

Representation Form for the Croydon Local Plan Review 2019:

		Personal Details
1.	Representation Number:	MORA #023
2.	Title	Mr
	First Name	Derek
	Last Name	Ritson
	Profession	Retired – Former Communications Engineer I. Eng. M.I.E.T.
3.	Representative	Planning Adviser Executive Committee Member
4.	Organisation	Monks Orchard Residents' Association
5.	Address Line 1	██████████
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6.	Email Address	planning@mo-ra.co

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Name or organisation: **Monks Orchard Residents' Association**

7. To which part of the Croydon Local Plan Review does this representation relate?

Croydon Local Plan Review:

CLP review – CLP2 Clarifications

Policy

SP4

Option

All

Figure/Table

N/A

8. Do you think that the proposed policy or part of the plan meets the objectively assessed development and infrastructure requirements for Croydon (and the unmet needs of neighbouring authorities) as defined in **NPPF (2019) para 16**?

Yes

No

9. If No

Which sub paragraph of para 16 does the policy **NOT meet NPPF Para 16**.

Par a)

Para b)

Para c)

Para d)

Para e)

Para f)

The following comments and clarifications relate to the current Croydon Local Plan (2018) which requires clarification in order to meet NPPF (2018/19) Para 16 - Plan Making:

Plan Making

16. Plans should:

- a) be prepared with the objective of contributing to the achievement of sustainable development¹⁰;
- b) be prepared positively, in a way that is aspirational but deliverable;
- c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- e) be accessible through the use of digital tools to assist public involvement and policy presentation; and
- f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

CLP2	CLP2 Policy Text	CLP2 Issues or clarification for CLP3
Policy SP4	Urban Design & Local Character	<p>The responses from Director Planning and Development Management is that planning applications are all different and that's why the policies are general.</p> <p>Our response to this is that it is because all planning applications are different that is why we need specific policies to determine the acceptability or otherwise of a proposal.</p> <p>General descriptions cannot be the grounds for a refusal as they are too subjective.</p>
DM10	<p>The following policies DM10.1 to DM10.10 apply in circumstances other than those where intensification policies (DM10.11) and place-specific policies (DM34 to DM49 and Table 11.1) specify otherwise and will be interpreted with reference to the description of each of the Places of Croydon set out in the introduction to each policy DM34 to DM49 and in the Council's Borough Character Appraisal and by reference to Table 6.5.</p>	<p>See New NPPF paragraph 16 - Plans should:</p> <p>c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;</p> <p>d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;</p> <p>e) be accessible through the use of digital tools to assist public involvement and policy presentation; and ...</p>
DM10.1	<p>DM10.1 Proposals should be of high quality and, whilst seeking to achieve a minimum height of 3 storeys, should respect:</p> <p>a. The development pattern, layout and siting;</p> <p>b. The scale, height, massing, and density;</p> <p>c. The appearance, existing materials and built and natural features of the surrounding area; the Place of Croydon in which it is located.</p> <p>Where an extension or alteration is proposed, adherence to Supplementary Planning Document 2 Residential Extensions and Alterations or equivalent will be encouraged to aid compliance with the policies contained in the Local Plan.</p> <p>Where a conversion or house in multiple occupation is proposed the Council will also consider the effects of noise, refuse</p>	<p>Where a conversion or house in multiple occupation is proposed the Council (has sought borough wide Article 4 Directive revoking Permitted Development for Change of use from C3 dwelling to C4 HMO's and) will also consider any appropriate planning policies and the effects of noise,</p> <p>a) Add "to reflect local character"</p> <p>b) The scale, height, massing, and density; as defined by the setting and the London Plan Policy 3.4 Density Matrix or alternative if the density matrix is removed (as Required by NPPF para 16d) & para 122 Achieving appropriate densities) - otherwise how? Not specified in CLP2?)</p> <p>NPPF para 122 - Achieving appropriate densities</p>

