

**APPENDIX 6:**  
**Consultation Log: Old Town**  
**Masterplan SPD**

## CONSULTATION LOG: OLD TOWN MASTERPLAN SUPPLEMENTARY PLANNING DOCUMENT (SPD)

Formal consultation for the Draft Old Town Masterplan took place between February 10<sup>th</sup> and March 24<sup>th</sup> 2014.

All comments received by Croydon Council through the consultation process are responded to below. Some of the comments have been summarised.

The comments have been placed in one or more of the following themes:

Themes	Page Number
General	3
Consistency with other Planning Policy and Guidance	13
Tamworth Road Character Area	22
Section 2: Property Market Context	23
Section 3: The Old Town Masterplan	23
Public Realm Parameters	25
Development Parameters	30
Movement Parameters	45
Improving vehicular access from Roman Way in to the centre of Old Town	51
Phasing and Priorities	73
Components (in consecutive order)	76

- Minor changes have been made to the Old Town Masterplan SPD for reasons of formatting, legibility, factual accuracy and clarity. These changes are not listed below.
- When page numbers are referred to in the below log, these refer to those in the consultation drafts. Section numbers, page numbers and paragraph numbers may change in the revised versions of the document.
- *New and revised text is shown in italics.*
- The draft Old Town Masterplan that was consulted on is referred to as the draft Old Town Masterplan. The version of the masterplan that has been amended further to consultation and is being recommended for adoption is referred to as the final Old Town Masterplan.

Comments have been supplied by the following individuals or organisations. Each representee has been given an ID number (see below) to enable identification comments and their responses.

Representee ID Number	Representee
1	S Adams
1A	A Brogan
2	Cairo Properties Ltd / Guildhouse UK and Rospride Ltd
3	K Carter / Ursula Dyke
4	Croydon Partnership / c/o Quod
5	English Heritage
6	Environment Agency
7	D Gilbert
8	GLA
9	F Greenwood
10	J Hardie
11	Harvest Partnership
12	Highways Agency
13	B Huckson
14	S Jerrard
15	R Judd / Berkeley Homes (South East London) Ltd
16	E Levy
17	J Lynch-Rigby
18	P Mark
19	R McGhie Property
19A	R McGhie Property (additional form)
20	L McKee
21	J McLean

21A	Mid Croydon Conservation Area Panel
22	R Mingard
23	Mrs Moffall
24	J Myatt
25	G Oates
26	M Petts
27	Office of Rail Regulation
28	T Reeves
29	Salvation Army
30	B Smoker
31	C Souter
32	J Stevens
33	Thames Water
34	S A I Ward
34A	Gail Winter
35	Webster
36	Anonymous
36A	Anonymous
37	Anonymous
38	Anonymous
39	Anonymous
40	Anonymous
41	Anonymous
42	Anonymous
43	Anonymous
44	Croydon Council

Comment Number	Representee ID number	Chapter / component	Page number / paragraph	COMMENT	Impact on Old Town Masterplan Document*	RESPONSE
<b>General</b>						
1.	39.1			<p><b>Anti-social behaviour and maintenance</b> Late night noise caused by people parking for nightclubs on weekend especially at about 3am. Antisocial elements loitering around the open spaces near the Minster and Matthew's Yard – resultant litter and debris.</p>	NA + C*	<p>The Old Town Masterplan remit is to provide planning guidance for the built environment and therefore it cannot directly provide guidance for policing or maintenance.</p> <p>This has been stated clearly in section 2.2.7:</p> <p>2.2.7 The Old Town Masterplan does not provide guidance on policing, the management of public safety, maintenance, parking restrictions and or waste collection because, as a Supplementary Planning Document it does not have the remit to do this.</p> <p>All comments regarding these issues will be passed on to the relevant departments in Croydon Council for their information.</p> <p>Although the Old Town Masterplan cannot provide guidance</p>

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					<p>on policing, in relation to deterring crime and anti-social behaviour, the Old Town Masterplan encourages activation of the public realm which would increase natural surveillance and should reduce anti-social behaviour. This point has been emphasised in the revised draft of the masterplan within the DEVELOPMENT PARAMETERS on page 54:</p> <p><i>ACTIVE FRONTAGES</i>  <i>To contribute towards the creation of a vibrant environment and deter anti-social behaviour and crime the provision of active frontages to buildings is encouraged to increase natural surveillance of streets and public spaces. Active frontages have doors and windows facing the street.</i></p> <p>See also response to comment 30 XXX</p>
2.	44			There is inconsistent use of full-stops after bullet points.	C* All bullet points now have full stops at their ends. Where there is more than one sentence within a bullet point they have full stops, if they are not the final sentence.
3.	44			All of the base plans do not show recent development on Salem Place that is adjacent to the Croydon flyover.	C* These have been amended.
4.	1.1			Project looks exciting.	S*
5.	30.1			Chapter 2 gives a reasonable overview of the aims and aspirations for the Masterplan.	S*
6.	1.2			<p><b>Environmental Issues (Street Cleaning)</b>  I really hope this whole project will include the improvement of present disgusting piles of rubbish and broken down cars along the pavements. Landlords should be responsible - after all they benefit from the rent charged and we have to live with the consequences.</p>	<p>NA* The remit of the Old Town Masterplan is to provide planning guidance for the built environment which does not include specific guidance on street cleaning, waste collection and or maintenance. (Also, see response to comment number 1 above).</p>

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7.	2.3			<p><b>Section 2.2 'The Vision'</b> Nowhere in 'The Vision' presented on page 9 does it state that Croydon will be an attractive place to live, for both new and existing residents, despite this being one of the five strategic objectives outlined in Section 2.4. This, presumably, is an oversight. It should be corrected accordingly.</p>	NC*	The Vision states that Old Town will have “attractive neighbourhoods” which covers this point. The strategic objectives provide more detail.
8.	3.1			<p><b>Chapter 2</b> ♦ Setting the scene recognises that Croydon Heritage should be preserved and can be used as an asset.</p>	S*	
9.	3.5			<p><b>Chapter 3</b> <b>Enhancing awareness of historic environment</b> ♦ Suggest a sign/board at the top of Crown Hill headed “Historic Croydon” detailing brief outline of the historic places, including mention of 700 year old market. Positioned so the Minster Tower is viewable in the distance.</p>	C*	<p>A new section has been added to the public realm parameters:</p> <p><i>Interpretation Boards</i> <i>Interpretation boards which provide information about historic buildings and the historic environment could be place in key historic locations such as at the top of Crown Hill and outside Croydon Minster. They should be sensitively designed and could form part of a 'heritage trail' publicised with a leaflet. The interpretation boards will help celebrate the richness of the historic environment.</i></p>
10.	4.2			<p><b>Retail offer</b> The same paragraph describes the vision for the Old Town's retail, food and drink offer complementing that of North End and South End. Whilst CLP supports this aspiration, we would like to emphasise the importance of the retail offer <i>complementing</i>, rather than competing, with the Retail Core. This emphasis will ensure consistency with the retail hierarchy set out within the Local Plan</p>	C*	<p>This point was already made in The Vision p9, but it is now emphasised further in the revised masterplan, the foreword and Section 3.1.</p> <p>The Croydon Local Plan Policies Map 2013 provides further details on the retail designations for the area.</p>

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				(Strategic Policies), and ensure there is no conflict with the retail-led regeneration of the Retail Core.		
11.	4.3			<p><b>Property Market Context</b></p> <p>7. Paragraph 2.9.7 of the draft Masterplan describes the potential new retail centre to be developed by the Westfield and Hammerson partnership. It goes on to state that the development would be likely to increase and revitalise the branded retail offer, as well as greatly expand the town centre leisure offer. CLP welcomes the inclusion of this description and the recognition of the importance of the development to the retail and leisure provision within Croydon's town centre. We would however, like to request that this paragraph is strengthened by the recognition that the scheme has now received outline planning permission and CAC.</p>	C*	<p>2.9.7 now reads:</p> <p><i>The Whitgift Centre was the first covered shopping mall in the country and has been in need of a second substantial renewal for some time. The Croydon Partnership (a partnership between Hammerson and Westfield retail businesses) has been granted outline planning permission and Conservation Area Consent for the redevelopment of the Whitgift centre. If development goes ahead, this is likely to increase and revitalise the branded retail offer (especially in the fashion sector) and expand the town centre leisure offer.</i></p>
12.				<p><b>Property Market Context</b></p> <p>2.9.1 needs to include reference to the housing to the west of Roman Way and also residential accommodation above shops.</p>		<p>First bullet point has been amended to state: <i>Rows of, predominantly small, terraced houses in the south-west western and north-east areas.</i></p> <p>After the following bullet point the following text has been inserted:  <i>There is also some residential accommodation above the shops on Church Street, Surrey Street and Frith Road.</i></p>
13.	4.12			<p><b>General</b></p> <p>On the whole, CLP is supportive of the Council's approach to the proposal's set out</p>	S*	

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				within the draft Old Town Masterplan for the improvement of the area for residents, workers, shoppers and visitors.		
14.	4.13			<b>General</b> It is essential that any emerging guidance does not prejudice the successful delivery of CLP's redevelopment of the Whitgift Centre and the associated regenerative benefits for Croydon town centre.	NC*	The Council does not consider the success of both Old Town and the retail core to be mutually exclusive. The Old Town Masterplan states a desire for the retail in Old Town to complement that of the retail core.
15.	5.1			<b>General</b> We consider the document to be an exemplary response to the need for sustainable and managed change which puts the emphasis on local character.	S*	
16.	17.4			<b>General</b> I think Croydon is in massive need of a facelift and improvement. I think this could improve Croydon encouraging new people to visit Croydon and put it back on the map as a pleasant place to be, a great place to live easy to commute to and from with a wide range of public transport routes and fantastic shops improving the area for the local residents as well as local businesses.	S*	
17.	7.1			Chapter 2: Well researched	S*	
18.	7.2			Chapter 3: Good proposals overall	S*	
19.	15.1			<b>General</b> Berkeley supports the scope of the draft Masterplan in promoting the heritage-led regeneration of the Old Town. The Croydon Opportunity Area Planning Framework (OAPF) sets an objective of 7,300 new homes across the Metropolitan Centre over the next 20	S*	

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				years; only around 6% of these new homes will be within the Old Town.		
20.	15.2			<b>General</b> The draft Masterplan sets out a number of clear and innovative ways to improve and enhance the existing public realm within the Old Town and help promote a 'human scale' to the Metropolitan Centre, and these are all supported. As the wider Metropolitan Centre is developed, the Old Town will become an increasingly important amenity asset for new and existing residents.	S*	
21.	7.7			Chapter 5: Hope things really happen to make Old Town a better place!	S*	
22.	8.1			The SPDs appear comprehensive and should prove to be a useful tool for both planning and prospective developers.	S*	
23.	12.1			We have reviewed the documents and do not have any comment at this time.	S*	
24.	36.3			<b>General</b> Go for it!	S*	
25.	35.1			Chapter 2 is very wordy.	NC*	The amount of text is necessary to provide important background information on Old Town.
26.	35.2			Chapter 2 contains useful plans and background to the aspirations of the Council.	S*	
27.	14.1			Chapter 2 is commendable with a few exceptions.	S*	
28.	16.2			<b>Engagement with residents</b>  Firstly I believe for future redevelopment of the Old Town actual Local Residents have to be included on the "stakeholder board" because it is the residents who will give that idea or	NC*	In addition to formally consulting on the Draft Old Town Masterplan the Council has carried out a substantial amount of engagement with local residents during the development of the Old Town Masterplan, from the inception of the project. This has gone beyond the required engagement set out in the Council's Statement of Community Involvement available at

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			<p>opinion which will turn this masterplan into a unique piece of regeneration and make it stand out from the rest of the Masterplans. It therefore my happiness to inform you Myself and other Old Town are currently putting together a Community Group which once established we hope to work with both Allied &amp; Morrison's and Croydon Council to Continue to improve The Croydon Old Town Area and make it the most attractive places in Croydon to live and socialise.</p>		<p>the following link:  <a href="http://www.croydon.gov.uk/contents/departments/planningandregeneration/pdf/sci-august-2007.pdf">http://www.croydon.gov.uk/contents/departments/planningandregeneration/pdf/sci-august-2007.pdf</a></p> <p>Residents were not invited to sit on the Stakeholder Project Board because there were no formalised residents groups in existence when the Stakeholder Project Board was formed.</p>
29.	16.1		<p><b>The Masterplan boundary</b>          Whilst I am happy with the boarder being extended to include Waddon Rd &amp; St Johns' road I still feel more can be added these roads include Abbey Rd, Harrison Rise, Sylverdale Rd, Latimer road and Duppas hill Terrace which actually has a block of flats called "Old Town" the case which I'm aware is needed to justify the inclusion of these streets are to implement a heritage trail from Wandle park into old town through Waddon Rd &amp; St Johns road for pedestrians and the same for Duppas Hill park through Abbey Rd &amp; Harrison Rise with links for both parks you will see a benefit of having a larger number of visitors/cyclist coming into the Old Town area and onto Church St which in turn will enable you to attract more established independent shops e.g. proper family run butchers and grocery stores e.g. organic produce stores to Church St once it is redeveloped.</p>	C*	<p>A section has been inserted in between 2.2.4 and 2.2.5 of the draft Old Town Masterplan to explain the rationale for the masterplan study area:</p> <p><i>MASTERPLAN STUDY AREA</i>  <i>Old Town itself is not an administrative area and therefore does not have an official boundary. It is acknowledged that the area known as Old Town stretches further west and south beyond the Old Town Masterplan study area. However, the study area has been selected because it is considered that this is where there is most need for supplementary planning guidance for the built environment and the most opportunity for improvement of it at present.</i></p> <p>The Public Realm Context Text p22 has been amended to state that Duppas Hill is the nearest large green space for those in the South of the area and that links across Old Town (the continuation of Roman Way) are important for accessing this park.</p>

