (schemes of 1-9 units) are not required to deliver affordable housing. It is acknowledged that a large portion of the development that would apply to the SPD falls within this threshold. It is not the subject or possible against current government guidance for the SPD to seek that affordable housing is delivered on small sites.
7.8.6	Representations noted concerns that there is not applicable planning policy for 'minor applications', resulting in substandard development in comparison to a major development.	Minor applications, defined as those containing fewer than 10 residential units, are required to meet space standards as prescribed by the London Plan. They are also required to meet relevant design policies (DM10), along with policies regarding daylight and sunlight, the provision of outdoor amenity space and parking, therefore, the quality of these units is comparable to those of a major scheme. Typically, major schemes are required to provide Design & Access Statements to justify the proposed development, as well as the documentation which demonstrates the schemes adherence to relevant planning policies. This recognise that such requirements would be too onerous for minor applications and may impede development on smaller sites which are expected to make a significant contribution to delivering Croydon's housing targets over the next 20 years.
7.8.7	Representations expressed concern for the number of permissions granted for small sites and that many schemes presented to committee appear to be a foregone conclusion for approval.	This is a comment about the determination of planning applications rather than the SPD.
7.8.8	A number of representations noted that residents in certain areas of the borough are receiving letters and approaches from developers and parties interested in purchasing properties who are confident they will secure permission for development	Croydon Council, as the Local Planning Authority (LPA), provides the policy framework for development. All applications made to the LPA are assessed against this policy framework. The Local Planning Authority is in no way party to the business operations of private development companies.
7.8.9	Suggestions were made that the Council should: <ul style="list-style-type: none"> <li>• allow similar access to the planning portal as other boroughs to enable residents to view comments</li> </ul>	This is a comment about the determination of planning applications rather than the SPD.

	<p>and objections made on planning applications;</p> <ul style="list-style-type: none"> <li>publish pre-application advice given to applicants to allow residents to understand the Council’s involvement in schemes.</li> </ul>	
7.8.10	<p>A number of representations expressed concern about Croydon’s housing targets, including:</p> <ul style="list-style-type: none"> <li>the housing supply targets in the New London Plan (Table 4.1) do not reflect a balance between the areas of a local authority and their population densities;</li> <li>they are too high for the suburbs as a result of pressure from the London Plan;</li> <li>the document lacks an explicit statement of the argument for the proposed housing volume required in the borough and how it will sustain Croydon and wider London.</li> </ul>	<p>The Croydon Local Plan 2018 sets a housing target of 32,890 new homes in the borough over the next 20 years. The draft New London Plan increases this target as a result of evidence based reports which support the draft plan and Greater London Authority (GLA) in determining the housing demand required across London boroughs and their capacity to deliver on these demands. These matters are currently being discussed at the Examination into the draft New London Plan.</p>
7.8.11	<p>A number of representations expressed concern that the provision of smaller flats should not count towards the delivery of the borough’s housing targets with equal weight as houses. These presentations expressed the following views to support this opinion:</p> <ul style="list-style-type: none"> <li>The provision of flats impacts communities as their residents fail to integrate into existing communities.</li> <li>Provision of smaller homes will not lead to a satisfactory mix of homes, distorting the housing market and make it difficult for families to afford to live locally.</li> </ul>	<p>The Local Plan sets out the mix of homes required in Strategic Policy SP2.7 and Detailed Policy DM1. This reflects the evidence base that supports the Local Plan and forecasted demand for homes of a certain size. Flats can provide needed smaller homes for younger generations and downsizers; residents within flats are not necessarily transient and can provide as much long-term commitment to a local community as any other form of housing.</p> <p>SPD2 provides design guidance such that those living within flats may be well integrated into a community through the design of their residence that will allow neighbourly relation to develop (Refer to Section 2.29 Driveways, Entrances and New Routes, and Section 2.34 Design of Private &amp; Shared Outdoor Amenity Space).</p>
7.8.12	<p>Representors requested that the Council develop a more collaborative working relationship between Council</p>	<p>The Council’s Spatial Planning service (responsible for producing the Croydon Local Plan 2018 and SPD2) recently consulted on the Statement of Community Involvement</p>