	<p>collection and additional car parking on the character of an area. For this reason, the Council will seek proposals to incorporate parking within the rear, to the side or underneath building.</p> <p>In the case of development in the grounds of an existing building which is retained, development shall be subservient to that building. The council will take into account cumulative impact.</p>	<p>122. Planning policies and decisions should support development that makes efficient use of land, taking into account:</p> <p>c) <u>the availability and capacity of infrastructure and services</u> – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;</p> <p>d) the desirability of <u>maintaining an area’s prevailing character and setting (including residential gardens)</u>, or of promoting regeneration and change; and</p> <p>e) the importance of securing well-designed, attractive and healthy places.</p> <p>How will the council take into account “<u>cumulative impact</u>”? There is no known current mechanism to establish “<u>cumulative impact</u>”? What are the parameters of “<u>cumulative impact</u>”?</p>
DM10.2	<p>Proposals should create clear, well defined and designed public and private spaces. The Council will only consider parking within the forecourt of buildings in locations where the forecourt parking would not cause undue harm to the character or setting of the building and where forecourts are large enough to accommodate parking and sufficient screening without the vehicle encroaching on the public highway. The Council will support proposals that incorporate cycle parking within the building envelope, in a safe, secure, convenient and well-lit location. Failing that, the council will require cycle parking to be located within safe, secure, well-lit and conveniently located weather-proof shelters unobtrusively located within the setting of the building.</p>	<p>Define the allocation of “<u>well defined public and private spaces</u>” in terms of <u>allocation per hectare per person</u> for private and how much for public – in relation to site area? (see NPPF para 16 d)</p> <p>Definition of “<u>undue harm</u>” to the character – as Planning Case Officers do not seem to consider any issue would cause “<u>harm</u>” to the local area! (NPPF para 16 d)</p> <p>How large is “<u>large enough</u>”? how high and how opaque is sufficient screening? See NPPF para 16 d)</p> <p>Define the parameters of “<u>convenient</u>” as this is a subjective adjective (NPPF para 16 d) (i.e. what distance and what incline (gradient) acceptable</p>

		<p>What are the parameters of luminous flux to define “<u>well-lit</u>”? Define “Light intensity at source and degradation over what distance from the source”?</p> <p><i>Conveniently located?</i> Too subjective i.e. within what distance from an entrance to a dwelling?</p> <p>Without definitions, these policies are meaningless as it is not possible to refuse an application on any of these grounds as there is no definition of the acceptability or otherwise of the parameter!</p> <p>See new NPPF para 16 d).</p> <p>(All these parameters should have defined tolerances + or – or % except where it states a minimum requirement).</p>
DM10.3	The Council will seek to support proposals that restore and incorporate historic street furniture within the development.	No Comment
DM10.4	<p>All proposals for new residential development will need to provide private amenity space that.</p> <ol style="list-style-type: none"> Is of high-quality design, and enhances and respects the local character; Provides functional space (the minimum width and depth of balconies should be 1.5m); Provides a minimum amount of private amenity space of 5m² per 1-2-person unit and an extra 1m² per extra occupant thereafter; All flatted development and developments of 10 or more houses must provide a minimum of 10m² per child of new play space, calculated using the Mayor of London’s population yield calculator and as a set out in Table 6.2 below. The calculation will be 	<ol style="list-style-type: none"> Define high-quality? Use relevant BS Kitemark categories. What is this “<i>Functional space</i>”? (in addition to c. private amenity space) (1.5 x 1.5 = 2.25m² minimum). Table 6.2 – Why only 10 or more – why not ALL; <p>Why differentiation between Minimum play space for children (for affordable or social rented housing) and those Minimum play space (for private market or intermediate shared ownership housing). <u>Why a difference. This is inappropriate (Reference Equalities Commission).</u></p> <ol style="list-style-type: none"> calculating “<i>communal open space</i>” to what parameters – should be an allocation be based upon i.e. number of occupants to be housed in the development or a relationship with the site area. See NPPF para 16 d) (parameter = ha/resident).