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30.	16.9			<b>Chapter 4</b> Support Chapter 4.	S*	
31.	16.11			<b>Management Issue</b> Request for a dispersal order to cover Old Town.	NA + C*	The Draft Old Town Masterplan is Draft Supplementary Planning Guidance covering the built environment. Planning Guidance cannot cover issues regarding policing and the management of public safety. Changes have been made to emphasise this point. (See response to comment 1.)
32.	17.1			Croydon is definitely in need of a major transformation as it has gone downhill and is a much less desirable place to be than it was when I was younger. It has so much potential that has been lost and has also got a bad name for the town I think the changes listed could improve the town and benefit both residents and businesses alike.	S*	
33.	18.5			Well done planners!	S*	
34.	19.1			Chapter 2: Firstly get 'Better Connected' on foot and on every type of transport. Good info.	S*	
35.	19.2			Chapter 3 The Draft Masterplan: Useful ideas drawn from good practice elsewhere. Take the best of the others.	S*	
36.	29.10			Although there is a lot of information to take in, it is presented in a way that is clear and understandable. The format for the Components was helpful and made the plan feel more accessible and realisable.	S*	
37.	35.6			Viability Very aspirational, and well-informed assessment of typologies for public realm, legibility, and spaces generally, but concern than some development, perhaps if it is lower value, or smaller scale, will not be able to deliver the grand aspirations held by the	NC*	The guidance sets parameters that are necessary for the Council to fulfil its statutory duties to protect heritage assets which includes their setting. The guidance has a degree of flexibility and is not overly prescriptive.

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				council, therefore development will be stifled and investment lost.		
38.	21A.1			The Panel are also concerned that street cleaning and cleaning of public open spaces should be diligently carried out.	NA*	See response to comment 1.
39.	27.1			Some proposals in the masterplan affect the railway and if these are developed further we would be happy to discuss them with you.	NC*	Noted.
40.	29.1			Support for heritage led regeneration	S*	
41.	29.5			Did not think that precedent images were appropriate apart from Walworth Road. However, appreciate that tastes vary and as long as the principles of the masterplan are adhered to changes should be positive.	C*	Some of the precedent images have been changed so that they are more relevant to Old Town.
42.	32.0			I am writing to request that the border of the old town master plan/conservation area be extended to include the St Edmonds Church building and the house attached to it. This is part of Wandle Park and integral to it and the buildings are entirely in keeping with those in the surrounding roads. As such, I feel they need protecting from development.  The buildings have an interesting history and I understand that the church has an association with the Croydon artist Cicely Mary Barker.	NC*	The Old Town Masterplan study area boundary cannot be extended further. It covers the historic core of Old Town and its surrounding area in which it is considered there is considerable potential regeneration benefit to Old Town. Whilst there is potential regeneration benefit to areas that lie beyond the study area boundary, there is a limit to the area that the Old Town Masterplan can cover. See also response to Comment XXX.
43.	33.0			<b>Infrastructure</b> To avoid issues of low water pressure and internal/external flooding developers must demonstrate that they have planned for water supply, sewerage and surface water drainage	NC*	Noted. Although this duty is a legal requirement it is not a planning requirement and therefore it is not necessary to include it in the Old Town Masterplan document.  Further information has been added on Sustainable Urban

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				requirements for new buildings including drainage impacts downstream.		Drainage Systems. See response to comment XXX.
44.	44			There is a fair amount of repetition in the document which is unnecessary.	C*	There is a need for a certain amount of repetition in the Old Town Masterplan because it is intended to be a quick reference document and certain points require emphasis throughout to make sure they are understood by the reader. However, it has recognised that there was excessive repetition in some parts of the document and this has been removed.
45.	16.11			<b>Management Issue:</b> Request for a dispersal order to cover Old Town.	F+ NA*	See response to comment 1.
46.	29.6			To increase safety and the perception of safety OT14 Reeves Corner tree group and the grass behind the Salvation Army on the corner of Rectory Grove and Jubilee Car Park should be a non-alcohol zone.	NA*	See response to comment 30 XXX.
47.	29.6			To increase safety and the perception of safety OT14 Reeves Corner Tree Group and the grass behind the Salvation Army on the corner of Rectory Grove and Jubilee Car Park should be a non-alcohol zone.	F + NA*	See response to comment 1.
<b>Consistency with other Planning Policy and Guidance</b>						
48.	2.1			The London Plan requires the Croydon Opportunity Area to be a "focus for growth through flexible and pragmatic planning". The potential for growth must be embraced and encouraged throughout the Opportunity Area, including Old Town, and it is important that the Masterplan contributes to this.	NC*	The Draft Masterplan contributes to encouraging growth in the opportunity area and is consistent with the Croydon Opportunity Area Framework. Both documents emphasise that the desire for additional growth in Old Town must be balanced against the need to preserve and enhance heritage assets which contribute greatly towards the rich character of Old Town and the wider Opportunity Area. The OAPF signals on page 66 that tall buildings are "unlikely to be acceptable" in the Old Town Area. Both the OAPF and the Draft Masterplan emphasise the importance of high quality design.

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49.	2.2		<p>The London Plan states that development in Opportunity Areas should seek to "optimise residential output and densities"<sup>3</sup>. This policy applies to LDF preparation. It must therefore be properly reflected throughout the Masterplan. At present however, there is no mention of this policy requirement in the text of the Masterplan. Our 'general comments', under Q.7 of the enclosed form, identify minor amendments to the text of the foreword in order to incorporate this important policy objective.</p>	NC + C*	<p>There is no requirement to repeat London Plan guidance in the Old Town Masterplan.</p>
50.	2		<p>Chapter 2 should state very clearly that the Old Town area will contribute to the residential growth required in the Croydon Opportunity Area, and not simply serve as an amenity resource for residents of the wider Metropolitan Centre.</p> <p><b>Section 2.2.2</b> As currently drafted, the final sentence of Section 2.2.2 suggests that the Old Town area will not contribute in any significant way to the population growth required of the Croydon Opportunity Area, and that growth will instead take place in "<i>the wider Metropolitan Centre</i>". As the Croydon Opportunity Area Planning Framework (OAPF) makes clear however, the Old Town area will contribute to population growth within the Opportunity Area throughout the course of its lifetime<sup>1</sup>.</p> <p>The final sentence of this section also states</p>		<p>It is considered that the Old Town Masterplan defines clearly that there is some potential for residential growth in Old Town.</p> <p>The OAPF and the Croydon Local Plan: Strategic Policies Development Plan Document both recognise that Old Town has a high amenity value and describe the value of its heritage assets, well-designed residential streets and public spaces.</p> <p>The Old Town Masterplan builds on the guidance provided in the OAPF. The areas of the Opportunity Area that lie within walking distance of Old Town have significantly fewer amenity facilities in terms of heritage assets and attractive public spaces than Old Town. It is therefore considered important to stress that future residential communities outside of Old Town will benefit from being able to access the amenity facilities of Old Town.</p> <p>To provide additional clarity on this topic, the text of 2.2.2 has been changed to the following:</p> <p><i>The Old Town Masterplan promotes heritage-led regeneration</i></p>

<sup>1</sup> Refer, for example, to Fig. 4.8 of the OAPF

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			<p>that both the OAPF and the 'Croydon Local Plan: Strategic Policies' anticipate that the Old Town area will play <i>"an increasingly important amenity role for the new residential communities in the wider Metropolitan Centre"</i>. The Strategic Policies document, however, does not make specific reference to the amenity potential of the Old Town area in its section on the Croydon Opportunity Area ('Chapter 7, The Places of Croydon', pg 77 - 78). Its references to amenity improvements relate to the COA as a whole. The OAPF meanwhile, in setting out general land use approaches for the various character areas within the COA, states simply that the 'Southern and Northern Areas' (incorporating Old Town) will be <i>"residential led with some opportunity for small-scale high street uses where there is a need"</i>. Neither document focusses specifically on the <i>"increasingly important amenity role"</i> of the Old Town area.</p> <p>We suggest the following amendments to the final sentence of section 2.2.2 accordingly:</p> <p><i>"Over the forthcoming years as the population of <b>Old Town and</b> the wider Croydon Metropolitan Centre grows significantly to meet Croydon's housing needs <del>and as is anticipated in the Croydon Local Plan: Strategic Policies and Croydon Opportunity Planning Framework (see section 2.1);</del> it is anticipated that Old Town will play an increasingly important <b>amenity</b> role <b>as both a residential area and an amenity area</b> for the new residential</i></p>	<p><i>to build on the area's existing strengths as a place- its heritage assets, public spaces and independent retail which include a street market. It suggests how the heritage assets of the area should be preserved, enhanced, celebrated to raise the profile of the area's heritage. This should strengthen the distinct identity of Old Town.</i></p> <p><i>The heritage assets and public spaces of Old Town will play an increasingly important role over the forthcoming years for the whole of the Metropolitan Centre as more high-density developments are built to meet Croydon's housing need that will have minimal private amenity space. The residents of these area will benefit from the heritage assets and public spaces located within walking distance in Old Town.</i></p> <p><i>There is some potential for residential development in Old Town, but not of the same scale as other areas within the opportunity area.</i></p>
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				<del>communities in the wider Metropolitan Centre within the COA”</del>	
51.	2			<p><b>Section 2.2.3</b>                  We welcome the confirmation in this section that the Masterplan will provide ‘indicative parameters’ regarding the development of buildings, streets and public spaces. It is important that guidance within the Masterplan relating to specific sites or buildings is not misunderstood as being an inflexible, prescriptive standard.                  This section also states that <i>“The Croydon Opportunity Area Framework’s technical evidence suggests that Old Town has the capacity to accommodate approximately 350 new homes”</i>. There is no detail provided as to how this figure is arrived at. Furthermore, this figure is a contradiction of Section 2.10.3 of the Draft Masterplan which, referring to the guidance provided by the OAPF, states that <i>“Old Town has the capacity to accommodate approximately 400 new homes in the long term”</i>. The figure of ‘approximately 400 new homes’ is consistent with the residential capacity figures presented in Figure 4.8 of the</p>	<p>C*</p> <p>In the OAPF Technical Appendix it is estimated that Old Town has the capacity to accommodate approximately 400 homes. 2.2.3 now states this.</p> <p>The following document has been listed in 2.10 under Local Policy.</p> <p><b>TECHNICAL APPENDIX                  FURTHER EVIDENCE AND JUSTIFICATION, Croydon Town Centre Opportunity Area Planning Framework, Adopted 2013</b></p> <p>It is sufficient to state that the residential capacity is an approximate figure. The word “approximate” implies it could be exceeded or reduced.</p>

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				OAPF. It is important that the Masterplan is consistent in its guidance on residential capacity, and the figure of 'approximately 400 new homes' should therefore be used. In accordance with the policy objectives of the London Plan to optimise residential output however, it should also be acknowledged that this figure is a guide only and may be exceeded.		
52.	2			<p><b>Section 3.3.6 Provision of Family Housing</b>  The first paragraph under 'Provision of Family Housing' states that the OAPF "<i>sets out a family housing policy of 45% 3+ bed homes in Old Town for new residential development</i>". It is not correct to describe this as a 'policy'. The word 'policy' suggests a prescriptive standard to be applied inflexibly to development proposals. This is not the intention of the OAPF, which describes the 45% figure as a 'broad requirement' for the entire 'Southern and Old Town' character area (OAPF, paragraph 4.47). As the next sentence of the Draft Masterplan acknowledges, "<i>exact levels of family housing will be determined on a case by case basis</i>".</p> <p>It should also be acknowledged that, with census figures confirming steadily falling family sizes, 3 bedroom units no longer represent the minimum unit size required for modern families. The reference here to '3+ bed homes' should therefore be amended to refer simply to 'family housing' in order to enable the inclusion of 2 bed units when determining appropriate</p>	NC + C*	<p>The definition of family housing and the recommended level of family housing stated in the Old Town Masterplan is consistent with that provided in the OAPF and the Croydon Local Plan, as required by Planning Law.</p> <p>The text has been amended for clarity and to describe the text in the OAPF as guidance rather than policy. It now reads as follows:</p> <p><i>Old Town is one of the most appropriate areas for family housing in the Croydon Metropolitan Centre. A proportion of 45% of 3+ bedroom homes in Old Town is proposed for new residential development, but exact levels of family housing will be determined on a case by case basis. (This guidance is consistent with the Croydon OAPF).</i></p>

