

Small Site Design Codes

Consultation 11 February 2022 to 27 March 2022

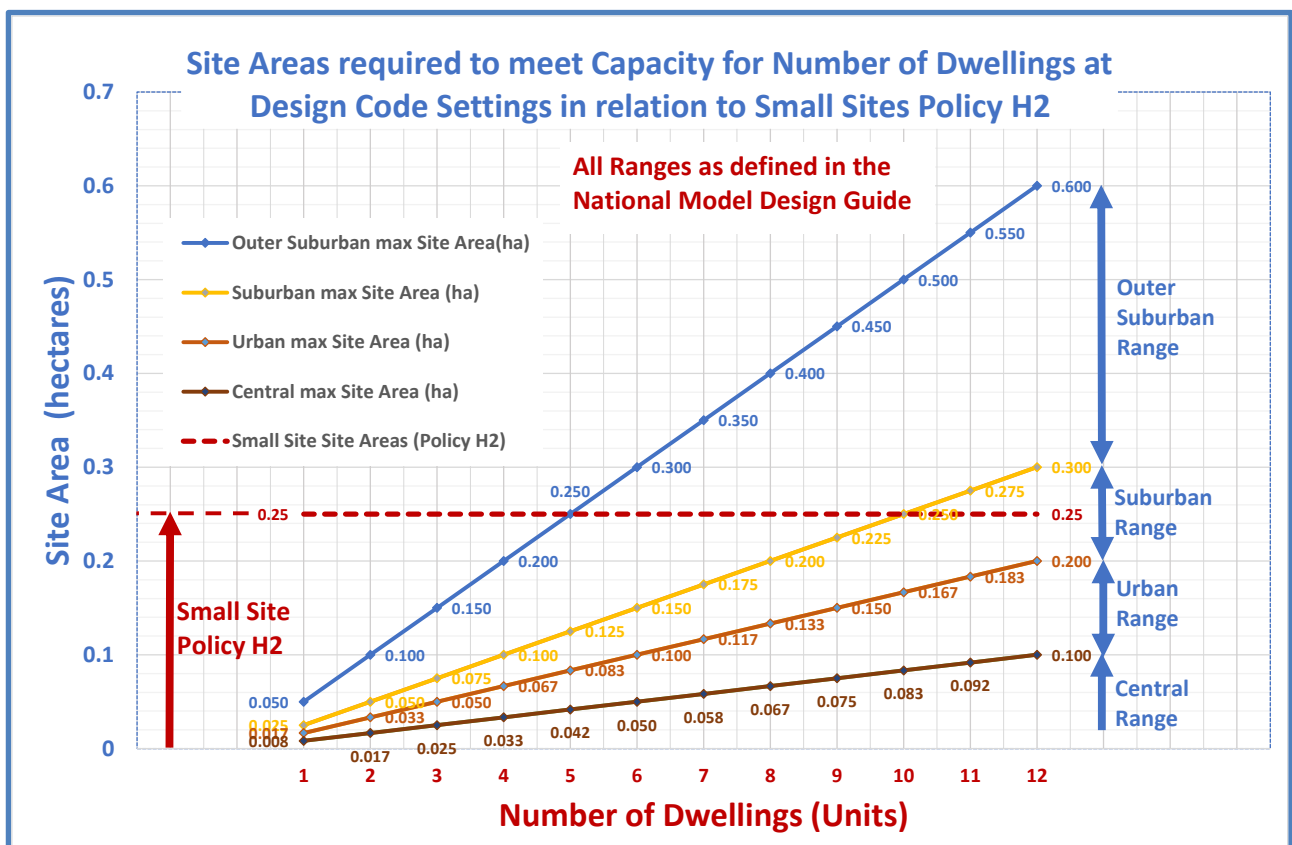
Monks Orchard Residents' Association - Comments

1.1 What are small site design codes?

1.1.2 **Small sites:** are residential developments on sites up to 0.25 hectares.

1.1.3 **Design codes:** are a set of simple, concise, illustrated design requirements that are visual and numerical wherever possible to provide specific, detailed parameters for the physical development of a site or area.

The National Model Design Code & Guidance provides an assessment of “Design Codes” and those terms and definitions should be reflected in this LPG Guidance.



The “Site Capacities” are limited within the “Setting” or “Area Type” range as shown in the graphical illustration.