	<p>based on all the equivalent of all units being for affordable or social rent unless as signed Section 106 Agreement states otherwise, or an agreement in principle has been reached by the point of determination of any planning application on the amount of affordable housing to be provided. When calculating the amount of private and communal open space to be provided, footpaths, driveways, front gardens, vehicle circulation areas, car and cycle parking areas and refuse areas should be excluded; and</p> <p>e. In the case of development in the grounds of an existing building which is retained, a minimum length of 10m and no less than half or 200m² (whichever is the smaller) of the existing garden area is retained for the host property, after the subdivision of the garden.</p> <p>Adherence with Supplementary Planning Document No.3: Designing for Community Safety or equivalent will be encouraged to aid compliance with the policies contained with the Local Plan.</p>	<p>e) minimum length of 10m and add “over the full width of the retained garden.” <i>The retained garden after partitioning should be not less than 200m².</i></p> <p><i>The retained garden be it front or rear (but NOT both). It is not appropriate to consider other garden areas (i.e. unpartitioned garden) can be added to the retained partitioned area to increase the total area to over 200m².</i></p> <p><i>The Policy states the “retained area after partitioning”. Check 20-22 The Glade Complaint Stage 1 & Stage 2</i> http://www.mo-ra.co/planning/planning-report-may-2019/#2022TheGlade</p> <p><i>The Policy states the “retained area after partitioning”. Check 20-22 The Glade Complaint Stage 1 & Stage 2</i> http://www.mo-ra.co/planning/planning-report-may-2019/#2022TheGlade</p>
<p>DM10.5</p>	<p>In addition to the provision of private amenity space, proposals for new flatted development and major housing schemes will also need to incorporate high quality communal outdoor amenity space that is designed to be flexible, multifunctional, accessible and inclusive.</p>	<p>“will also need to incorporate high quality communal outdoor amenity space that is designed to be flexible, multifunctional, accessible and inclusive.”</p> <p>These are ALL subjective adjectives which require definition – the minimum definition is the area of “Communal Open Space” measured as square metres or hectares per occupant of the proposed development. (e.g. ha/1000 occupants). Otherwise DM10.5 is meaningless!</p>
<p>DM10.6</p>	<p>The Council will support proposals for development that ensure that;</p>	<p>a) Define the parameters that are required for protection of amenity of occupiers of adjoining buildings.</p>

	<ul style="list-style-type: none"> a. The amenity of the occupiers of adjoining buildings are protected; and that b. They do not result in direct overlooking at close range or habitable rooms in main rear or private elevations; and that c. They do not result in direct overlooking of private outdoor space (with the exception of communal open space) within 10m perpendicular to the rear elevation of a dwelling; and that d. Provide adequate sunlight and daylight to potential future occupants; and that e. They do not result in significant loss of existing sunlight or daylight levels of adjoining occupiers. 	<ul style="list-style-type: none"> b) Define minimum overlooking distances in metres between facing habitable rooms and at 45° angle overlooking distance in metres. (Was a minimum of 18-21m perpendicular but how could a tolerance be a minimum?) c) Clarify whether this is direct overlooking to an adjacent property and why only the rear elevation? d) Define adequate sunlight & daylight? Too subjective daylight/sunlight for how many hours of the day for how many days of the year? Or other measure? e) What is “significant” loss? Definition. What would not be acceptable?
<p>DM10.7</p>	<p>To create a high-quality built environment, proposals should demonstrate that:</p> <ul style="list-style-type: none"> a. The architectural detailing will result in a high-quality building and when working with existing buildings, original architectural features such as mouldings, architraves, chimneys or porches that contribute to the architectural character of a building should, where possible, be retained; b. High quality, durable and sustainable materials that respond to the local character in terms of quality, durability, attractiveness, sustainability, texture and colour are incorporated; c. Services, utilities and rainwater goods will be discreetly incorporated within the building envelope⁴²; and d. To ensure the design of roof-form positively contributes to the character of the local and wider area; proposals 	<ul style="list-style-type: none"> b) Define high quality Building Standards BS Kitemark? Too Subjective. d) Roof form type to be described. Hip Gable, Gable, Pitched, Mansard in the applicant’s design and access statement etc.