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			<p>levels of family housing in new development.</p> <p>The second sentence of this paragraph should therefore be amended to read as follows:  <i>"It therefore sets out a <del>family housing policy</del> broad objective of for 45% 3+ bed homes family housing in Old Town for new residential development"</i></p>		
53.	2		<p><i>Section 2.10.3</i>  This section states that the OAPF, amongst other 'key observations and guidance', advises that in Old Town <i>"45% of new housing should have 3 or more bedrooms"</i>. This is not a full representation of what the OAPF says on this matter. The 45% figure is described in the OAPF as a 'broad requirement' for the entire 'Southern and Old Town' character area, which extends beyond the Masterplan boundary. Paragraph 4.48 of the OAPF clearly states that <i>"The exact level of three bed+ housing will be determined on a case-by-case basis. Some sites will deliver more, while other sites will deliver less. The figures are a starting point and the final agreed level of three bed housing should also be informed by; site context, site history, design potential, building height"</i>.  The text of the Draft Masterplan should be amended accordingly:</p> <p><i>"Old Town is a suitable location for family housing and 45% of new housing should have 3 or more bedrooms. While there is a broad</i></p>	C* + NC*	<p>Text has been amended to emphasise that the provision of 45% 3+ bedroom flats is a broad requirement.</p> <p>Revised text:  <i>Old Town is a suitable location for family housing and there is a broad requirement for 45% of new housing to have 3 or more bedrooms.</i></p> <p>Other information requested for inclusion in the Old Town Masterplan was already provided in the Draft masterplan in Section 3.3.6 and in the OAPF itself. It is not necessary to repeat it here.</p> <p>Family housing is defined by the Croydon Local Plan as being of 3 or more bedrooms and therefore this description has not been changed.</p>

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				<i>requirement for 45% of new housing across the entire 'Southern and Old Town' character area to be suitable for families, this should not be applied as a prescriptive standard across all sites. The exact level of family housing in new developments will be determined on a case-by-case basis".</i>		
54.	2			<b>Section 3.1.3</b> This section refers to sites within the Old Town area that can <i>"help deliver the homes proposed in the Croydon Local Plan: Strategic Policies and in the Croydon Opportunity Area Planning Framework"</i> . The opening sentence of this section should also refer to The London Plan, which is a fundamental element of the planning policy hierarchy applying to the area: <i>"help deliver the homes proposed in <b>The London Plan</b>, the Croydon Local Plan: Strategic Policies and in the Croydon Opportunity Area Planning Framework"</i> .	C*	The text has been changed to the following:  <i>"help deliver the homes proposed in The London Plan, the Croydon Local Plan: Strategic Policies and in the Croydon Opportunity Area Planning Framework"</i> .
55.	2			<b>3.1.3</b> There are a limited number of opportunity sites for new housing in Old Town. It is even more important therefore, that housing delivery on these sites is optimised in accordance with the policy objectives of The London Plan <sup>2</sup> . An additional sentence should therefore be added to this section, after the opening sentence, in order to clarify this and to ensure consistency with The London Plan: <i>"It is important that housing delivery on the available opportunity sites is optimised in</i>	NC*	It is not necessary to provide further guidance in this part of the document which serves as an introduction to the Old Town Masterplan. Further guidance on Development Parameters is provided in section 3.3.  Please see Comment XXXXX for a response to the request to state that housing delivery should be optimised on opportunity sites.

<sup>2</sup> Refer, for example, to Policy 3.2, 2.13 and paragraph 3.19

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			<i>accordance with the aims and objectives of The London Plan”</i>		
56.			<p><b>Section 3.8.11 OT16</b> Cairo New Road is the largest opportunity site for housing delivery in the Old Town area, and has the potential to deliver a significant amount of new homes. This should be more accurately reflected in the text of this section: <i>“Cairo New Road, with potential for a significant number of new homes.”</i></p>	NC*	The Old Town Masterplan describes the capacity for residential development of the Cairo New Road component accurately. The constraints for the Cairo New Road site – its proximity to a conservation area, a Grade I listed building, other low-rise buildings and a flyover mean that it would be inaccurate to state that a significant amount of housing could be delivered on this site.
57.			<p>The Croydon Local Plan: Strategic Policies states that the Croydon Opportunity Area is to be <i>“a focus for growth through flexible and pragmatic planning”</i><sup>3</sup>. It is important therefore, that the potential for growth is embraced and encouraged throughout the Opportunity Area, including the Old Town.</p> <p>The London Plan is very clear in requiring that development in Opportunity Areas should <i>“seek to optimise residential output and densities”</i><sup>4</sup>. This policy applies to LDF preparation, and it is important that it is properly reflected throughout the Masterplan. The current foreword to the Draft Masterplan however, while acknowledging that sites for new housing exist in Old Town, makes no mention of the requirement to optimise residential output and densities on these sites. It presents the existence of sites for new housing within the Old Town area as being of</p>	C*	<p>The following paragraph has been included in the Foreword to emphasise that there is some opportunity for residential development in Old Town. However, as the masterplan demonstrates, there is not substantial opportunity for development in the Old Town part of the Croydon Opportunity Area due to the requirement to preserve and enhance the historic environment.</p> <p><i>The Old Town Masterplan is a different kind of masterplan to other masterplans produced by Croydon Council because the study area has key differences. Firstly, there is much less large-scale development potential because of the significant number of heritage assets in the Old Town area. Instead there are a significant number of infill development opportunities that if realised and designed to respect the historic character of Old Town will greatly assist in knitting the urban fabric of the area back together, improve its appearance and where appropriate,</i></p>

<sup>3</sup> Croydon Local Plan: Strategic Policies, paragraph 7.29

<sup>4</sup> Refer, for example, to paragraph 3.19 & Policy 3.4 of The London Plan

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			<p>secondary importance to the provision of improved amenity facilities. The message conveyed is that the overriding objective for Old Town is for it to act as an amenity and recreational resource for an expanded population in the wider Metropolitan Croydon, rather than develop as a vibrant and sustainable urban community in its own right.</p> <p>As such, we propose the following amendments to the foreword of the Draft Masterplan:</p> <p><b>Section 1.1.2</b>  <i>“The Old Town Masterplan outlines how the historic environment of Old Town can be preserved, enhanced and promoted to improve quality of life for <b>both existing and future</b> residents and visitors to the area and support the local economy”.</i></p> <p><b>Section 1.1.4</b>  <del>“Although there are a limited number of sites for new housing in Old Town</del> <i>There are a number of important Opportunity Sites for new housing in Old Town, and the delivery of new housing on these sites must be optimised to help meet Croydon’s housing need in accordance with the requirements of The London Plan. As well as growing its own population, the area will play an increasingly important role in providing valuable amenity facilities for the growing population within walking distance in the surrounding town centre”.</i></p>	<p><i>deliver new homes.</i></p>
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58.	35.3			The plan highlights the status and importance of the COAPF but then proceeds to water down its intentions by being overly restrictive.	NC*	<p>We consider that the guidance strikes the right balance between providing specific guidance to give developers certainty on what would and would not be likely to be granted planning permission whilst allowing for reasonable flexibility to take account of the particular circumstances of individual sites.</p> <p>The Old Town Masterplan does not water down the guidance in the OAPF. Rather it provides a further layer of area specific guidance.</p>
59.	35.4			<p><b>Consistency with the OAPF</b> 2.9.4 identifies Green Dragon House on High Street and Surrey House on Surrey Street as two of the main office buildings in this part of Croydon, but both have prior approval for conversion to residential use so this information is no longer correct.</p>	C*	<p>The text has been changed to reflect the potential for office to residential conversion. It now states:</p> <p><i>A very small amount of Croydon's Office stock is in the Old Town area. Some of this existing stock could be converted to residential accommodation.</i></p> <p><i>The largest office building in Old Town is Ryland House which is occupied by BT.</i></p>
<b>Tamworth Road Character Area</b>						
60.	2.5			Our comments under section 2.5.13 relate to the description that is provided for the Tamworth Road area. They are informed by an expert heritage appraisal carried out on behalf of our client by KM Heritage Ltd., which found the area to have 'no underlying special character' and propose, accordingly, the deletion of sentence stating the road to have a unified character based on the presence of a	NC*	The masterplan text under 2.5.13 is considered an accurate description.

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				number of dispersed Victorian buildings.		
61.	2			<p><b>Section 2.5.13</b> This section points to the “<i>mixed and fragmented character</i>” of the Tamworth Road area. A professional Heritage Appraisal incorporating Tamworth Road has been undertaken on behalf of our client. This also found Tamworth Road to be mixed in character, with “<i>no underlying special character</i>”. The road as a whole cannot be described as being characterised by the ‘group value’ of a small number of dispersed Victorian buildings. The final sentence of Section 2.5.13 should therefore be deleted.</p>	NC*	We disagree. See response to comment 60, XXX
<b>Section 2: Property Market Context</b>						
62.	44			2.9.1 does not include reference to the housing to the west of Roman Way and also residential accommodation above shops.	C*	<p>First bullet point has been amended to state: <i>Rows of, predominantly small, terraced houses in the south-west western and north-east areas.</i></p> <p>After the following bullet point the following text has been inserted: <i>There is also some residential accommodation above the shops on Church Street, Surrey Street and Frith Road.</i></p>
63.	44			2.9.10 It would be helpful to know where the four areas of vacant units are located that are referred to in the text.	C*	This information has now been provided at the end of the 5th bullet point of 2.9.10.

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Section 3: The Old Town Masterplan						
64.	44			<p>The Old Town Masterplan Diagram (Indicative Plan).</p> <p>There is no explanation of why some sites for 'potential and consented housing' are shown and others are not and it is difficult to fathom the rationale behind this. There is a large potential housing development site on Scarbrook Road to the rear of 70-88 High Streets but this is not shown on the on plan.</p>	C*	<p>2 changes:</p> <p>The indicative and illustrative masterplan has been removed from the masterplan (Figure 18) to prevent it causing confusion.</p> <p>The following sentence has been added to the start of the Development Parameters 3.3.1:  <i>3.3.1 The following development parameters apply to all future development opportunities within the Old Town Masterplan study area, not only the opportunities outlined in The Components (Section 4).</i></p>
65.	44			<p>3.1.1. It is unclear what is meant by physical environment. Does this include streets?</p> <p>Some transport improvements can be delivered in the short term too.</p>	C*	<p>3.1.1 has been amended:</p> <p><i>The Old Town Masterplan provides guidance for the future development of the built environment in Old Town – buildings, public spaces and streets.</i></p>
66.	44			<p>On both of the masterplan drawings (figures 17 and 18) Many existing street trees or trees that are in front gardens that make a positive contribution to the streetscape are not show on the plans. In addition, new trees are not shown on some roads that currently need more street trees. This should be rectified.</p>	C*	<p>More existing and indicative trees have been added to Figure 17 on Tamworth Road, Howley Road, Salem Place, Charles Street, Church Road, Old Palace Road, Cairo New Road and Keeley Road.</p> <p>Figure 18 has been deleted. See response to comment XXX.</p> <p>The following text has been added to 2.7 Public Realm Context:</p>

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					<p><b>STREET TREES</b></p> <p><i>Street trees can make a highly valuable contribution to the visual amenity of streets, urban cooling and biodiversity. However, several streets in Old Town have a low number of street trees namely Drummond Road, Tamworth Road, Cairo New Road, Howley Road, Old Palace Road and Church Street.</i></p> <p>The following text has been added to 3.2 Public Realm Parameters:</p> <p><i>New street trees in Old Town are encouraged where there is the capacity for them.</i></p> <p><i>The following streets have a low number of street trees and would benefit significantly from additional trees: Drummond Road, Tamworth Road, Cairo New Road, Howley Road, Old Palace Road and Church Street (see OT16, OT26, OT24 and OT1).</i></p> <p><i>Trees must not make contact with the tramlines for safety. However, emphasis should be placed on identifying suitable locations for trees on streets on which the trams run, at a reasonable distance from the tramlines.</i></p>
<b>Public Realm Parameters</b>					
67.	4.4			Section 3.2 of the draft Masterplan provides a framework for public realm parameters within the Old Town. Paragraph 3.2.3 describes how the Old Town's public realm is extremely important in providing the backdrop and setting for commercial activity and residential	S*