This graphical illustration indicates the appropriate Site Areas for the incremental number of dwellings (1 to 12 in this illustration) for the “Settings” (Area Types) defined in the National Model Design Code & Guidance published by the Department for Levelling Up, Communities and Housing (DLUCH) January & June 2021.

This assessment and analysis are the basic premise for evaluating Site Capacities for small infill and redevelopments which are normally for the demolition of existing dwellings and the erection of Blocks of Flats up to 9 (nine) dwellings on sites of up to 0.25 hectares.

The demolition of decent quality family Bungalows or detached dwellings with good garden sizes for quality amenity space are a loss to the community and fundamentally changes the character of a locality.

1.1.4 *This guidance only covers area-wide design codes for **incremental intensification** of small sites. Design coding for larger sites, such as site allocations, is detailed in the *Optimising Site Capacity: A Design-led Approach LPG*. Boroughs or neighbourhood planning groups may also choose to develop site-specific briefs or design codes for small sites where necessary but should refer to the guidance above when undertaking this.*

What is the definition of “Incremental Intensification”?

The London Plan Para 4.2.4 states:

Para 4.2.4 Incremental intensification of existing residential areas within PTALs 3-6 or within 800m distance of a station¹ or town centre boundary² is expected to play an important role in contributing towards the housing targets for small sites set out in Table 4.2. This can take a number of forms, such as: new build, infill development, residential conversions, redevelopment or extension of existing buildings, including non-residential buildings and residential garages, where this results in net additional housing provision. These developments should generally be supported where they provide well-designed additional housing to meet London’s needs:

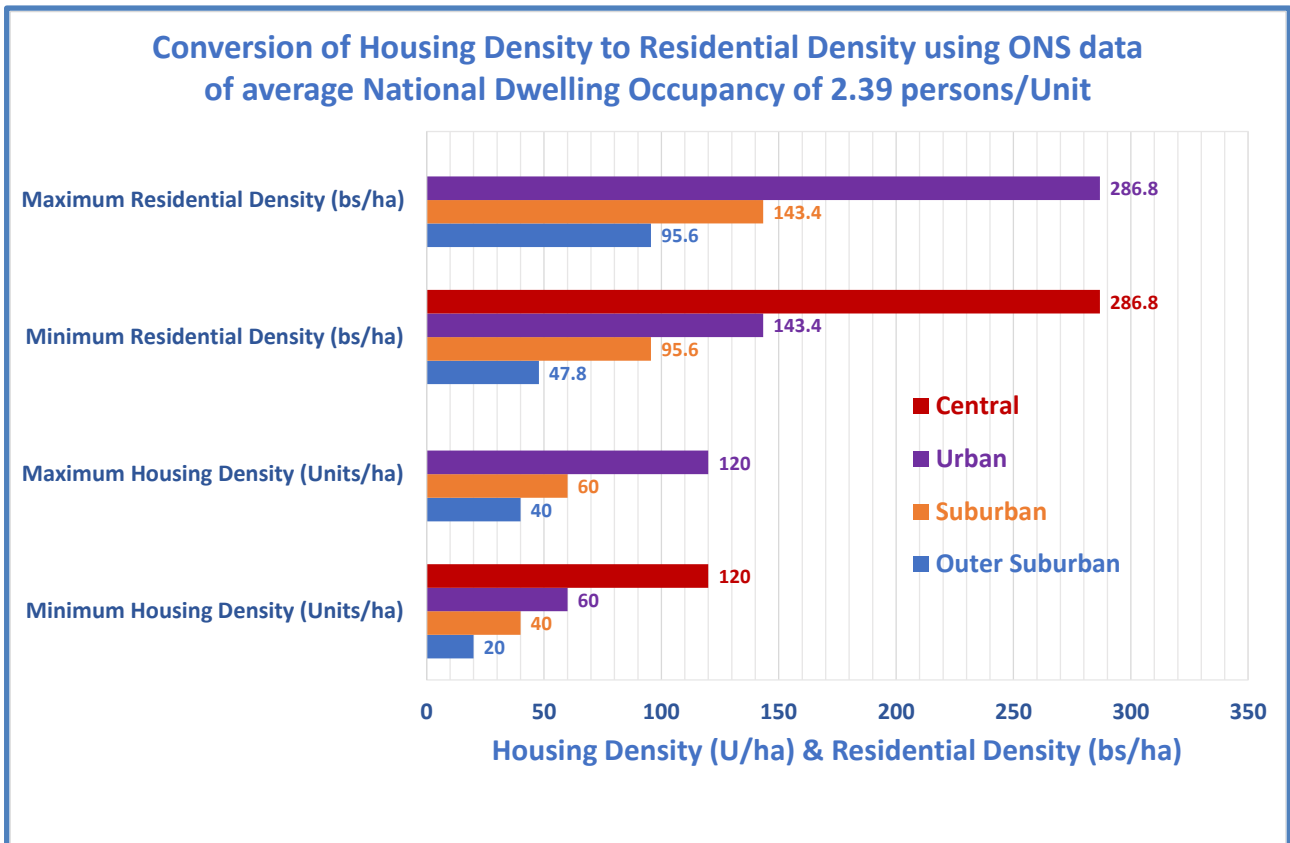
Our interpretation of this statement is that “Incremental Intensification” is **inappropriate** at localities with PTAL <3 and >800m from a Train/Tram Station or District Centre. The “Setting” allows a maximum and minimum Range of Housing Densities but the guidance to the position within the ranges should be that for higher levels of infrastructure provision, Density should tend toward the higher of the Density range and the lower infrastructure provision should be tending toward the lower of the Density range.

The only currently known parameter of infrastructure provision is for Public Transport Accessibility Level (PTAL) which can provide guidance for the Density within the PTAL ranges of 0 to 6. Planning Authorities should provide other parameter definitions for other supporting infrastructure requirements if these supporting infrastructure requirements are to be considered as limiting factors for Residential Density.

It should be acknowledged that it is people that require Public transport Accessibility, NOT dwellings or habitable rooms, so the parameter of housing Density (Units/ha) is inappropriate for comparison with provision of Public Transport Accessibility and the units for assessment should be Residential Density in terms of bedspaces/ha.

¹ Tube, rail, DLR or tram station

² District, major, metropolitan and international town centres



This graphical illustration shows the conversion from Units per hectare to Persons per hectare based upon the National Average occupants per Unit³

2.1 Identification of character types

2.1.1 Small site area-wide design codes should use identified ‘character types’ as a basis for the application of the design codes. The process of determining these character types should be carried out during a borough’s characterisation assessment and is detailed in the Characterisation and Growth Strategy LPG.

The National Model Design Code and Guidance introduces the “Settings” for “Outer Suburban,” “Suburban,” “Urban,” and “Central” designations and at Part 1 Coding, Figure 10 page 14 provides further parameters to define these “settings”.

Figure 2.1 Example map of character types

Character types (also known as Area types):

The character Types (also known as Area Types) are also known as “Settings” (which is confusing!) and are completely different from the Settings as defined in the National Model Design Code & Guidance and therefore cannot be used interchangeable which does not help to define “Area Types” or “Settings” or give common guidance terminology to both applicants, Planning Officers, and community groups.

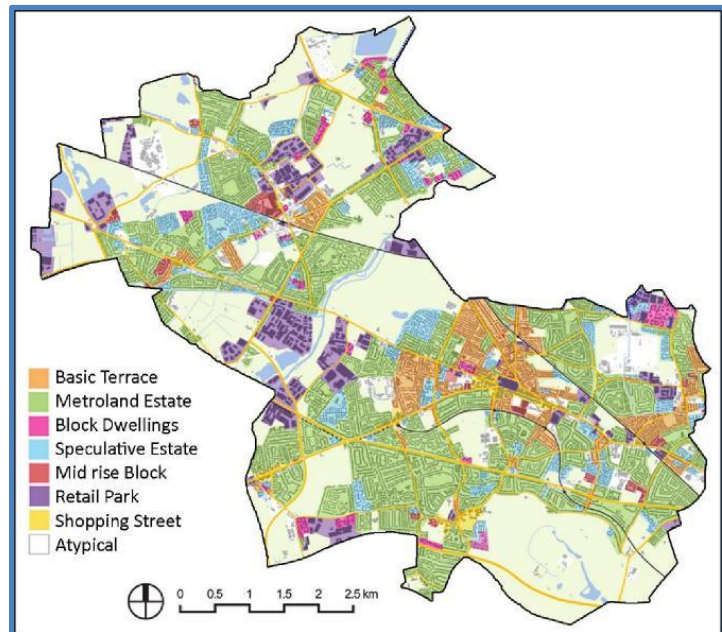
³ <https://www.statista.com/statistics/295551/average-household-size-in-the-uk/>