	should ensure the design is sympathetic with its local context.	
DM10.8	<p>To ensure a cohesive approach is taken to the design and management of landscape within the borough the Council will require proposals to:</p> <ol style="list-style-type: none"> Incorporate hard and soft landscaping; Provide spaces which are visually attractive, easily accessible and safe for all users, and provide a stimulating environment; Seek to retain existing landscape features that contribute to the setting and local character of an area; Retain existing trees and vegetation including natural habitats⁴³; In exceptional circumstances where the loss of mature trees is outweighed by the benefits of a development, those trees lost shall be replaced with new semi-mature trees of a commensurate species, scale and form; and Adherence with Supplementary Planning Guidance 12 Landscape Design and the Croydon's Public Realm Design Guide, or equivalent, will be encouraged to aid compliance with the policies contained in the Local Plan. 	<p>No Comment – these are all <u>naturally</u> subjective and could not be specific due to the subject matter.</p> <p>Enforce para d) and e).</p>
DM10.9	<p>To ensure a creative, sensitive and sustainable approach is taken to incorporating architectural lighting on the exterior of buildings and public spaces the Council will require proposals to:</p> <ol style="list-style-type: none"> Respect enhance and strengthen local character; Seek opportunities to enhance and emphasise the key features of heritage assets and local landmark buildings; or 	<p>Define “Seeking Opportunities”</p> <p>Surely there are already lighting standards that could be referenced or quoted?</p> <p>Measuring luminous flux per unit area. It is equal to one lumen per square metre.</p>

	<p>seek to encourage the use of public spaces and make them feel safer by incorporating lighting within public spaces; and</p> <p>c. Ensure lighting schemes do not cause glare and light pollution.</p> <p>d. Adherence with Croydon's Public Realm Design Guide, or equivalent, will be encouraged to aid compliance with the policies contained in the Local Plan.</p>	<p>Lumen is a measure of light intensity at the point source and at any distance required.</p> <p>The SI unit of luminous intensity is the lumen, an SI base unit.</p> <p>What are the standards for Floodlights (football pitches) or other sports areas? And the spill into residential areas?</p> <p>Require light intensity to be defined at specific distances from the source.</p>
DM10.10	<p>When considering the layout of new development, the council will support proposals that minimise the amount of blank and inactive frontages, increase the amount of natural surveillance and avoid dark and secluded areas.</p>	<p>What does this mean and How is it measured? These are subjective descriptive phrases which have no specification!</p> <p>Could specify the percentage area acceptable as "blank" and/or inactive. Otherwise meaningless</p>
DM10.11	<p>In the locations described in Table 6.3 and shown on the Policies Map as areas of focussed intensification, new development may be significantly larger than existing and should;</p> <p>a. Be up to double the predominant height of buildings in the area</p> <p>b. Take the form of character types "Medium-rise block with associated grounds", "Large buildings with spacing", or "Large buildings with Continuous frontage line"</p> <p>c. Assume a suburban character with spaces between buildings.</p> <p>Developments in focussed intensification areas should contribute to an increase in density and a gradual change in character. They will be expected to enhance and sensitively respond to existing character by being of high quality and respectful of the existing place in which they would be placed.</p>	<p>Define "significantly larger" – how much larger? Could be enormously larger what does it mean. (Height, footprint, massing, Density??)</p> <p>a. Double the <u>predominant height</u> should be a limit, but what about the footprint area?</p> <p>b. What is a "<i>medium-rise block</i>" (define) – within associated grounds need to include communal open space as it is presumably for multiple occupation (specify amount in ha/person).</p> <p>c. Suburban Character (setting) - Definition of "<i>suburban</i>" to avoid confusion with urban.</p> <p>Focussed Intensification to have increased density – <u>by how much</u> – Residential Density or Housing Density – to what limits? Units/hectare and hr/ha or bed-spaces/hectare.</p> <p>Need Guidance to comply with NPPF para 16 d) and para 122 Achieving appropriate densities.</p> <p>Refer to New Draft London Plan Policy D1A (see below)</p>