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				neighbourhoods in the area and in unifying historic and contemporary buildings. CLP agrees with this statement and supports the Council's aspiration to reinforce the importance of the public realm through wide scale improvements to the streets and spaces within Old Town.		
68.	43.1			Proposals require more thought about creating a chain of spaces (Greater permeability).	C*	It is not feasible for new green spaces to be created in Old Town however the Draft Masterplan emphasises the importance of r enhancing existing green spaces and links between them.  The Public Realm Parameters have been amended to emphasise further the importance of street trees as a means of improving the visual appearance of streets and pedestrian route see response to comment XXX.
69.	43.2			The proposed area around the Croydon Minster is very positive.	S*	
70.	40.1			Informal play areas would be good.	S*	
71.	5.2			3.2.46 Play and street furniture should be designed and located so that it sustains and enhances the public realm and heritage assets.	C*	The following text has been added after 3.2.34  <i>GENERAL</i> <i>All street furniture, play facilities and public art should be designed and located so as it sustains and enhances the public realm and heritage assets.</i>
72.	5.3			3.2.56 We would not wish to discourage creative lighting and consider that sensitive lighting of heritage assets can both enhance and provide drama to the public realm. We would recommend that such lighting is robust, discrete and used to highlight architectural qualities. The opportunity to expand lighting to	C*	The following text has been added after 3.2.55:  <i>Creative lighting that is located within or adjacent to sites of heritage assets should be robust, discrete and used to highlight architectural qualities.</i>  <i>More dramatic lighting could be used on a temporary basis to add dramatic focus as is illustrated in the photographs on this</i>

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			provide more artistic performances and displays (as illustrated on page 48 and set out in 3.2.49) could be integrated with more functional lighting schemes to add dramatic focus and improve sightlines etc.		<i>page. However, its permanent use is discouraged as this would alter the character of the heritage assets in the Old Town Masterplan study area.</i>
73.	36A.3		Tree planting to soften and enhance the streetscape on both Howley and Old Palace Roads.	C*	New trees fronting the sports pitches on Howley Road are proposed in OT26.  The text within the Public Realm Sections has been amended to emphasise the importance of street trees. Please see response to comment XXX.
74.	36A.4		New cast iron street signs	NC*	Guidance on street signs is provided within the draft Conservation Area Appraisals and Management Plans for the Church Street, Central Croydon and Croydon Minster conservation areas. They state that existing cast iron and other historic street signs should be preserved.
75.	36A.5		Victorian style street lights.	NC*	The following text amendment has been made for further clarity regarding street lighting:  After 3.2.56 the following new bullet point has been inserted:  <i>The street lighting across Croydon is currently being replaced. Historic style street lighting is being installed on key historic streets.</i>
76.	18.1		As a local resident I should like to see real improvement to our green space areas i.e., the Memorial Garden incl the Tudor Arch (door). We all value this space on our roads but due to seclusion and high hedges, it is underutilised for concerns of safety.	S*	These objectives are included in OT23.
77.	35.5		<b>Playspace</b> 2.7.8 and 3.2.44 allows that play space provision be pooled and provided off-site, which seems sensible, but further guidance on	NC*	This is based on established guidance set out in the OAPF. Any required discussion regarding pooling should occur as part of pre-application discussions and proposals should be in accordance with Local and London Plan policy.

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				the mechanism for this should be provided.		
78.	29.2			Support improvements to the public realm to increase safety and enjoyment for people who live work and visit the area.	S*	
79.	29.3			Propose a heritage walk to help celebrate heritage which could also help bring the community together.	C*	The following text has been added to section 3:  <i>Interpretation boards which provide information about historic buildings and the historic environment could be place in key historic locations. such as at the top of Crown Hill and outside Croydon Minster. They should be sensitively designed and could form part of a 'heritage trail' publicised with a leaflet. The interpretation boards will help celebrate the richness of the historic environment.</i>
80.	44	2.7 .3		It is too vague to state that a large part of Old Town is more than 400m away from green space of a certain size. The size should be defined.	C*	2.7.3 has been amended as follows: "a certain size" has been replaced with the specific size which is XXXX. AMUP – even though I am updating the Public Realm Context Section, please can you supply me with this figure? Thanks, Ruth
81.	44			It is not emphasised enough that Exchange Square is a really important public space in Old Town.	C*	The following text has been added to 2.7 Public Realm Context:  <i>HARDSCAPED SPACES</i>  <i>Exchange Square is the only hardscaped public space in Old Town. It is privately owned but was made publically accessible in 2008 as part of the neighbouring development of Bridge House on Surrey Street. (See OT4 for further information.) The square forms the curtilage to the Surrey Street Pumping Station - a Grade II Listed Building that is currently unoccupied and in need of restoration (See OT5) although it remains visually attractive. The square also offers pleasing views of the Surrey Street roofscape. Exchange Square is under-used and</i>

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						<i>poorly maintained, although it is still a valued space, accommodating a monthly craft fair and other ad-hoc events such as bake-offs and crazy golf.</i>
82.	44			Streets (including street trees), the material palette, public art, seating are important components of the public realm that are not referred to in this section.	C*	<p>The following text has been added to 2.7 Public Realm Context:</p> <p><i>STREET SURFACE MATERIAL PALETTE</i>  <i>Street surfacing materials vary considerably, which can contribute towards a cluttered appearance. There are some cracked paving stones which also have a detrimental visual impact.</i></p> <p><i>STREET TREES</i>  <i>(See comment provided above for text)</i></p> <p><i>PUBLIC ART</i>  <i>There is one notable piece of public art in Old Town known as the portrait bench on Charles Street. It is a metal sculpture of three notable people of Croydon – Peggy Ashcroft, Coleridge Taylor and Ronnie Corbett. It was installed in 2013 and funded by Sustrans.</i>  <i>(see photo on page 46)</i></p> <p><i>SEATING</i>  <i>There is a lack of public seating in Old Town which deters people from sitting, consuming refreshments in the fresh air and appreciating the surrounding historic environment.</i></p> <p><i>LIGHTING</i>  <i>There are some attractive historic lighting columns in Old Town.</i></p>
83.	44			2.7.2 covers Access to Open Space and therefore should be moved next to 2.7.6.	C*	This has been actioned.

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84.	44			2.7.6 states that the aspiration is to meet national guidelines for access to a mix of public spaces for a range of recreational needs but it is not states what these are or where these can be found.	C*	This information has been included after 2.7.3:
85.	44			The reader is unlikely to know what formal and informal play spaces are. Could these be defined?	C*	The second sentence of 2.7.8 has been amended as follows:  <i>Old Town lacks both formally designated play spaces and play opportunities that are informally integrated in to the public realm. Informal play opportunities often serve more than one purpose such as public art that can be climbed on or seating that can be balanced on.</i>  XXXX
86.	44			The public realm parameters repeat guidance from OAPF on play but quote statistics for different sized areas which is confusing	C*	The OAPF guidance is only quoted in the Public realm Parameters now.
87.	44			The public realm parameters section includes generic guidance that is in the public realm parameters that is not just specific to Old Town.	C*	This has been removed.
Development Parameters						
88.	6A + B			<i>SUMMARY Emphasise that the Environment Agency Flood Risk Map shows nearly half of Old Town has a medium risk of flooding from river and parts of Old Town have a high risk of flooding from surface water. Retrofitting of properties to avoid flooding should be considered and</i>	C*	ON p52 after the section on DETAILING AND MATERIALS the following new section has been added:  <i>SUSTAINABLE DEVELOPMENT Development should be low-carbon, use recyclable materials where possible and take in to account the embodied energy of materials. It should meet the energy efficiency standards required by the Croydon Local Plan and Building Regulations.</i>

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			<p><i>(Sustainable Urban Drainage Systems) SuDS should be promoted, in particular adding greenery to the area that will slow down drainage. Specifications for SUDS in Cairo New Road should apply to the whole of the masterplan area.</i></p> <p><i>Advice</i>  <i>Drainage should be designed and implemented in ways that deliver other policy objectives of this Plan, including water use efficiency and quality, biodiversity, amenity and recreation.</i></p> <p><i>Policy 5.11 of the London Plan gives more direction on using green roofs: Major development proposals should be designed to include roof, wall and site planting, especially green roofs and walls where feasible, to deliver as many of the following objectives as possible:</i></p> <p><i>a. adaptation to climate change (i.e. aiding cooling)</i>  <i>b. sustainable urban drainage</i>  <i>c. mitigation of climate change (i.e. aiding energy efficiency)</i>  <i>d. enhancement of biodiversity</i>  <i>e. accessible roof space</i>  <i>f. improvements to appearance and resilience of the building</i>  <i>g. growing food.</i></p> <p><i>Within LDFs boroughs may wish to develop more detailed policies and proposals to</i></p>	<p><i>Please see P54 for guidance on mitigating flood risk.</i></p> <p><i>On p54 under the section on LANDSCAPE WITHIN DEVELOPMENT the following bullet points have been added:</i></p> <p><i>LANDSCAPE TO INCREASE SUSTAINABILITY</i></p> <ul style="list-style-type: none"> <li><i>• Nearly half of Old Town has a medium risk of flooding from rivers and parts of Old Town have a high risk of flooding from surface water. Flood risk should not be increased by development.</i></li> <li><i>• To make a significant contribution towards the sustainability of development the following measures are encouraged:</i></li> <li><i>• The planting of trees as well as other greenery to aid cooling</i></li> <li><i>• Sustainable Urban Drainage Systems (SUDs) including green roofs, swales and open ditches should be implemented where possible to mitigate flood risk</i></li> <li><i>• Food growing and community gardens are encouraged to reduce food miles and improve visual amenity</i></li> <li><i>• All of the above measures are also likely to have the benefit of improving visual amenity</i></li> <li><i>• Retrofitting of existing properties with SUDs is encouraged</i></li> <li><i>• The above measures are dually beneficial in that they will improve visual amenity as well as sustainability</i></li> <li><i>• For further information please see the Mayor's supplementary guidance of Sustainable Design and Construction, the London Borough of Croydon Surface Water Management Plan and the Level 1 and Level 2 Strategic Flood Risk Assessment for the London Borough of Croydon</i></li> </ul>
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			<p><i>support the development of green roofs and the greening of development sites. Boroughs should also promote the use of green roofs in smaller developments, renovations and extensions where feasible.</i></p> <p><i>The Mayor's supplementary guidance on Sustainable Design and Construction contains further guidance on including green space in urban developments. Please refer to section 2.3.4 on water and 2.4.4 on water pollution and flooding.</i></p> <p><i>London Borough of Croydon Surface Water Management Plan and Level 1 and Level 2 Strategic Flood Risk Assessment for London Borough of Croydon are also good sources of information.</i></p> <p>DETAIL</p> <p>Flood Risk Information The Environment Agency Flood Risk Map shows nearly half of Old Town has medium risk of flooding from river, meaning each year, this area has a chance of flooding of between 1 in 100 (1%) and 1 in 30 (3.3%). The most affected areas are Old Town Western Residential area, Old Town Eastern Residential area and the Minster Quarter. Caterham Bourne is an ephemeral river, and it is one of the sources of the River Wandle. During periods of heavy rainfall, the Caterham Bourne flows north-west through the south of</p>		
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			<p>the Borough, mainly along Brighton Road, and connects to the River Wandle at Wandle Park. Caterham Bourne is one of the dominant sources of flood risk in the borough.</p> <p>The updated Flood Map for Surface Water shows some parts of Old Town Western Residential area and the Minster Quarter have high risk of flooding from surface water, meaning each year, these areas have a chance of flooding of greater than 1 in 30 (3.3%). The updated Flood Map for Surface Water also shows wider parts of Old Town Western Residential area, Old Town Eastern Residential area and the Minister Quarter have medium to low risk of flooding from surface water. Medium risk means each year, these areas have a chance of flooding between 1 in 100 (1%) and 1 in 30 (3.3%). Low risk means each year, these areas have a chance of flooding of between 1 in 1000 (0.1%) and 1 in 100 (1%). Croydon has ranked fourth, nationally, as the most susceptible borough to surface water flooding.</p> <p>Advice Given the historical and urban setting of Old Town, it may seem there is little scope to incorporate parameters that have positive impacts on managing flood risk in the area. However, there is room for improvements if the Masterplan is intentional about incorporating even smallest measures of managing water.</p> <p>For areas most prone to flooding, as</p>		
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			<p>highlighted above, we recommend that consideration be given to use of flood proofing measures to reduce the impact of flooding when it occurs. It may be difficult to reduce the risk of flooding in this area, but the impact of flooding to properties can be minimised by introducing flood resilient measures. Flood proofing measures can be retrofitted and examples include barriers on ground floor doors, windows and access points and bringing in electrical services into the building at a high level so that plugs are located above possible flood levels.</p> <p>In terms of managing surface water in the wider area of Old Town, we fully support what is already mentioned in the draft Masterplan. Suggested parameters for soft landscaping and biodiversity, included in paragraph 3.2.37 are: Vegetation should be maximised throughout the Old Town area through measures including soft landscaping, significant tree planting, green roofs and green walls, taking full regard of technical considerations such as sub-surface infrastructure, drainage and maintenance.</p> <p>OT16 Cairo New Road, one of the components, also includes a good way forward: Should improve the surrounding public realm by introducing grass to the centre of the tram tracks to help soften the urban environment, improve sustainable urban drainage and</p>		
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			<p>provide wildlife corridors. This will not be possible in all locations where the tram runs, for example, where other vehicles share the track space.</p> <p>Have these measures been explored in other areas? Can these be extended to wider area? Sustainable drainage is not just about soft landscaping and biodiversity, but it can be incorporated in hard landscaped areas. New pedestrian areas, new pavements, new play space and new performance space can be laid with pervious paving, if feasible, and trees and bushes can be introduced in bioretention planters. We believe the Masterplan can consider and encourage use of these techniques wherever possible.</p> <p>Sustainable Urban Drainage Systems have multiple benefits as identified in paragraphs 6.7 and 6.8 of the Croydon Local Plan: Strategic Policies. Not only the use of SuDS will contribute to sustainable development, but it will contribute to enhanced amenity and aesthetic value of developed areas. It also provides habitats for wildlife in urban areas and opportunities for biodiversity enhancement.</p> <p>The London Plan gives a good direction on incorporating sustainable drainage system. Policy 5.13 on Sustainable drainage gives guidance on the drainage hierarchy which can be applied to any settings: Development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should</p>	
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			<p>aim to achieve Greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the following drainage hierarchy:</p> <ol style="list-style-type: none"> <li>1. store rainwater for later use</li> <li>2. use infiltration techniques, such as porous surfaces in non-clay areas</li> <li>3. attenuate rainwater in ponds or open water features for gradual release</li> <li>4. attenuate rainwater by storing in tanks or sealed water features for gradual release</li> <li>5. discharge rainwater direct to a watercourse</li> <li>6. discharge rainwater to a surface water sewer/drain</li> <li>7. discharge rainwater to the combined sewer.</li> </ol> <p>Drainage should be designed and implemented in ways that deliver other policy objectives of this Plan, including water use efficiency and quality, biodiversity, amenity and recreation.</p> <p>Policy 5.11 of the London Plan gives more direction on using green roofs: Major development proposals should be designed to include roof, wall and site planting, especially green roofs and walls where feasible, to deliver as many of the following objectives as possible:</p> <ol style="list-style-type: none"> <li>a. adaptation to climate change (i.e. aiding cooling)</li> <li>b. sustainable urban drainage</li> <li>c. mitigation of climate change (i.e. aiding energy efficiency)</li> <li>d. enhancement of biodiversity</li> <li>e. accessible roof space</li> </ol>	
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			<p>f. improvements to appearance and resilience of the building g. growing food. <i>Within LDFs boroughs may wish to develop more detailed policies and proposals to support the development of green roofs and the greening of development sites. Boroughs should also promote the use of green roofs in smaller developments, renovations and extensions where feasible.</i></p> <p>The Mayor's supplementary guidance on Sustainable Design and Construction contains further guidance on including green space in urban developments. Please refer to section 2.3.4 on water and 2.4.4 on water pollution and flooding. London Borough of Croydon Surface Water Management Plan and Level 1 and Level 2 Strategic Flood Risk Assessment for London Borough of Croydon are also good sources of information.</p>		
89.	44		There is no guidance provided on extensions.	C*	Guidance for extensions has now been included in section 3.3 to supplement the guidance provided in the CAAMPs for the Old Town conservation areas.
90.	44		Figure 22 does not show all of the frontages and townscape focal points that require improvement and therefore is misleading.	C*	This plan has now been removed.
91.	2		Section 3.3.22 This section relates to ground floor uses for Flyover Edge sites. It notes that the ground floors of Flyover Edge developments are	NC*	The use of the word "should" allows for alternative options to be proposed as part of planning applications.

