
Dear

Many thank for arranging and hosting such an interesting discussion today.

Through the course of the meeting, I jotted notes of some thoughts that came to mind, not all of which I shared for fear of monopolising the discussion!

References to character, and the characterisation document, should acknowledge that pockets of weakness can exist within areas of otherwise strong or dominant character. Eg, the kinks and disconnects in an otherwise homogenous (sub)urban fabric can impact negatively on the coherence of the whole, but the design solution that works for that local lacuna may not be one which replicates the dominant character – it may of necessity be quite different.

The other note of caution when promoting a character led approach is that much of what we see in our urban areas is not the product of conscious design, but of the market forces which influenced the original developer and the random choices of individual owners, especially in the exercise of permitted development rights. Policy officers and development control officers can interpret this reality in two quite different ways:

Within aspirational / policy character documents, there can be a tendency to focus on the ideal image of what we imagine these places 'should' look like, ignoring the reality that local character by now thoroughly reflects the collective impact of decisions of which we, as design professionals, may disapprove (eg haphazard exercise of PD rights).

By contrast with these aspirational documents, development management officers can define character too narrowly by reference only to what already exists in the immediate vicinity of the site – and can fall into the trap of deeming every existing feature, positive, neutral and negative - as contributing to character. This surrenders our ability to make positive decisions about the future to the random actions of individual owners in the past.

A better standard to uphold in considering character at the micro level may be to ask what a lay person may reasonably expect to encounter in an area of broadly similar character, even if this diverges from the specifics encountered on the application site.

Prescriptive technical guidance or not? A higher degree of prescriptiveness is sometimes useful as a means of establishing some key parameters that should be broadly acceptable even in the context of a relatively ordinary design proposal, with wording to allow divergence in the case of exceptionally well designed solutions such as the Moray Mews example cited in the discussion. Prescriptiveness can also be a positive enabler – for example, Croydon specifically states that the amenity value of the first 10m of a garden should receive a higher level of protection, which in turn frees the hand to propose schemes which for example loom a little higher over part of a garden remote from the neighbouring house. In the absence of such guidance, development management officers may feel compelled to oppose any proposal which has a negative impact on any part of any neighbouring garden.

When are supplementary consultants' reports needed? The proportionality of demanding a range of specialist consultant reports on small sites needs to be very carefully considered. There can be a tendency, particularly amongst less experienced officers, to seek reams of reports in circumstances which a more experienced hand would intuitively understand to be unnecessary. The 25' guidance on daylight-sunlight is therefore quite useful, as it can be used to strengthen the hand of officers and applicants against neighbours (and the councillors drafted in to object on their behalf) who cry foul about daylight-sunlight impacts against developments that clearly do not impact negatively. Similar guidance in respect of, for example, existing trees could usefully reflect the fact that the most commonly encountered suburban hedge/tree – the leylandii cypress, is of nil ecological value without necessitating a bespoke arboricultural report each time to verify same!

D&A Statement template: The proposed template is exactly how I, as an architect, used to prepare a D&A. But are you sure this is what officers making the decision actually need or want? Over time, the D&As we submit have evolved to basically reflect the format of the planners own report – structuring information in a way that aligns specifically with policies. At the moment, the officer trying to determine whether or not a given proposal complies with each of Merton's specific policies would have to trawl through several different parts of the D&A as currently structured to find the information they need. Aligning sub-sections with specific policies, or with the way that applications are broken up for internal consultation with different departments, could be more convenient. If offering a template, you might as well make your own lives easier!

Many thanks again for an excellent consultation and best of luck with the rest of the process.

Kind regards

Director
Innovative Infill