		<p>Policy D1A Infrastructure requirements for sustainable densities</p> <p>A The density of development proposals should:</p> <ol style="list-style-type: none">1) consider, and be linked to, the provision of future planned levels of infrastructure rather than existing levels,2) be proportionate to the site's connectivity and accessibility by walking, cycling, and public transport to jobs and services (including both PTAL and access to local services^{22A}). <p>B Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean, that if the development is contingent on the provision of new infrastructure, including public transport services, it will be appropriate that the development is phased accordingly.</p> <p>C When a proposed development is acceptable in terms of use, scale and massing, given the surrounding built form, uses and character, but it exceeds the capacity identified in a site allocation or the site is not allocated, and the borough considers the planned infrastructure capacity will be exceeded, additional infrastructure proportionate to the development should be delivered through the development. This will be identified through an infrastructure assessment during the planning application process, which will have regard to the local infrastructure delivery plan or programme, and the CIL contribution that the development will make. Where additional required infrastructure cannot be delivered, the scale of the development should be reconsidered to reflect the capacity of current or future planned supporting infrastructure.</p>
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		<p><u>What should be the Housing & Residential Density Limits (or ranges) in the designated Focussed Intensification areas? Or the other designated areas listed at CLP2 Table 6.4?</u></p> <p>a) Evolution without significant change of area's character; b) Guided intensification associated with enhancement of area's local character; c) Focussed intensification associated with change of area's local character; d) Redevelopment? CLP2 considers these are all "Urban" evolution NOT "SUBURBAN" evolution! Clarification needed to meet NPPF para 16 d and para 122 Achieving appropriate densities.</p>
DM11	Shop front design and security	
DM11.1	To ensure shop fronts are attractive, secure and of a high-quality design, the Council will support proposals for new shop fronts and related alterations that respect the scale, character, materials and features of the buildings of which they form part.	No Comment
DM11.2	To ensure shop fronts are attractive, secure and of a high-quality design, the Council will support proposals for new shop fronts and related alterations in the Metropolitan Centre, District and Local Centres, Shopping Parades and Restaurant Quarter Parades that: <ul style="list-style-type: none"> a. Do not include wholly solid or perforated/pinhole external shutters; b. Employ less obtrusive solutions which could include: security glazing, internal shutters, external open, tube and link grille, brick bond parallel pattern lattice type grilles and shutters, concertina or scissor grilles, removable shutters; or 	Are any changes proposed for CLP3

	<p>c. In some instances, a mix of solid and open grille shutters may be acceptable as a solution where any element of solid external shutter proposed is transparent.</p>	
DM11.3	<p>To ensure shop fronts are sympathetically incorporated and to provide future flexibility, developments that convert shops into residential accommodation should:</p> <ul style="list-style-type: none"> a. Respect the scale, character, proportions, materials and features of the buildings of which they form part; b. Retain and incorporate historic shop fronts, including signboards, roller blind boxes, corbels, stall risers, cornices, fanlights, console brackets, transoms, pilasters and lobbies into the design; c. For new elements, adopt and reinterpret the language of shop front design; d. Optimise window and door openings; and e. Ensure the design includes elements that provide privacy for the occupiers. 	<p>c. What does “<i>reinterpret the language</i>” actually mean? Sounds nice but what does it mean?</p> <p>d. Define “<i>Optimise the windows and door openings</i>” Optimise against what?</p> <p>Too subjective and therefore meaningless as a requirement.</p>
Policy DM12	Advertisement Hoardings	
DM12.1	<p>To ensure advertisement hoardings positively contribute to the character and appearance of existing and new streets, the Council will require advertisement hoardings to:</p> <ul style="list-style-type: none"> a. Be designed to improve the public realm; b. Demonstrate that the rear of the signs are well designed; c. Reinforce the special character of heritage assets and other visually attractive parts of the borough; and d. Ensure the location and size of hoardings does not harm amenity or conflict with public safety. 	No Comment (yet)