	<p>officers, ward Councillors, residents and developers to achieve positive solutions to the housing crisis.</p>	<p>which sets out how the Council will consult formally on such matters. In addition to this the Planning department has established forums for Residents' Associations and Developers to allow for more informal conversations and engagement.</p>
7.8.13	<p>Representations suggested that developments should be restricted to match planned increases in local infrastructure such as schools, health care, transport and utilities. These representations expressed concerns that the absence of a comprehensive approach towards a significant increase in population is a deficiency and without being identified at this stage and planned for could lead to significant problems amongst the local population and with service providers. It is unclear whether there is money for any needed infrastructure improvements and the requirements of developers to contribute toward infrastructure provision. Guidance should set out how infrastructure is calculated and what mechanism is in place.</p>	<p>Croydon provides a comprehensive framework for infrastructure through the Infrastructure Delivery Plan which informs the Local Plan and is updated on an annual basis in partnership with service providers. This outlines the scale of infrastructure and funding needed, funding available and timeline by which such infrastructure provision should be provided. The SPD is about design and not the suitability of infrastructure to support the development which would be considered against other policies and calculations as part of determining a planning application.</p>
7.8.14	<p>Representations question how residents will be persuaded to rely on public transport, rather than cars, when bus services in several areas have been reduced over recent years.</p>	<p>In the short term TfL have been reducing bus services in parts of Croydon however in the medium to long term TfL and the Mayor of London have committed to improving bus services in Outer London by shifting buses from Central and Inner London (as per Proposal 53 of the Mayor's Transport Strategy). Croydon's Strategic Transport team are also working with TfL Buses to review provision of services in both the north and south of the borough to identify shortfalls in service frequency and coverage and to accommodate expected increases in population and growth. As part of these service reviews we will be looking at what part demand responsive buses can play in serving lower density areas and feeding into higher frequency routes and corridors. Through the Growth Zone funding framework Croydon can secure circa £200 million in funding in improvements for transport which will be used to improve tram services and bus services through increased frequencies and dedicated</p>

		bus priority infrastructure to support faster routes.
7.8.15	Representations raised concerns trains, particularly during rush hour, are at capacity and run limited services to remote parts of the borough. These services will be unable to cope with increased demands.	Croydon is supporting the Network Rail improvements to East Croydon Station and the Brighton Mainline Bottleneck at the Selhurst Triangle which is the largest cause of delays and congestion on the rail routes through Croydon. Once this upgrade has been undertaken then there will be additional capacity available to enable the delivery of the Mayor’s metroisation proposals which will see a huge uplift and improvement in both frequency and journey times to suburban rail services in South London and particularly Croydon.
7.8.16	Representations suggested a need for a collaborative approach with TfL to create a pro-public transport initiative to discourage (where possible) the use of private vehicles and to plan for future public transport infrastructure to support additional development, before development commences.	Croydon has a strong partnership with TfL and works with them on a variety of transport projects including Fiveways Junction, Tramlink extensions, bus priority, Vision Zero and cycling. Croydon is required to work towards delivering the Mayor’s Transport Strategy to meet the objectives to reduce car use, create healthy streets and increase active travel. How we propose to deliver the outcomes and proposals is set out in our third Local Implementation Plan (LIP3).