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			<p>particularly challenging for residential use and goes on to state that “ground floor commercial or civic uses should form part of the development mix where residential aspect is poor and where continuity can be established with the existing patterns of use”. Continuity with the existing patterns of use however, may not be the most appropriate option in all cases. Requiring continuity with existing patterns of use could prove to be a major impediment on the viability of new development. This reference should be deleted accordingly:  <i>“Therefore ground floor commercial or civic uses should form part of the development mix where residential aspect is poor or cannot be mitigated to an acceptable level and where continuity can be established with the existing patterns of use”</i></p>		
92.	2		<p>Section 3.3.23  This section puts forward a ‘typical development height’ for Flyover Edge sites of 3 – 10 stories. It is not appropriate for the masterplan to advance specific height ranges such as this, which may have the effect of constraining options for quality design on sites that can sustain taller development. This reference should be deleted. At the very least, it should be clarified that it represents a purely indicative parameter, and that different approaches may be appropriate on different sites on a case by case basis.</p>	NC*	<p>The Council considers that 3-10 storeys is an appropriate height range for ‘Flyover Edge’ sites within Old Town. Describing the range as “typical” allows for some flexibility within development proposals.</p>

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93.	2			<p>Section 3.3.24 This section states that the architecture of 'Flyover Edge' buildings should "conform" to a range of architectural parameters.</p> <p>The purpose of the Masterplan is not to seek conformity with a range of parameters. Rather, the purpose of the Masterplan, as stated in section 2.2.3, is to put forward indicative parameters as a means of guidance. The language of 'conformity' however, suggests prescriptive and inflexible standards. It should not be used in the context of the Masterplan.</p>	NC*	<p>This section provides flexible guidance and is not prescriptive or restrictive.</p>
94.	2			<p>Section 3.3.24 This section then goes on to list a number of highly restrictive requirements that 'Flyover Edge' proposals should 'conform' with. These include: The architecture should be a continuation and evolution of the Old Town character, not contrast with it.</p> <p>This suggests the existence a single, unified Old Town character across the entire Masterplan area. This is inappropriate, as significant sections of the masterplan area (e.g. Tamworth Road) have no strong underlying character. Indeed, the "mixed and fragmented character" of the Tamworth Road area is acknowledged in section 2.5.13 of the Draft Masterplan.</p>	NC*	<p>Whilst there is some variety in the character of the built environment of the Old Town Masterplan study area (as described in Old Town Today 2.5.9-2.5.22), there is also a unifying and predominant historic character to the whole of the area which distinguishes it from other parts of the Opportunity Area. The Old Town Masterplan seeks to strengthen the historic character of the area as outlined in chapters 2 and 3.</p> <p>The draft masterplan describes the Tamworth Road <u>character area</u> as having a "mixed and fragmented character", not Tamworth Road alone. The development and component parameters describe how this fragmented character can be improved through sensitive development of sites that do not currently make a positive contribution to the conservation areas.</p> <p>The guidance provided is not prescriptive or restrictive. It will ensure that development respects the heritage assets of old town.</p>

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95.	2		<p>Furthermore, this rejection of contrasting architectural approaches is a direct contradiction of the OAPF, which celebrates contrast. The OAPF states that “the dramatic juxtaposition of scale, character and appearance” is “one of the COA’s most defining characteristics” and that “In the future this design characteristic can be supported where it achieves a high quality design”<sup>5</sup>. The emphasis in Masterplan guidance should be on the achievement of high quality design. The wording of this bullet point however, restricts the potential to achieve high quality design by limiting architectural approaches to the “continuation and evolution of the Old Town character”.</p>	NC*	<p>The Old Town Masterplan does not conflict with guidance in the OAPF and the statement quoted from the OAPF has been taken out of context. The OAPF defines that tall buildings would not be appropriate within the Old Town Masterplan study area and that buildings up to 12 storeys could be appropriate adjacent to infrastructure (which includes flyovers). The OAPF identifies the heritage assets of Old Town and describes how they should be preserved.</p> <p>High quality design is already emphasised in the Old Town Masterplan.</p>
96.	2		<p>The masterplan states that, “Buildings should not seek to stand out as ‘icons’ in the streetscape as this will place them in conflict with Old Town’s local landmark, Croydon Minster.”</p> <p>The Masterplan should not seek to diminish the potential for iconic architecture. Iconic architecture can significantly enhance the setting and wider perception of the area, and would not necessarily conflict with views of the Minster. There is already policy in place to protect views of the Minster.</p> <p>The above bullet points are inappropriate for the reasons outlined and should be deleted.</p>	NC*	<p>Croydon Minster is one of Croydon’s few grade I listed buildings of outstanding architectural and historical significance. It makes an extremely important contribution to the character and visual appearance of Old Town and Croydon Town Centre more widely. The setting of the Minster and views of the church are protected and should not be dominated by neighbouring iconic architecture.</p>

<sup>5</sup> Croydon OAPF, paragraph 3.24

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97.	2		<p>Section 3.3.25 Refurbishment and Re-use This section begins by stating that “The presumption will be towards retention and refurbishment of buildings within conservation areas”. It is important however, that the Council does not pre-judge proposals involving buildings within conservation areas. The NPPF requires planning authorities to take a balanced approach to such proposals. Refurbishment and re-use may not always be the most appropriate option.</p> <p>The text of this section should be amended as follows: “The presumption will be towards retention and refurbishment of buildings within conservation areas will be encouraged, in line with the development guidelines in the Conservation Area General Guidance (2013), but may not always be the most appropriate option”.</p>	NC*	<p>Croydon Council guidance for conservation areas recognises that demolition of a building that makes a positive contribution to a conservation area usually constitutes substantial harm to the conservation area.</p> <p>The existing text in the Old Town Masterplan adequately defines that retention and refurbishment is the strongly preferred option but the use of the word “towards” indicates that demolition could be considered if an applicant can justify that substantial harm would not be caused to a conservation area. This detail is not necessary to include in the Old Town Masterplan as it is provided in the Conservation Area General Guidance SPD (2013).</p>
98.	3.2		<p>Improvement of Old Town will add a special dimension to Croydon that will differ from its cold concrete image. New buildings would benefit the street scene if it is in keeping with Victorian/Georgian heritage, and enhanced using brick and decorative features to windows and doors for character/creating attractive neighbourhoods.</p>	S*	
99.	3.3		<p>To preserve the heritage feel, to compliment the Minster and keep to human scale, any new building in Old Town would be no higher than the nave of the Minster.</p>	S*	

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100	15.3			The draft Masterplan identifies that the Old Town will transition with the wider Metropolitan Centre at the 'Flyover Edge' sites. It is considered that residential densities should be optimised in these fringe locations, given the need to preserve the built form and density within the Old Town itself. It is appropriate that development in these edge sites should take their design cues from the predominant material palette within the Old Town, but proposals for taller buildings on these flyover edge sites should be assessed on their own merits and their impact upon key local views in the Old Town.	NC*	It is not considered that development should be optimised at fringe locations as these are also part of the Old Town Masterplan study area and also lie adjacent to other low-rise residential areas which high density development could have an imposing and adverse impact on.  All planning applications will be assessed against relevant policy and guidance.
101	44	3.3.16 – 3.2.24		The flyover sites form an important part of the setting of the conservation areas.	C*	The following text has been added to the end of 3.3.16: <i>There may be the opportunity for an increased scale of development at flyover edge sites than in other areas of Old Town, but these sites also form an important part of the setting of the conservation areas in Old Town and also the Laud Street Local Area of Special Character that lies to the South of the Croydon flyover.</i>
102	21A		51	The bottom right-hand photograph is misleading as it refers to car parking without showing that such parking would make the building considerably less attractive	C*	Photo has been replaced with one that includes a car.
103	21A	3.3.8	52	Reference should be made to replacement window frames being of wood if the originals were.	C*	This guidance for changes to traditional buildings is provided in the Conservation Area General Guidance SPD and the Conservation Area Appraisals and Management Plans for the conservation areas that lie within Old Town. Text has been added to signpost this information:  <i>3.3.3.....The development parameters should also be read in conjunction with the Conservation Area General Guidance</i>

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						<i>SPD (2013)</i> . Please see the CAAMPs and the CAGG for guidance on alterations to historic buildings – such as replacement windows and extensions.
104	21A	3.3 .8	53	An active frontage to a development site on Scarbrook Road would benefit the street scene on the site to the rear of 70-88 High Street, however, this is not indicated on Figure 22: Townscape focal points and key development frontage plan.	C*	Figure 22 has now been removed because it does not cover all sites and is prone to being misinterpreted.
105	21A	3.3 .8	54	Whilst in the main approving the insertion of shopfronts Surrey Street with its market character could quite legitimately include shops straight on to the street	NC*	The stallrisers of shopfronts have historical significance and therefore their preservation is important.
106	21A	3.3 .8	54	The Masterplan emphasises the lack of open space in the Old Town and unless family accommodation can be provided with adequate gardens, (unlikely with the price of land in the centre of Croydon), the area would not appear to be appropriate for such accommodation. And expecting families to bring up children in flats is hopefully now historic having been tried in the 1960s and failed.	NC*	There are examples of successful flatted family developments, particularly in Europe. If the flats are of a good size, with good access arrangements and maintenance they can provide attractive family accommodation.  Furthermore, the Old Town Masterplan emphasises the importance of increasing play facilities in Old Town for children and protecting and improving greenspaces and access to them.
107	21A	3.3 .23	59	The Masterplan emphasises the human scale of most of the Old Town and condemns the high rise buildings which have been allowed to intrude into it in the past. 10 storeys is far too	NC*	The principle of potentially allowing up to 12 storey accommodation next to infrastructure, subject to it being of a high quality design, has already been established in the OAPF. The Old Town Masterplan provides more specific guidance for the Cairo New Road site and states that a development up to