<p>DM12.2</p>	<p>To ensure advertisement hoardings positively contribute to the character and appearance of the building on which they are attached:</p> <ul style="list-style-type: none"> a. The design and proportions should complement the symmetry and proportions of the host structure; b. They should be located where they do not obscure or destroy interesting architectural features and detailing; and c. They should be located where they do not cover windows or adversely impact on the functioning of the building. 	<p>No Comment</p>
<p>DM12.3</p>	<p>A proposal to display advertisements in Areas of Special Advertisement Control will need to demonstrate that it would not:</p> <ul style="list-style-type: none"> a. Significantly detract from residential amenity; b. Affect the setting or character of a heritage asset; c. Have a significant impact on the character of Metropolitan Green Belt, Metropolitan Open Land, or other rural spaces; d. Have a significant impact on public safety including potential for traffic hazards; e. Have a significant impact on environmentally sensitive and major gateway approaches to the borough; f. Visually separate areas such as car parks and other locations where a safety issue may arise as a result of obscured views into an area; and g. Result in numerous hoardings in an area where the cumulative impact would be detrimental to visual amenity. 	<p>a) What is considered a “<i>significantly <u>detraction</u> from residential amenity</i>” – its physical placement or what is written on the advertisement? If physical placement – how is this measured and what is considered “significant”?</p> <p>c) d) & e) What is considered a “<i>significant <u>impact</u></i>” on MGB or MOL, Public Safety or Environmentally sensitive at major gateway approaches to the borough?</p> <p>g) What would be considered “<i>numerous</i>”? How many is numerous and how do you measure “<i>cumulative</i>” impact?</p>
<p>Policy DM13</p>	<p>Refuse & Recycling</p>	
<p>DM13.1</p>	<p>To ensure that the location and design of refuse and recycling facilities are treated as an integral element of the overall design, the Council will require developments to:</p>	<p>a) Clarification define <i>building envelope</i> - Within the building envelope means what? within the site, within the curtilage or behind the building line, within the perimeter of the building?</p>

	<p>a. Sensitive integrate refuse and recycling facilities within the building envelope, or, in conversions, where that is not possible, integrate within the landscape covered facilities that are located behind the building line where they will not be visually intrusive or compromise the provision of shared amenity space;</p> <p>b. Ensure facilities are visually screened;</p> <p>c. Provide adequate space for the temporary storage of waste (including bulky waste) materials generated by the development; and</p> <p>d. Provide layouts that ensure facilities are safe, conveniently located and easily accessible by occupants, operatives and their vehicles.</p>	<p>c) <i>Adequate space generated by the future occupants – not the development!</i></p> <p>d) <i>Make sure any gates are opened to allow access (correct handed)</i></p> <p>e) <i>Ensure that bin storage allows for the specific number of Bins required for required recycling types, general waste, food waste and garden waste as appropriate for the number of future occupants.</i></p> <p>f) <i>Incorporate the detail from “Waste and Recycling in Planning Policy Document August 2015 Edited October 2018 Produced by LBC Waste Management Team: https://www.croydon.gov.uk/sites/default/files/articles/downloads/New%20build%20guidance.pdf</i></p>
DM13.2	To ensure existing and future waste can be sustainably and efficiently managed the Council will require a waste management plan for major developments and for developments that are likely to generate large amounts of waste.	Communal Waste for blocks of flats – allocation dependent on number of occupants? Not number of dwellings! Provide a formula Per number of occupants.
Policy DM14	Public Art	
	<p>To enhance and express local character, the Council will support the inclusion of public art and require all major⁴⁶ schemes to include public art that:</p> <p>a. Is integrated into proposals at an early stage of the design process;</p> <p>b. Enhances and creates local distinctiveness and reinforces a sense of place;</p> <p>c. Responds to local character;</p> <p>d. Makes a positive contribution to the public realm; and</p> <p>e. Engages the local community in its creation</p>	No Comment
Policy DM15	Tall & Large Buildings	
	To ensure tall or large buildings respect and enhance local character, and do not harm the setting of heritage assets, proposals will be permitted where they meet the following criteria:	a) No actual policies in Policies DM34 to DM49; all statements are subjective descriptions which could NOT be enforced.