## **8. Clarifications & Editorial Amendments**

The following minor amendments have been made to address the following issues:

- Provide further clarification to the guidance where it has been deemed necessary
- Edits to phrasing, spelling & grammar
- Edits to images

<b>Section / Paragraph</b>	<b>Clarification / Amendment</b>
Entire document	Reordering of sections / paragraphs / bullets to improve readability where necessary.
Entire document	Spelling and grammar errors.
Entire document	'Material choice' replaced with 'Choice of material'
Chapter 1	Revised title.
1.1.2	Full quote from NPPF provided.
1.2	Footnote to table – clarification.
1.2.4	Clarification.
1.2.7	Clarification.
1.4.1	Rephrasing.
Figure 1.4a	Caption – clarification.
Figure 1.4b	Additional figure.
1.4.9	Clarification.
2.1.2	Reference to Figures 2.1a-e.
2.1.3	Clarification.
Figure 2.1b and 2.1d	Replacement figures.
2.6.3 - 2.6.6	Clarification.
Fig 2.8a	Caption - clarification.
Fig 2.8c & 2.8b	Replacement images & caption.
2.9.7	Clarification.
2.9.17	Clarification & reference to Figure 2.9g
2.9.18	Clarification.
2.9.19	Rephrasing.
2.9.20	Clarification.
Figure 2.9b, e & h	Additional figures.
Figure 2.9f, g & h	Removal of images.
Figure 2.11b & 2.11c	Caption – clarification.
2.11, 2.12, 2.13 & 2.16	Reworded titles.
2.11.1	Clarification.
2.13.1	Clarification & reference to Figure 2.13b.
Figure 2.13c	Removal of image.
2.15.2	Reference to Figure 2.13d.
2.16.1 – 2.16.4	Clarification.
Figure 2.16b	Additional figure.
Figure 2.18a	Additional figure.
Figures 2.18b-e	Captions – clarification.
2.17.1	Clarification.
2.19.2	Rephrasing.
Figure 2.20c	Adjustment.
2.23.4	Rephrasing.
Figure 2.24d	Replacement figure.
Figure 2.26c	Additional figure.
2.28.3	Clarification.
2.29.11	Clarification.
Figure 2.29e	Labelling – clarification.
2.31.2	Clarification.
Figure 2.31c	Removal of image.
2.38.1 & 2.38.2	Amalgamation and clarification.
2.39.2	Rephrasing.

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2.41, 2.42, 2.43 & 2.46	Clarification
2.44	Removal of Case Study.
3.1	Reworded titles.
Figure 3.1a	Caption – clarification.
Figure 3.2f	Clarification.
3.6	Bullet 7 – clarification.
3.6	Bullet 14 – clarification to footnote
3.14	Bullet 2 – clarification.
Figure 4.1b	Replacement figure.
Figure 4.2a, 4.4a - 4.4f	Replacement figures 4.5a & 4.5b.
4.6.1 & 4.6.3	Clarification.
4.9.1	Clarification.
4.10.1	Clarification.
4.14.1	Bullet 3 & 4 – clarification.
4.15	Rephrasing.
Figure 4.16a	Caption – clarification.
4.16.1	Clarification and reference to Figure 4.15b.
Figure 4.16b	Additional figure.
4.17	Rephrasing.
4.21.1	Bullet 9 – clarification.
4.21.2	Rephrasing & clarification.
Figure 4.21c	Replacement image for 4.20a & 4.20b.
Figures 4.21e & 4.21f	Captions – clarification.
4.22.1	Rephrasing.
Figure 4.21a	Replacement figure.
4.25	Clarification.
4.29.2	Clarification.
4.31.2	Clarification
Figure 4.31b	Replacement figure.
Glossary	<p>Addition/amendment to:</p> <ul style="list-style-type: none"> <li>'Conservation areas'</li> <li>'Evolution without significant change'</li> <li>'Flexible bus'</li> <li>'Focussed intensification associated with change of area's local character'</li> <li>'Guided intensification'</li> <li>'Habitable rooms'</li> <li>'Hit and miss brickwork or stone'</li> <li>'High quality design'</li> <li>'Host dwelling'</li> <li>'Incoherent form'</li> <li>'Overbearing'</li> <li>'Self-provided housing'</li> <li>'Unneighbourly windows'</li> </ul>

## 9. Appendix

Photos of the consultation event set-ups:

