

Small Sites Design Codes LPG

The Small Site Design Codes LPG provides an overview of the four-stage process of preparing design codes for small sites as well as providing several example small site design codes.

During the process of identifying Character Types (in accordance with the guidance set out in the Characterisation and Growth LPG, which LB Southwark have responded to separately) urban conditions which present an opportunity for incremental housing development should be identified. These conditions include (1) street facing conditions, such as residential street infill locations such as underutilised parking, streetscape gaps, end of terrace or corner sites; (2) high street conditions, such as single storey units which break multi-storey street frontages or surface carparks; (3) back land conditions, such as garages, back gardens or estate infill locations; (4) residential extensions, which includes upwards, side and rear extensions to residential dwellings and blocks. We support the identification and coding of small sites suitable for incremental residential densification in principle. However, we feel that the use of the term 'condition' rather than simply 'location' will cause confusion for the public who are expected to consult on coding for these types of sites. We would suggest that the terms 'street-facing locations', 'high street locations', and 'back land locations' should be used throughout the document instead.

The guidance suggests that small sites exemplifying these conditions should be identified during the characterisation process and made public on an accessible 'live' digital map. We generally support the use of digital tools during the planning process and already use a digital map to make planning policy, plans and applications available to the public. However, we are concerned that the growing emphasis on digitisation will incur a degree of exclusion and presents a significant challenge to equality of participation in the design coding process for our communities and residents, especially where specialist software would be required. Chapter 3 of the guidance outlines that after the area characterisation and identification of small sites which are appropriate for incremental development has been undertaken, the design vision and principles for the design codes should be identified and compiled into a 'small sites coding plan'. The coding plan should take the form of a map and should also be presented in the form of a publicly accessible 'live' digital map. This again raises concerns regarding digital exclusion.

The coding plan process should draw upon the findings from area characterisations as well as public engagement and consultation. Given the highly localised and granular nature of design codes (particularly for smaller sites), we feel that targeted consultation with members of the public most directly affected by the code for a particular area would be most beneficial, rather than borough-wide consultations. As such, we would suggest that sub-areas should be identified during the area characterisation studies that can be utilised to hold consultations at smaller scales. Further guidance and case studies for how smaller scale consultations (as well as code testing workshops which are suggested briefly in section 4.1.4) could be undertaken would be helpful and would allow boroughs to better understand the resourcing requirements these public consultations will entail. Our concerns regarding the levels of extra resource required to undertake such consultations is dealt with in greater detail below.

Chapter 4 of the guidance provides a helpful guide on producing design code content that is rules-based and represented graphically. This guidance, especially when combined with the example design codes presented in Appendix 2 provides a helpful account of what features of development a design code could take into consideration (e.g., building / roof lines, windows, materials, front-to-front and back-to-back distances, landscaping, materials), as well as examples of how to represent the codes graphically and how to utilise the appropriate terminology (i.e., must, should, could). While the examples provided are not exhaustive, they are a good starting point and should be helpful for boroughs during the small sites design code creation process. Examples of poor practice, as well as case studies of less successful design coding for small sites would also be helpful and should be included in the guidance.

A paragraph should be included in the guidance explaining that each case is decided on its own merits and would be subject to other policies such as transport, amenity, space standards, accessibility, s106 and CIL etc. Some of the design coding suggestions made in the guidance would fail to meet the requirements of other policies or basic amenity requirements. For example, end of terrace (street facing) small sites that come forward for development in Southwark often fail to meet amenity requirements such as outdoor space, overlooking of neighbours or use of front gardens as amenity space requiring tall blank boundary walls. As such, we feel the guidance should include some more detailed contextual information on how small sites design codes will sit alongside existing planning policies and requirements – this could be included as a preamble paragraph to chapter 2.

Some further detail would be welcome in the guidance on small sites design codes. A few considerations which we feel should be included are listed below, however this list is not exhaustive:

- Codes for small site development in back land and street facing locations should make it clear that the code is for separate dwellings (not annexes to existing properties) and applies only to housing (not commercial or community uses);
- High street residential development should have a street facing door and should not compromise similar development on other sites (including those adjacent);
- Podium style blocks with central first floor amenity space for high street locations can be acceptable and should be considered in the guidance;
- Residential extensions can include dormer extensions, and this should be included in the guidance;
- Small sites design codes, particularly for residential extensions, will not be applicable within a conservation area or within the curtilage of a listed building.

A significant concern that underpins much of the guidance provided in this document is the level of upskilling, resourcing and increased capacity that will be required to identify and map appropriate small sites, carry out consultations and code testing, produce design code content and carry out monitoring tasks. This resourcing will be additional to the significant resourcing that will be required for the borough-wide characterisation process, as identified in our response to the Characterisation and Growth LPG. With regards to public consultation in particular, significant investment of resources and capacity will be required to ensure that the local communities understand the new specialist terminology, software, and graphical approach to design coding to facilitate a successful consultation. There is an additional concern that Southwark residents have been extensively consulted recently on our new local

plan, Heritage SPD and Statement of Community Involvement and that there will be an element of 'information overload' or 'consultation fatigue' amongst our communities as a result.