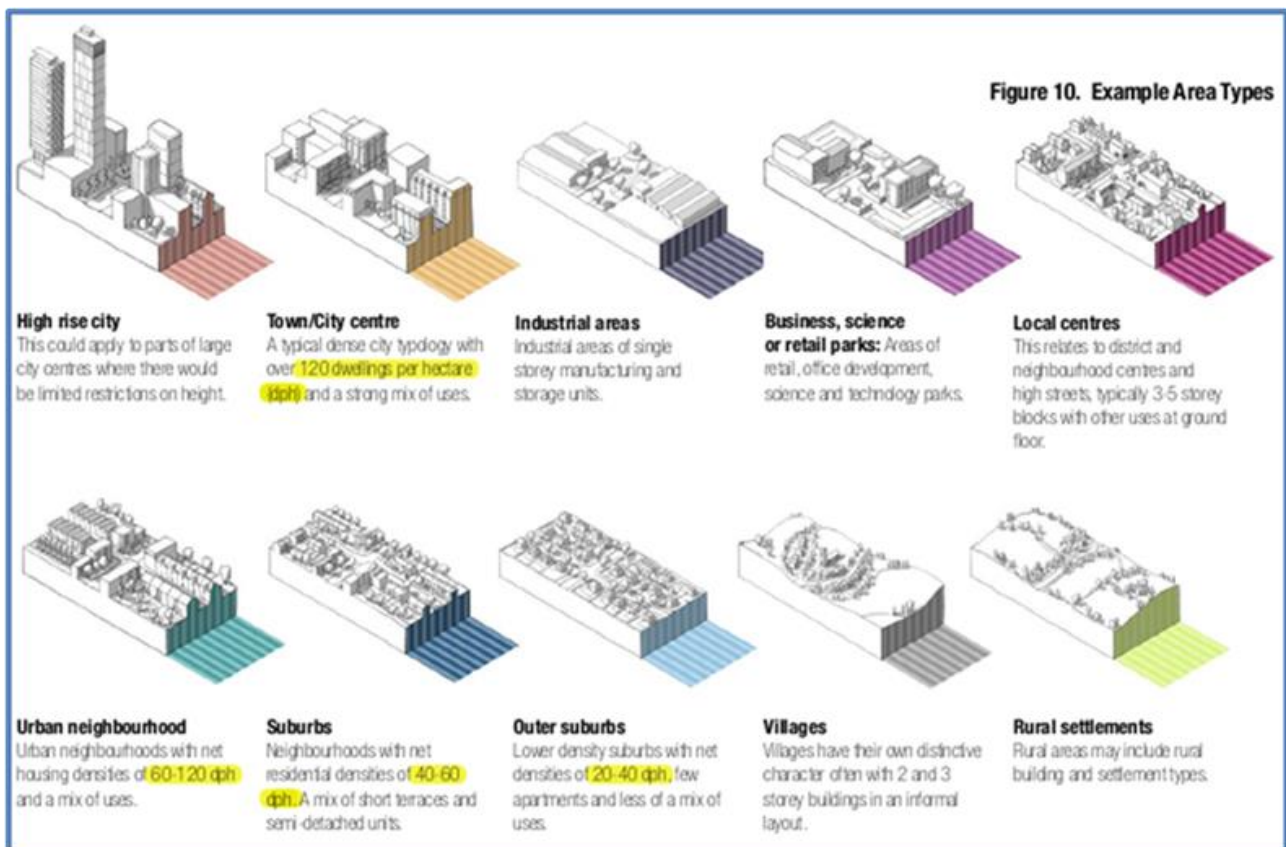
The Figure 2.1 List of Character Types:

- Basic Terrace
- Metroland Estate
- Block Dwellings
- Speculative Estate
- Mid Rise Block
- Retail Park
- Shopping Street
- Atypical

These “Area Types” are completely different from the “Settings,” or “Area Types” listed in the National Model Design Code & Guidance.



This confusion by the professionals does not help to define the local character of an area!



National Model Design Code Part 1 Coding, Figure 10 page 14

2.2 Forms of incremental housing development conditions

2.2.1 Boroughs and neighbourhood planning groups should choose to prioritise coding in areas for which the development of small sites is most likely to come forward. **Incremental intensification** of existing residential areas with higher connectivity - due to proximity to transport infrastructure or town centres - is expected to play an important role in the delivery of small site development. As such, boroughs and neighbourhood planning groups are advised to prioritise design coding for character types located in or near town centres with higher PTAL areas (3-6 in particular).