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				high even on the edge of the Old Town and by including such a figure leaves the area vulnerable to yet more inappropriate development		10 storeys high would be appropriate. However, both the OAPF and the Old Town Masterplan stress that any proposed development must be designed sensitively to respect the historic environment, designated heritage assets and neighbouring buildings that are of a much smaller scale.
108	21A	3.3 .24	59	<p>Whilst brick is normally very homely and follows much of the building in the Old Town it can have an overpowering effect in the case of large or tall buildings.</p> <p>And whilst balconies can help to break up a façade when cluttered with washing, bicycles, children's toys etc. they can be very ugly</p>	NC*	<p>Brick is a traditional material that is considered appropriate for development within the historic environment. However, every planning application that is made subsequently to the adoption of the Old Town Masterplan will need to demonstrate that any proposed scheme will not have an undue imposing impact on neighbouring sites through the choice of materials for it.</p> <p>Balconies provide necessary private amenity space for flatted developments. Flatted developments are all required to provide cycle storage that is separate from the flats at ground floor level.</p> <p>The Old Town Masterplan does not have the remit to provide guidance on the behaviour of owners and occupiers of properties.</p>
109	21A			Although probably outside the Council's control the Panel feel strongly that decoration and maintenance of the properties in the Old Town is important and should be encouraged and indeed emphasised in the Masterplan and any chance to provide grants should be taken.	NC*	Whilst it is recognised that maintenance is an issue, planning guidance cannot cover this issue in detail. Some guidance on maintenance is provided in the CAAMPs for the conservation areas within Old Town and it is not required to be repeated here.
110	19A.1			Congestion, traffic chaos, parking concerns, signage, threats of loss of right of light, overlooking and insensitive development by aggressive developers.	NC*	The Draft Old Town Masterplan provides guidance on traffic and parking in the Movement Parameters 3.4. Urban Design Policy in the NPPF and the Croydon Local Plan provides guidance on overlooking and rights to light.
111	21A			Educate and inform landowners about value of appropriate repairs, renewals and redevelopment.	NC*	The CAAMPs for the Old Town conservation areas provide some guidance on appropriate repairs and alterations. It is not within the remit of the Old Town Masterplan to provide guidance for property maintenance.

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				Location is important but so are character, heritage and complementary design.		The Development Parameters (Section 3.3) stress this point.
112	36A.1			<b>Refuse</b> Remove / replace large wheelie bins from the road as most properties have no side entry. Bins in garden have to be carried through the house.	F*	Waste management is not part of the remit of the Old Town Masterplan (see response to comment 1). However, this comment will be passed on to the Council's Waste Management Service.
<b>Movement Parameters</b>						
113	4.6			Paragraph 3.4.3 outlines the proposals for enhancing pedestrian routes within Old Town to improve connections to destinations within the surrounding area, such as Wandle Park, North End and South Croydon. Enhancements are planned for a number of key pedestrian routes such as the inter-linked route from the Minster to North End via Church Street and Drummond Road. CLP welcomes all enhancements to pedestrian access in and around Old Town, particularly to and from North End.	S*	
114	4.7			Paragraphs 3.4.4 to 3.4.6 describe proposals to improve cycling facilities through Old Town and beyond. A number of routes are put forward for proposed improvements including three routes connecting Old Town with North End. As above, CLP welcomes these improvements, which will strengthen accessibility and connectivity through the Old Town and into the Retail Core for residents	S*	

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				and visitors alike.	
115	4.8			Paragraph 3.4.10 notes several options for enhancing the vehicular access to and from Old Town. Whilst CLP supports these aspirations (and others that accord with these aims and ambitions), the draft Masterplan should note that any proposals which come forward which result in a modification to the way vehicles circulate to, from and within Old Town should not prejudice vehicular access to the Retail Core and wider CMC area. Maintaining flexibility is the key to ensuring that the vehicular movement functions properly.	<p>C*</p> <p>The Croydon OAPF encourages the comprehensive redevelopment of parts of the CMC and the sensitive development of the Old Town area due to the many heritage assets located in the area.</p> <p>The Council does not consider the success of both Old Town and the Wider CMC area to be mutually exclusive. The Old Town Masterplan sets the strategic framework for the future development of Old Town. It states a desire for the retail in Old Town to complement that of the retail core. Through the assessment of individual planning applications for future development potential specific impacts will be analysed and relevant policy and guidance will be weighed up and applied to the determination of the applications.</p> <p>.</p> <p>The following text has been added to OT 12:</p> <p><i>CONTEXT:</i>  <i>Drummond Road provides vehicular access from the Centrale shopping centre car park and service area.</i></p> <p><i>PARAMETERS:</i>  <i>Vehicular access from the Centrale shopping centre should be maintained.</i></p> <p><i>Any traffic management proposals that come forward will be subject to detailed design and public consultation at that time. However, it is not anticipated that these would prejudice vehicular access to the retail core and wider CMC area. Para. 3.4.10 needs to be read in conjunction with para. 3.4.9, which makes it clear that the objective of any such proposals would</i></p>

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						<i>be to improve accessibility and reduce traffic congestion at Reeves Corner.</i>
116	44			Traffic travelling to the Centrale car park has a detrimental impact on nearby residents.	C*	The following text has been added to p65 after 3.4 14:  <i>If the Centrale shopping centre is redeveloped, then altering the design of the access to the car park would be encouraged to minimise vehicle queues in Tamworth Road and the detrimental impact of vehicular traffic on nearby residents.</i>
117	4.9			The component identified as 'OT1' includes the section of Church Street which runs from East to West through Old Town, as well as Crown Hill, a key threshold between Old Town and the Retail Core at North End. Objectives for this area include:  i. drawing people down from the busy shopping street of North End; ii. creating public space at Crown Hill in which people can stop and spend time in; and iii. improving cycle movement through the area.  CLP supports these objectives, and welcomes all improvements to the public realm at this important threshold.	S*	
118	4.1			Paragraph 2.3 sets out the Council's vision for the Old Town. These aspirations include that the Old Town Masterplan area be well integrated with the town centre and with surrounding neighbourhoods, as well as being accessible, enjoyable and safe to walk and	S*	

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				cycle to and around. CLP welcomes this approach as well as further improvements to the permeability of the Old Town and beyond.		
119	28.2			Strongly agree current signage to car parks is inadequate and this should be addressed as a matter of urgency given the impending redevelopment of the Whitgift Centre.	S*	
120	19A.3			Consider park and ride outside the area or make the cost of short term parking attractive to make use of the over-capacity of parking.	NC*	A park and ride scheme could not be considered solely in the context of Croydon Old Town. Any such scheme would need to be based on a much wider area. It would therefore have a regional impact and consequently is not within the remit of a masterplan.
121	19A.4			More safe parking for bicycles and motorcycles with covered cages and ground anchors etc. CCTV.	C*	<p>The text AFTER 3.4.17 has been changed to state the following:</p> <p><i>Cycle and Motorcycle Parking</i></p> <p><i>There should be an aim to significantly increase the amount of cycle parking provision within Old Town, which is sufficient to both meet demand and encourage an increase in cycling to the area. Cycle parking should be high quality, safe and secure and located as close as possible to the key destinations within Old Town, such as the retail and commercial areas, the Minster, community facilities, etc.</i></p> <p><i>Additional safe and secure motorcycle parking should be provided to encourage motorcycle use. Encouraging motorcycle use is likely to help reduce car use, as motorcycles take up less roadspace and generate fewer carbon emissions than most cars.</i></p> <p><i>CCTV could be considered to increase security for parked</i></p>

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						<i>bikes and motorcycles in appropriate locations.</i>
122	19A.5			Encourage 2 wheelers instead of 4 wheeled vehicles for the sake of space / congestion / pollution / public transport.	C*	Section 4 has been amended to stress this point.
123	18.4			<p>Summary: Residents can have trouble finding a free car park space during busy times for local school and shops.</p> <p>I cannot agree that there is an over provision of parking in Old Town, during school drop-off and collection, or event days plus weekend shopping days. We need our parking spaces. We also need to retain parking spaces outside our homes rather than having to cross the road with shopping and a child to access the <b>safety</b> of our homes.</p>		<p>The text on car-parking has been amended to stress that there is over-provision of <u>off-street</u> car parking but not a shortage of on street public car parking:</p> <p><i>2.8.15 There are a number of off-street car parks located in Old Town as well as on-street parking on many of the residential roads.</i></p> <p><i>2.8.16 The larger privately owned off-street car parks are at the Centrale shopping centre, Q Park in Charles Street and the NCP car park on Wandle Road.</i></p> <p><i>2.8.17 Croydon Council also operates a number of smaller off street car parks: Wandle Road surface car park, Jubilee Bridge car park and Ann's Place car park which has two sites on Drummond Road. At present, signage and links to these car parks are also poor and should be improved.</i></p> <p><i>2.8.18 The Croydon Opportunity Area Planning Framework (OAPF) guidance identifies an over-provision of off-street parking within the Croydon Metropolitan Centre. It sets out a policy of ensuring that off-street car parking spaces are in suitable locations, easy to access and of high quality, rather than seeking to increase parking levels. It also outlines options for the location of parking for two potential future scenarios: One scenario where the retail core of Croydon Metropolitan Centre is redeveloped and one where this does not occur. Please see the Croydon OAPF for further details.</i></p>

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					<p><i>2.8.19 The existing on-street parking is well-used.</i></p> <p>It should be noted that Old Town has a Public Transport Accessibility Level (PTAL) of 6. This indicates a very high level of public transport provision in the area, which is likely to be able to meet a large proportion of the travel needs of Old Town residents and visitors. Correspondingly it also indicates that there is much less need for residents of Old Town to own or use a car on a regular basis than in other areas of the Borough with a lower PTAL. Certainly, the Council would seek to discourage the use of a car for journeys to local schools and shops within the area.</p> <p>The text has been amended to state the following.</p> <p><i>3.4.19</i>  <i>When planning the provision of on-street parking and who should be eligible to use it, the needs of residents to be able to park close to their homes should be balanced against the needs of visitors to the area to have access to an appropriate level of car parking provision.</i></p>
124	26.1			Guard rail has been installed at the junction between Latimer Road and Waddon Road which is ugly and prevents pedestrian access.	Latimer Road lies outside of the Old Town Masterplan area.
125	36A.2			Ban Old Palace School parents traffic by creating a designated drop off point on Charles Street.	NC* It is considered that Old Palace Road and Howley Road have the capacity to accommodate traffic created by the school. The Council has no powers to ban parents from driving their children to and from school. Neither has it any powers to provide designated drop-off points for specific groups of drivers on the public highway. Any illegal parking by parents can be dealt with by the Council's Parking Enforcement Officers.