	<p>a. They are located in areas identified for such buildings in Policies DM34 to DM49;</p> <p>b. They are located in areas meeting a minimum Public Transport Accessibility Level (PTAL) rating of 4, with direct public transport connections to the Croydon Opportunity Area;</p> <p>c. The design should be of exceptional quality and demonstrate that a sensitive approach has been taken in the articulation and composition of the building form which is proportionate to its scale;</p> <p>d. The building height, footprint and design relates positively to any nearby heritage assets, and conserves or enhances the significance and setting of the assets of the wider historic environment;</p> <p>e. To improve the quality of and access to open space, developments including buildings taller than 40 storeys will need to incorporate amenity space, whether at ground level such as atria or above ground level, such as sky gardens and roof terraces, that is accessible to the public as well as residents of the development; and</p> <p>f. To ensure tall and large buildings are well integrated with the local area, they should include at least an active ground floor and inclusive public realm.</p>	<p>b) None in Shirley as max PTAL is 3 (Should be only located in PTAL's 5-6)</p> <p>c) Area of <u>amenity space</u> (in sq.m. or hectares) to be defined as a relationship to the number of potential occupants of the building within the site area or locally with an acceptable (to be defined) distance from the building.</p> <p>Car parking allocation for occupants (See Transport and Communication) references?</p> <p>Hopefully this policy DM15 NOT appropriate to the "Shirley Place"</p>
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Policy DM16	Promoting Healthy Communities	
DM16.1	<p>The Council, working with relevant organisations, will ensure the creation of healthy communities which encourage healthy behaviours and lifestyles by requiring developments to:</p> <p>a. Consider health and wellbeing during the design of a development to maximise potential health gains and ensure any negative impacts can be mitigated;</p> <p>b. Ensure access to open spaces and facilities for sport, recreation, play and food growing;</p> <p>c. Promote active travel and physical activity through cycling and walking opportunities that are well linked to existing pedestrian and cycling infrastructure;</p>	<p>b) Access within what distance from developments?</p> <p>d) How much space? And how accessible? (near/distance?) walking distance?</p> <p>e) Define measurement limits of pollutants</p>

	<p>d. Create spaces for social interaction and community engagement which are designed to be safe and accessible to all; and</p> <p>e. Assess and mitigate pollutants and other environmental impacts on health.</p>	
DM16.2	The Council will work with NHS partners to support the provision of new healthcare facilities and improvements to existing facilities which provide services important for the physical health, mental health and general wellbeing of communities.	What is the appropriate level of health service GP provision per 1000 residents?
Policy DM17	Views and Landmarks	
DM17.1	The Council will consider the proposed development in relation to its impact on protected Local Designated Views such that developments should not create a crowding effect around, obstruct, or appear too close or high in relation to any Local Designated Landmarks identified in the Local Designated View.	E.G. The Shirley Windmill What is <u>too close</u> (distance) and <u>too high</u> (height)? Needs to be defined as these are <u>too</u> subjective?
DM17.2	Developments should enhance Croydon Panoramas as a whole and should not tightly define the edges of the viewing corridors from the Croydon Panoramas. Developments should not create a crowding effect around, obstruct, or appear too close or high in relation to any Local Designated Landmarks identified in the Croydon Panoramas.	Difficult to define as recent sky line is peppered with skyscrapers destroying the panoramas
DM17.3	Public access to all viewpoints to Local Designated Views and all Croydon Panoramas should be maintained.	Shirley Hills view point – can now only see skyscrapers
Policy DM18	Heritage assets & Conversation	
DM18.1	<p>To preserve and enhance the character, appearance and setting of heritage assets within the borough, the Council will determine all development proposals that affect heritage assets in accordance with the following:</p> <p>a. Development affecting heritage assets will only be permitted if their significance is preserved or enhanced;</p>	<p>Define any additional Heritage Assets – along Wickham Road etc. Cottages or others that we can define? Such as links with notable past residents?</p>

	<p>b. Proposals for development will only be permitted if they enhance the setting of the heritage asset affected or have no adverse impact on the existing setting;</p> <p>c. Proposals for changes of use should retain the significance of a building and will be supported only if they are necessary to keep the building in active use; and</p> <p>d. Where there is evidence of intentional damage or deliberate neglect to a heritage asset, its current condition will not be taken into account in the decision-making process.</p>	
DM18.2	<p>Applications for development proposals that affect heritage assets or their setting must demonstrate:</p> <p>a. How particular attention has been paid to scale, height, massing, historic building lines, the pattern of historic development, use, design, detailing and materials;</p> <p>b. That it is of a high quality design that integrates with and makes a positive contribution to the historic environment; and</p> <p>c. How the integrity and significance of any retained fabric is preserved.</p>	<p>Define any additional Heritage Assets – along Wickham Road etc. Cottages or others that we can define? Such as links with notable past residents?</p>
DM18.3	<p>To preserve and enhance Listed Buildings, Scheduled Monuments and Registered Parks and Gardens within the borough, the Council will determine all development proposals that affect these heritage assets in accordance with the following:</p> <p>a. Substantial harm to or loss of a Grade II Listed Building or Registered Park and Garden should be exceptional;</p> <p>b. Substantial harm to or loss of a Grade I or II* Listed Building or a Scheduled Monument should be wholly exceptional; and</p>	<p>List Shirley Windmill? Any Registered Parks or Gardens in Shirley? Temple Copse etc.</p> <p>a) & b) Substantial harm – undefined</p>