London Plan para 4.2.4 infers “Incremental Intensification” is inappropriate at PTALs <3 and >800m from a Tram/Train Station or District Centre (as stated above).

However, without a definition of what “Incremental Intensification” actually physically means, the phrase is meaningless and unhelpful for the purposes of practical implementation of policy and guidance.

The Croydon Local Plan Review has suggested areas of local redevelopments in residential areas of PTALS <3 and >800m from tram/train Station or District Centres be considered for “Gentle” densification, but again without definition of what “Gentle” actually means practically, the designation is meaningless and unhelpful.

2.2.2 Figure 2.3 and Figure 2.4 show some common opportunities for incremental housing development within a terrace, linear block, and semi-detached housing context.

- **Street-facing conditions:** site with direct access to the street.
- **High street conditions:** site situated on or near a shopping street.
- **Backland conditions:** site behind development, commonly underused rear land.
- **Residential extensions:** extension of an existing development or dwelling to provide additional residential accommodation. This may be in the form of an upward, side, or back extension

Street Facing conditions:

This would seem to be residential with minimum set-back building line with amenity space mainly in the form of rear gardens. The “Area Type” would ostensibly be more densely packed terraced accommodation in areas close to central conurbations.

Redevelopment of single dwellings in such an “Area Type” would be rare as it would impact severely on the structural stability of adjacent dwellings in the terraced block (see figure 2.3). Such redevelopment would likely require the whole block or a proportion of the Block to be redeveloped.

The Density of the redevelopment would then be dependent on the level of supporting infrastructure for the area at the range appropriate for the “Setting”.

Sites that do not have a street frontage

2.5.1 Backland sites are sites that do not have a street frontage or where direct access to the street is limited. Among others, they include residential garages that are located behind development and estate infill in areas that are not street-facing.



Backland Developments require access and there are significant issues that require definition to ensure development could be acceptable.

There are therefore a number of considerations which require clarification for applicants for Backland Developments.

- a) Ownership of the access drive if used by existing Residents along the street to gain access to their rear garages or for legal rear access to their properties.
- b) The width and surface condition of the access and provision of a turning head within the site for ingress and egress of vehicles.
- c) The maximum length of the access route from the highway to the backland development should be specified;
- d) The 'minimum' Length of the Access (Driveway) Route from the public highway and public footpath to the Backland Development for which any greater length would require:
 - i. kerbs both sides of the access driveway.
 - ii. A footpath for pedestrians, pushchairs and wheelchair users.
 - iii. A requirement for vehicle passing bay.
 - iv. Special consideration for wheelchair accessibility to avoid an oncoming vehicle.
- e) The minimum width of the access driveway between kerbs (kerb to kerb) the full length of the driveway should be specified;
- f) The Minimum distance over the length of the access drive or spacing, between passing bays for vehicles;
- g) The structural strength specification of the driveway to sustain regular heavy goods vehicles, Refuse vehicles or Fire Tenders and emergency vehicles.
- h) The minimum length of access driveways without a turning head (in which case vehicles would need to reverse out across the public footpath with limited sight lines – unless reversing into the access driveway).
- i) The minimum distance from the furthest development dwelling to the nearest Fire Hydrant. (if over 100m a new nearer Fire Hydrant should be required for the Development).
- j) The Swept path illustration should be provided for heavy goods, Refuse, and emergency vehicles from the highway (road width restriction) turning circle into the access driveway. The full width of the highway would be needed to gain access; therefore, "Double Yellow Line" parking restrictions would be necessary for about 30m both sides of the highway either side of the entrance to the access drive to ensure the full width of the road is available for negotiating access.

The Density for Backland development would reflect the existing "Setting" Range and depending upon the supporting infrastructure, whether at the high or low end of the "Setting" Density range.

2.7 Identify and map small sites for development

No Comment

2.8 Coding coverage

Area Design Codes

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for a better community**



Coding Options (What Area level of Coding should we consider for assessment.