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126	28.4			Disagree with the statement that there is “over-capacity of car parking spaces in Old Town”.	C*	See response to comment 18.4 XXX
127	21A			Car parking is inaccessible and expensive.  There is poor signage (hence the under-utilization of Jubilee Bridge and other car parks)  Retail relies on suitable and inexpensive car parking which is lacking in Croydon.	NC*	Improving accessibility within Old Town and signage to the Old Town car parks is endorsed by the Old Town Masterplan.  The remit of the Old Town Masterplan is to provide guidance for the built environment and it cannot address management issues such as car parking charges, although it is acknowledged that such factors will have an impact on car park useage and traffic coming in to Old Town. However, it is not accepted that retail relies on suitable and inexpensive car parking. A Council study at the Whitgift Centre in 2012 [that around 75% of shoppers travel to Croydon by non-car modes.
128	3.4			Plans for more pedestrian access routes across Roman Way, and it's “greening” asap will help to counter the disconnected feeling.	S*	
129	44			Low speed driving should be encouraged in Old Town to increase safety and reduce noise from vehicles.		The following text has been added to the Movement Parameters:  <i>Speed limits</i> <i>As a traffic calming measure, on all streets except dual carriageways the speed limit of Old Town should be reduced to 20 mph to improve safety and reduce the noise impact of traffic.</i>  <i>The speed limit of Roman Way should be reduced from 40 mph to 30 mph and the speed limit on the Croydon Flyover should remain 30 mph.</i>
130	41.1			Reinforcing the spaces around the Minster and the great sense of permeability are important	S*	

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Improving vehicular access from Roman Way in to the centre of Old Town					
131			<p>Ten residents have objected to the <del>changes</del> proposed changes to the road network to improve vehicular access from Roman Way in to the centre of Old Town – in particular the Q-Park car park:</p> <p>A. Introducing a new right turn in to the centre of Old Town from Roman Way for northbound traffic either on Salem Place OR on Cranmer Road. (There are already left turns available in to both of these roads)</p> <p>B. Converting the section of Church Road between Reeves Corner and Charles Street from 1-way to 2-way (no road widening required).</p> <p>C. Converting the section of Charles Street between the Q-Park car park and Church Road and to two-way. This would require widening the road that was narrowed in 2011. It will also require removing trees and some of the footway and shared-surface cycle route that was installed in 2012.</p> <p>It should be noted that objection to these proposals was not unanimous. One resident supported the proposal in writing and two expressed support for the proposals at the consultation events.</p> <p>The comments have been summarised below with responses provided for each separate</p>	C*	

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				point raised:		
				1. There will be a substantial increase in traffic to the area	N C* + C*	<p>A distinction needs to be drawn between traffic increases that could result from proposals in the Masterplan and increases that could occur now or at any time, with or without a Masterplan for the area. In particular, it should be noted that the presently underused spaces in the Q-Park car park already have a legitimate planning permission, and action could therefore be taken at any time by the owners of Q-Park (e.g. reduced parking charges) or the Council (e.g. improved signage) to fill those spaces. Whilst such action would lead to an increase in traffic in the area, it is not considered that, given the number of spaces and their likely turnover during the day, such an increase would be significant. Indeed, the traffic impacts of a fully utilised Q-Park car park would already have been taken into account by the Council when granting the original planning permission for it.</p> <p>Regarding traffic increases that could result from proposals in the Masterplan, transport consultants have assessed the strategic aspirations of the masterplan and their view is that there will not be a significant increase in vehicular traffic in any part of the Old Town Masterplan study area. The following key factors have led to this conclusion: There is no major development proposed in the area; no through routes are being created; no additional on- or off-street car parking capacity is being proposed; there are several other car parks in Old Town in addition to Q-Park and so not all vehicles are likely to use Q-Park. In addition, any proposals that are progressed to a detailed design stage will be subject to further traffic modelling, full public consultation and a safety audit.</p> <p>This information is now more clearly conveyed in the</p>

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					<p>masterplan.</p> <p>The following text has been inserted at the beginning of the movement parameters section on p61 – 3.4.1:  <i>The movement parameters in the masterplan are strategic aspirations and support the objectives of the masterplan. They have not been designed in detail; however, Croydon Council has satisfied itself that they would be deliverable.</i></p> <p><i>The implementation of any of the proposed changes to the movement network in the masterplan would be subject to detailed design, which would include safety audits and traffic modelling where required and further public consultation. In addition, any adverse impacts identified through the detailed design process would need to be satisfactorily ameliorated.</i></p> <p>The following text has been inserted in to 3.4.12:  <i>None of the above traffic management proposals would lead to a significant increase in vehicular traffic in Old Town, as no new through routes are being created. Also, there is no major development proposed in the area and no additional on- or off-street car parking is being proposed. In addition, vehicles travelling to and from the Q-Park car park would have three routes to choose from and there are several other car parks in Old Town that a proportion of visitors will be likely to use instead of Q-Park. However, if proposals are progressed to a detailed design stage their delivery will be subject to the following: Traffic modelling to demonstrate that vehicular traffic flows can be accommodated satisfactorily, without unacceptable congestion and delay; a road safety audit to demonstrate that there would not be an adverse impact on safety and further public consultation.</i></p> <p>The benefits of improving vehicular accessibility to the Q-Park</p>
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					car park are also now more clearly outlined in the masterplan within 3.4.12: Increasing the use of Q-Park car park is likely to increase footfall within Old Town which in turn is likely to support the local economy by increasing passing trade for local businesses in the area.
				2. Rat-runs will be created.	NC* Transport consultants have assessed the proposals and concluded that rat runs would not be created by them.
				3. There will be an increase in traffic at night time because the car park is 24-hour access.	NC* The car park already operates 24-hours a day and hence increases in its use could occur at any time, irrespective of whether or not there is a Masterplan for Old Town. However, transport consultants have assessed the proposals and their view is that there will not be a substantial increase in traffic in the area at night. If proposals are progressed to a detailed design stage their delivery will be subject to the following: Traffic modelling to demonstrate that there would not be unacceptable increases in traffic volumes and congestion; a safety audit to demonstrate that there would not be an adverse impact on safety and further public consultation.
				4. The roads do not have the capacity for additional traffic, much of which is created by taking and collecting girls from Old Palace School.	NC* Transport consultants have concluded that the roads have sufficient capacity to accommodate any additional traffic arising from the Masterplan proposals. They have also assessed the strategic aspirations of the masterplan and their view is that there will not be a significant increase in vehicular traffic in any part of the Old Town Masterplan study area. Furthermore, the Council -through the Old Town Masterplan and other strategies - seek to reduce unnecessary car use wherever possible. If proposals are progressed to a detailed design stage their delivery will be subject to the following: Traffic modelling to demonstrate that there would not be unacceptable increases in traffic volumes and congestion; a safety audit to demonstrate that there would not be an adverse impact on safety and further public consultation.

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				5. The proposals unfairly prioritise the needs of visitors and businesses over residents.	NC*	It is not accepted that the Masterplan prioritises the needs of visitors and businesses over residents. Improving vehicular access from Roman Way to Old Town will improve local accessibility for residents as much as for visitors and businesses. In addition, Old Town lies within Croydon Town Centre that includes commercial premises and serves a wide area. Therefore its road network should be designed to include legible routes for visiting vehicular traffic as part of a mix of movement improvement proposals. However, other more sustainable modes of transport are supported. The Old Town Masterplan strongly encourages improvements to walking and cycling provision as well as bus waiting facilities.
				6. The traffic will have a harmful impact on the environment and residents' experience by creating noise and air pollution.  Properties on Cranmer Road and Church Road will be particularly affected as these properties have a small set back from the street.	NC* and C*	Transport consultants have assessed the proposals and their view is that there will not be a substantial increase in vehicular traffic in the area, or a substantial increase in noise and pollution. The car park would have 3 routes to it and traffic would be shared between these. In addition there are several other car parks in Old Town. If proposals are progressed to a detailed design stage their delivery will be subject to the following: Traffic modelling that would need to demonstrate that there would not be unacceptable increases in traffic volumes and congestion; a safety audit to demonstrate that there would not be an adverse impact on safety and further public consultation. Furthermore, the masterplan proposes measures to introduce traffic calming that will reduce noise. Additional tree planting is also proposed to help absorb air pollution.  It is acknowledged that it is likely that a new right turn from Roman Way on to Cranmer Road would have a greater impact on Cranmer Road residents than a new right turn from Roman

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					Way in to Salem Place would have on the residents of Salem Place. The Masterplan has been amended to state that a new right turn from Salem Place is the preferred option:  3.4.12 has been amended to state the following: <i>A new right turn could be created from Roman Way into either Salem Place or Cranmer Road to improve access in to the centre of Old Town and Q-Park car park from Roman Way. Salem Place is the preferred option for the right turn because Salem Place is wider than Cranmer Road and the properties on Salem Place are more set back from the street than those on Cranmer Road.</i>	
				The increased traffic will create more crime in the area.	N *	There is no evidence to support the view that increases in traffic flows lead to increased crime levels in an area. It is considered more likely that it would lead to a reduction in crime levels due to increased street use and natural surveillance.
				7. That the benefits would not be significant, because the journey time would only be marginally reduced.	NC*	As set out in para. 3.4.9 [CHECK THIS IS THE CORRECT PARA NO.] of the Masterplan, the main objective of the vehicular movement proposals is to improve accessibility to the area and reduce the overall impact on Reeves Corner. The proposals are not intended to lead to reduced journey times for vehicular traffic per se. At a strategic masterplanning level the public benefit of these changes is considered to be of good value, however, further consideration of the benefits and disbenefits of any movement proposals would be undertaken at the a detailed design stage.
				There is not an issue that requires addressing as drivers do find their way. Evidence of this is that when the car park prices were lower, traffic used to queue along Charles Street.	NC*	Research conducted for the production of the Old Town Masterplan indicated that visitors to the area find it difficult to access Q-Park car park.
				8. The current route for traffic to access Q-Park along Charles Street was designed for a higher volume of traffic than Cranmer Road and Church Road because the properties are	NC*	Vehicles will still travel along Charles Street but other streets have the capacity to accommodate additional vehicular traffic. If proposals are progressed to detailed design stage their delivery will be subject to a traffic modelling that would need to

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			more set back from the road than on Church Road and there is parking to the rear of the properties.		demonstrate that there would not be unacceptable increases in traffic volumes and congestion.
			9. Increased traffic would make the roads unsafe for children, who play in the streets, and pets.	NC*	It is not advisable to allow children to play on the carriageway of any street, irrespective of its traffic flow. If children play on the footway, then the level of traffic flow in a street is not an issue. All proposals that come forward to a detailed design stage would be subject to a safety audit to demonstrate that there would not be an adverse impact on safety and full public consultation.
			10. The roads are narrow and there would be an increased likelihood of accidents. Vehicles already mount the <del>curbs</del> kerbs on Church Road sometimes when passing each other.	NC*	Salem Place, Cranmer Road and parts of Church Road are two-way streets presently and have the capacity to accommodate additional traffic. If the strategic aspirations of the masterplan are progressed to a detailed design stage they will be subject to a safety audit and traffic modelling which may conclude that amendments are required to the road and footway layouts if the changes are to go ahead.
			11. The pavements are narrow and increasing the number of vehicles would reduce safety for pedestrians – in particular children, pets, the elderly and mobility impaired people.	NC*	If the strategic aspirations of the masterplan are progressed to a detailed design stage they will be subject to a safety audit which may conclude that amendments are required to the road and footway layouts if the changes are to go ahead.
			12. On Church Road some properties have driveways that cars reverse out of which would contribute towards congestion.	NC*	It is not advisable for drivers to reverse out of private driveways onto the public highway, which is inherently dangerous due to limited visibility of pedestrians and traffic using the street. Drivers should always reverse into a driveway and exit in a forward-facing direction with clear visibility. However, it is not accepted that an occasional car reversing from a driveway onto Church Road currently leads to any serious problems of traffic congestion, or that it will do so in the future as a result of the movement proposals set out in the Masterplan.

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				13. There is likelihood that cars would exceed speed limits.	NC*	<p>This is not accepted. It is not considered that any of the vehicular movement proposals set out in the Masterplan are likely to encourage an increase in vehicle speeds in Old Town. In fact, the masterplan proposes traffic calming measures to reduce the speed of vehicles.</p> <p>If the strategic aspirations of the masterplan are progressed to a detailed design stage they will be subject to a safety audit which may conclude that amendments are required to the road and footway layouts if the changes are to go ahead.</p>
				14. Parking bays would be likely to be used by visitors preventing residents from being able to park.	NA*	This is a parking management issue and not part of the remit of the Old Town Masterplan which is a strategic document for the redevelopment of the built environment.
				15. Resident parking bays would be threatened to give vehicles enough width on the road.	NC*	<p>The masterplan includes the aspiration that on-street parking spaces would not be reduced as part of any changes to the road network to improve vehicular access from Roman Way in to central Old Town:</p> <p>3.4.12 states the following: Some revisions to on-street parking would be required but are not expected to lead to a change in the number of on street parking spaces.</p>
				16. It will be an unfair imposition on a community still recovering from the riots.	NC*	Transport consultants have assessed the proposals and their view is that there will not be a substantial increase in vehicular traffic in the area. The car park would have 3 routes to it and traffic will be shared between these. In addition there are several other car parks in Old Town that visiting traffic would use. If proposals are progressed to detailed design stage their delivery will be subject to a traffic modelling that would need to demonstrate that there would not be unacceptable increases in traffic volumes and congestion

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			17. The junctions between Cranmer Road and Church Road; and Charles Street and Church Road are not wide enough to accommodate additional traffic.	NC*	<p>At a strategic masterplan level of assessment, this is not considered to be an issue.</p> <p>If the strategic aspirations of the masterplan are progressed to a detailed design stage they will be subject to traffic modelling and a safety audit which may conclude that amendments are required to the road and footway layouts if the changes are to go ahead.</p>
			18. Crossing the road will become more dangerous.	NC*	<p>At a strategic masterplan level of assessment, this is not considered to be an issue.</p> <p>If the strategic aspirations of the masterplan are progressed to a detailed design stage they will be subject to a safety audit which may conclude that amendments are required to the road and footway layouts if the changes are to go ahead.</p>
			19. Utilities are regularly being dug up on Church Road which would cause congestion.	NC*	This is a highways management issue and not part of the remit of the Old Town Masterplan which is a strategic document for the redevelopment of the built environment.
			20. There is poor visibility between Roman Way and Cranmer Road. The existing left turn in to Cranmer Road from Roman Way for Southbound traffic is dangerous.	NC*	<p>The left-turn from Roman Way to Cranmer Road is an existing movement and not a proposal contained in the Masterplan. Any safety concerns at this location should be referred to the Council's Traffic Management Team.</p> <p>However, the masterplan proposes that traffic speeds on Roman Way are lowered which will increase safety at the junction with Cranmer Road.</p>
			21. It will be a waste of public money to remove the recently installed public realm on Charles Street.	C*	<p>The cost-benefit analysis work conducted at a strategic masterplanning level demonstrates that the proposals would be of public benefit and good value. However, further cost-benefit analysis will be required should this strategic aspiration be taken to a detailed design stage.</p> <p>The masterplan has been amended to state clearly that public realm of an equal quality to the existing public realm on</p>