	All alterations and extensions should enhance the character, features and setting of the building or monument and must not adversely affect the asset's significance	
DM18.4	<p>To preserve and enhance the character, appearance and setting of Conservation Areas within the borough, the Council will determine all development proposals that affect Conservation Areas in accordance with the following:</p> <ol style="list-style-type: none"> a. The demolition of a building that makes a positive contribution to the special character and appearance of a Conservation Area will be treated as substantial harm; b. Where the demolition of a building in a Conservation Area is considered to be acceptable, permission for its demolition will only be granted subject to conditions linking demolition to the implementation of an approved redevelopment scheme; and c. All proposals for development must have regard to the development principles in the Conservation Area General Guidance Supplementary Planning Document and Conservation Area Appraisal and Management Plan Supplementary Planning Documents or equivalent. 	<p>See Policies Map for areas of Nature Conservation Importance – Can we designate new conservation Areas?</p> <p>Does CLP3 define any new designations of Nature Conservation Importance as developments are driving out natural habitats for wildlife!</p>
DM18.5	<p>To preserve and enhance the character, appearance and setting of Locally Listed Buildings within the borough, the Council will determine all development proposals that affect Locally Listed Buildings in accordance with the following:</p> <ol style="list-style-type: none"> a. Substantial weight will be given to preserving and enhancing Locally Listed Buildings; where demolition is proposed, it should be demonstrated that all reasonable attempts have been made to retain all or part of the building; 	<p>Any new designations for CLP3</p> <ol style="list-style-type: none"> a) What is “<i>substantial</i>” weight (in what metric!) what guidance? b) How to define “<i>enhance the building character</i>” – the alteration should conform to the existing built form and materials? c) Where is the list?

	<p>b. All alterations and extensions should enhance the building's character, setting and features and must not adversely affect the significance of the building; and</p> <p>c. All proposals for development must have regard to Croydon's Local List of Buildings of Historic or Architectural Importance Supplementary Planning Document or equivalent.</p>	
DM18.6	<p>To preserve and enhance the character, appearance and setting of Local Heritage Areas within the borough, the Council will determine all development proposals that affect a Local Heritage Area in accordance with the following:</p> <p>a. Substantial weight will be given to protecting and enhancing buildings, townscape and landscape features that make a positive contribution to the special character and appearance of a Local Heritage Area; and</p> <p>b. All proposals for development must have regard to the development principles in the Conservation Area General Guidance Supplementary Planning Document and the Local Heritage Area evidence base.</p>	<p>a) Substantial weight? What is considered "<i>substantial weight?</i>" weight (in what metric!) what guidance?</p> <p>b) Where are these documented – Reference?</p>
DM18.7	<p>Substantial weight will be given to conserving and enhancing landscape features or planting that makes a positive contribution to the special historic character and original layout of Registered and Locally Listed Historic Parks and Gardens.</p>	<p>Substantial weight? What is considered "<i>substantial weight?</i>" How are landscape features measured?</p>
DM18.8	<p>All development proposals must preserve and enhance War Memorials and other monuments, and their settings.</p>	
DM18.9	<p>In consultation with the Greater London Archaeological Advisory Service, or equivalent authority, the Council will require the necessary level of investigation and recording for development proposals that affect, or have the potential to affect Croydon's archaeological heritage. Remains of archaeological importance, whether scheduled or not, should be protected in situ or, if this is</p>	<p>Have we any? If So Reference them.</p>

	not possible, excavated and removed as directed by the Greater London Archaeological Advisory Service or equivalent authority.	
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