- 1 The Place (Too big)
- 2 Wards (Possibly too big)
- 3 Residents' Association Areas
- 4 Individual Blocks of similar property types
- 5 Post Code Group Areas
- 6 Individual Post Code Areas
- 7 Blocks of Streets
- 8 Individual Streets
- 9 Individual Sites

Residential Site Capacities:

Site relationships:

- a) The Site Area
- b) The Site's supporting infrastructure, Public Transport, GPs & Schools.
- c) The Site's local setting (village, outer-suburban, suburban, urban or central)
- d) Number of units per hectare (units/ha)
- e) Number of habitable rooms per hectare (hr/ha) – usually existing not known
- f) Number of bedrooms per hectare (Bedrooms/ha) – again, existing usually not known
- g) Number of bedspaces per hectare (Bedspaces/ha) – Can be obtained from local data
- h) The Gross Internal (and External) Area (GIA) in m². – existing not known
- i) The Floor Area Ratio & Total Gross Internal Area of all floors / site area) – existing not known
- j) The Site Coverage Ratio (Gross External (Internal) Area of ground floors /site area) – existing not known
- k) The maximum height in metres above ground level of each building
- l) Public Transport Connectivity (PTAL) (relationship with population e.g., bedspaces/ha)
- m) Play Space Allocation for Children (below 10 Units as well as 10 Units and above)
- n) Communal Open amenity Space for occupants of blocks of Flats (Adult occupants) in terms of area per adult occupant.

Ranges of Housing Densities for consideration:

- 1 Village (rural) Low dispersed densities large site areas and low Floor Area Ratio (FAR).
- 2 Outer Suburban – Design Code Housing Density 20 to 40 Units/ha & FAR <0.5
- 3 Suburban - Design Code Housing Density 40 to 60 Units/ha & FAR <0.5
- 4 Urban - Design Code Housing Density 60 to 120 Units/ha & FAR <1.0
- 5 Central - Design Code Housing Density >120 Units/ha & FAR <2

Parameters for each Code Designation:

Housing Densities:

Allowable incremental increase in Housing Density (above existing)?

- We need to define the parameter in terms of:

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- Units/ha (Housing)
- Bedspaces/ha (Residential)
- Percentage incremental increase?
- Unit increase (Housing Units and Population increase)
- Residential Densities Existing
- Allowable incremental increase in Residential Density (above existing)
- Floor Area Ratios & Floor Coverage Ratio FIA/Site Area & GEA/Site Area Existing (Applicants normally give Gross Internal Area)
- Allowable incremental increase in Floor Area Ratio GIA/Site Area & GEA/Site Area (above existing)
- Average Set Back of Building Line of existing
- Average Height of Existing Housing stock
- Play Space Allocation for Children (per child)
- Communal Open Space Allocation for Adults (per adult)
- Allowable incremental increase in height of development above existing
- Public Transport Accessibility Level & Forecast.
- Residential and Housing Densities should be related to the local available PTAL – How?

Predominant Housing Types:

- a) Bungalows detached or semi-detached
- b) Houses Detached or semi-detached
- c) Flats (up to 9 Dwellings)
- d) Flats (10 units and above)
- e) Open Space Areas (Relationship to Population Density for the code)
- f) Other Infrastructure requirements.

5.1 Monitoring of design codes

- 5.1.1 Once adopted, a borough or neighbourhood planning groups' coding plan and design codes should be made publicly available. Boroughs and neighbourhood planning groups are encouraged to display these on interactive web-based maps which link the relevant design codes to each area of the coding plan. Four example design codes are shown in Appendix 2.
- 5.1.2 Design codes should be periodically reviewed, and their effectiveness assessed, as part of the development plan monitoring and evaluation process. It is likely that elements of a design code may have to be subsequently amended to reflect any issues or learning that has arisen since adoption.

5.2 Design code enforcement and compliance

- 5.2.1 The planning authority should monitor the compliance of their codes and are encouraged to develop a compliance tracker for each of their design codes. These can be useful when assessing the compliance of a design code as well as help to enforce it. These trackers or checklists can include a tick box approach where the different design coding elements are monitored.



To ensure compliance to all parameters of the Local Design Code, each planning application should be validated to ensure ALL parameters requested are listed and defined in the application documentation or Design and Access Statement prior to acceptance of the planning application by the LPA.

If Developers do not meet this requirement, the application cannot be assessed, and the application should NOT be validated or accepted.

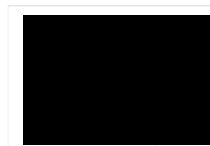
END

Kind regards

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