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					Charles Street would be installed.  The following text has been added to 3.4.12: <i>Converting the section of Charles Street from one-way to two-way will require widening the road and reducing the width of the footway on the southern side of road which is a shared surface cycle route. The public realm treatment and cycling provision of the remodelled footway should be of the same high quality as the existing public realm.</i>
				22. If the Council is arguing that the increase in traffic will not create significant additional traffic in the area, then the investment in changing the road layout cannot be justified.	NC* As set out in section 3.4 of the finalised masterplan, the main objective of the vehicular movement proposals is to improve accessibility to the area and reduce the overall impact on Reeves Corner. Any investment will therefore need to be justified in the context of achieving those objectives.
				23. The Church Road footway is uneven.	F* This is a maintenance issue and therefore not relevant to the Old Town Masterplan. It has been forwarded to the Council's Highways Service.
				24. Prevent vehicles from turning left from Charles Street in to Church Road as this is unsafe	NC* Accident data does not show this to be an unsafe manoeuvre.
				25. Cars travel fast along Charles Street to reach the car park and would do the same along Church Road if this route to the car park was provided.	NC* It is not considered that any of the vehicular movement proposals set out in the Masterplan are likely to encourage an increase in vehicle speeds in Old Town. In fact, the masterplan proposes traffic calming measures to reduce the speed of vehicles.
				26. Existing signage is poor. Improving it will solve the problem.	C* The masterplan has been amended to make this point more clearly.  3.4.12 now includes the following bullet point: <i>To improve legibility for drivers travelling from Roman Way to Q-Park car park, signage should be improved as a short-term priority.</i>

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					<p>Now: OT21, 3.7.11, p70. The final sentence now reads: Signage is improved to the Old Town car parks.</p> <p>OT21</p> <p><i>OBJECTIVES</i>  <i>Improve legibility of routes for drivers in to central Old Town and its car parks.</i></p> <p><i>PARAMETERS</i>  <i>Better signage to central Old Town and its car parks on Roman Way.</i></p>
			<p>27.Rerouting traffic that comes from Salem Place along Scarbrook Road instead of Church Road would cause less disturbance to residents and be less expensive to implement because Scarbrook Road is already two-way.</p> <p>Scarbrook Road is also policed.</p>	C*	<p>This is a potential option to improve access in to Old Town and has been included in the masterplan.</p> <p>The following text has been deleted:          This arrangement would remain to avoid creating a</p> <p>The existing two-way southern section of Church Road would remain two-way. At present all southbound traffic on Church Road is currently directed via Salem Place to Roman Way and there is no access via Scarbrook Road to Wandle Road. This arrangement would remain to avoid creating a southbound through route from Reeves Corner to Wandle Road.</p> <p>The following text has been added:  <i>As an alternative to enabling two-way traffic on Charles Street vehicular access could be reintroduced from Church Road to Scarbrook which has the capacity for two-way traffic. A no-right turn sign could be introduced at the junction with Wandle Road to prevent the creation of a through-route.</i></p>

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			28. The Next Steps chapter should include a full analysis of current and projected parking stress, also current and projected traffic levels and noise pollution, to further assess the detrimental impact for the residents in Old Town.	C*	<p>This research was conducted as part of the OAPF and it is not necessary that it is repeated.</p> <p>The following changes have been made to the movement parameters to provide additional clarity on the next steps:</p> <p><i>3.4.12 All changes to the road network and cycling routes are subject to detailed design, safety audits and potentially transport modelling.</i></p> <p>Final bullet point of 3.4.12: <i>All changes to the road network to improve vehicular access in to Old Town to Roman Way will be subject to detailed design, traffic modelling, further public consultation and a safety audit.</i></p>
			29. A park and ride scheme is an alternative suggestion.	NC*	<p>A park and ride scheme could not be considered solely in the context of Croydon Old Town. Any such scheme would need to be based on a much wider area. It would therefore have a regional impact and consequently is not within the remit of a masterplan.</p>
			30. Charles Street was purpose built to accommodate traffic going to the car park	C*	<p>Traffic will continue to travel along Charles Street but can be accommodated elsewhere too. See above responses regarding the anticipated increase in the volume of traffic.</p>
			31. All comments above regarding changes to the road network.	C*	<p>The masterplan has been amended to state the following for clarity:</p> <p><i>3.4.12 All changes to the road network and cycling routes are subject to detailed design, safety audits and potentially transport modelling.</i></p> <p>Final bullet point of 3.4.12: <i>All changes to the road network to improve vehicular access in to Old Town to Roman Way will be subject to detailed design, traffic modelling and a safety audit.</i></p>

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Comments from each individual representation on the subject of improving vehicular access from Roman Way in to the centre of Old Town are provided below:

132	1A.1 9			<p>Summary: Concern about diversion of traffic in to Church Road will lead to an unacceptable increase in traffic and worsen the experience of the streets for residents of Church Road, Salem Place, Howley Road and Fawcett Road. Increasing the volume of traffic would be unacceptable for the following reasons:</p> <ol style="list-style-type: none"> <li>1) Incapacity - The road is already congested with vehicles taking and collecting school children of Old Palace School.</li> <li>2) Increased traffic volume will increase serious danger for children and pets that live in Church Road and Fawcett Road and the surrounding area and play in the street.</li> <li>3) There is an increased likelihood of accidents some of which could be fatal as: The roads already are unsafe with the current volume of traffic - are narrow with on street parking and cars reversing from the properties on the Eastern side of Church Road.</li> <li>4) There will be increased pollution.</li> <li>5) There is likelihood that cars will exceed speed limits as they do on Charles Street.</li> <li>6) Residents parking bays that are paid for could be taken up by visitors.</li> </ol>	(see above)	
133	1A.2			The pavements are uneven and not fit for purpose.	(see above)	
134	9.1			<p>-Children will no longer be able to play in the street because it will be unsafe. -Parking spaces that are shared between</p>	(see above)	

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				residents and pay and display will be taken up by visitors and unavailable to residents. This is already a problem.		
135	22.1			<ul style="list-style-type: none"> <li>-Already substantial amount of traffic during school collection times</li> <li>-It will reduce safety for children who play in the street.</li> <li>-It will reduce parking availability for residents.</li> <li>-The road is narrow. Already this means wing mirrors of parked cars facing in to the road are damaged and more traffic would increase this damage.</li> </ul> <p>-Alternative suggestion – park and ride scheme?</p>	(see above)	
136	23.1			<ul style="list-style-type: none"> <li>-Will reduce safety for children, the elderly, the disabled and pets</li> <li>-There is already a significant volume of traffic</li> <li>-There will be an increase in pollution.</li> <li>-The road is narrow. Already this means wing mirrors of parked cars facing in to the road are damaged and more traffic would increase this damage.</li> <li>-It will become a rat run.</li> </ul>	(see above)	
137	24.1			Will create a rat run in predominantly residential road and be unfair to impost on a residential community that was severely affected by the riots of 2011.	(see above)	
138	24.2			<p>Increased volume of traffic will mean the following:</p> <p>Safety will be compromised for parents and children when children are getting in to car seats next to door facing the road and other physically vulnerable groups – the elderly and</p>	(see above)	

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				disabled people.		
139	24.3			There will be more likely to be collisions with cars reversing from driveways on the Eastern side of Church Road – as the road is narrow and this is already a difficult manoeuvre for drivers to perform	(see above)	
140	24.4			Crossing the road would be more dangerous for people who have to park across the road.	(see above)	
141	24.5			24 hour access to the car park means that there would be increased traffic at night time	(see above)	
142	24.6			Increased noise pollution	(see above)	
143	24.7			It will reduce parking availability for residents.		
144	24.8			Poor visibility from Roman Way in to Cranmer Road (existing left turn is already unsafe). There would be an increased likelihood of collisions between cars on the road and parked cars.	(see above)	
145	24.9			Drivers turning in right in to Cranmer Road from Church Road cut of the corner and increasing traffic on this road would lead to increased collisions.	(see above)	
146	24.10			The junction between Cranmer Road and Church Road is not wide enough and large vehicles have to use both sides of the road and therefore need them both to be empty to be able to do this. Therefore congestion would be caused at this junction by increasing traffic.	(see above)	
147	24.11			Reduced safety for pedestrians: Because road	(see	

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				is narrow and there are a large quantity of dropped kerbs on eastern side of road, cars often mount the kerb to get past each other. This would be increased.	above)	
148	24.12			The road is narrow. Already this means wing mirrors of parked cars facing in to the road are damaged and more traffic would increase this damage.  On-street parking was removed from Charles Street a few years ago, probably to prevent cars being damaged, so this same logic should mean that cars should not be encouraged to travel down church Road.	(see above)	
149	24.13			There would be more vehicles travelling at unsafe speeds as vehicles travelling to the Q-Park car park travel tend to travel at unsafe speeds.	(see above)	
150	24.14			Junction between Church Road and Charles Street is tight which would lead to congestion.	(see above)	
151	24.15			The section of Charles Street between Church Road and Q-Park Car Park has recently been narrowed to increase safety and improve its visual appearance and widening it again would be environmentally and financially irresponsible.	(see above)	
152	24.16			There are utilities beneath Church Road in between Charles Street and Cranmer Road that are regularly being accessed which narrows the road further.	(see above)	
153	24.17			Alternative: Improve signage as a much cheaper option. This would prevent drivers getting lost trying to find Q-Park. Suggest 1) a	(see above)	

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			<p>sign before the Cranmer Road and Salem Place turns for cars travelling southbound down Roman Way to prevent cars turning left here. 2) a sign at the flyover roundabout. After getting this far existing signs are sufficient.</p> <p>Current signs say "Surrey Street Car Park" rather than Q Park Car Park which could be causing confusion.</p> <p>The fire station sign blocks the car park sign on Roman Way.</p>		
154	24.18		<p>Drivers getting lost is not a problem: Evidence of this is that prior to the Centrale car park opening there were queues to the Surrey Street and Wandle Road car parks. There are not queues today because people are using other car parks rather than getting lost.</p>	(see above)	
155	24.19		<p>If improving the signage is unsuccessful then Scarbrook Road could be made 2-way so that vehicles can get access to Charles Street this way. This would have a less detrimental impact on residents, because the properties on Scarbrook Road and Charles Street are further set back from the street and in some places.</p>	(see above)	
156	24.20		<p>Routing traffic along Scarbrook Road would have a lower detrimental impact to residents than routing it along Church Road because Scarbrook Road has a 24 hour access car park adjacent to it so residents of Scarbrook Road already accept a certain level of noise.</p>	(see above)	
157	24.21		<p>Routing traffic along Scarbrook Road and Charles Street would mean that the traffic would be easier to monitor because these</p>	(see above)	

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				areas are already policed.		
158	24.22			If traffic is routed down Scarbrook road then drivers will be able to access Wandle Road as well as Scarbrook Road car parks whereas if it is only routed down Church Road it will not be able to access the Wandle Road car park.	(see above)	
159	24.23			Scarbrook Road already has 2 lanes and so could be cheaply converted to be 2-way.	(see above)	
160	24.24			The existing route in to Q-Park car park is not a significant inconvenience. The current route is only approximately 100 metres longer than the proposed new routes.	(see above)	
161	24.25			The existing route appears to have been built specifically for access to the car park because it is wider than Church Road, the properties are set back from the road and parking is provided to the rear.	(see above)	
162	24.26			If it is not thought that changing the road layout will increase the volume of traffic then would making these changes be value for money?	(see above)	
163	24.27			Allowing traffic travelling northbound on Roman Way to turn right in to Cranmer Road will mean that there will be more awareness of the potential to turn left on to Church Road from Charles Street. This in itself will result in an increased volume of traffic on Church Road and Cranmer Road.	(see above)	
164	24.28			The Charles Street route that was purpose built for vehicles accessing Q-Park car park will be underused.	(see above)	
165	24.29			Proposal: Prevent vehicles from turning left from Charles Street in to Church Road as this is unsafe	(see above)	

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166	24.30			The proposals would result in cars travelling too fast to be safe along Church Road to reach the car park.	(see above)	
167	24.31			The lack of serious road accidents in the area should be celebrated and the risk of accidents not increased.	(see above)	
168	24.32			Sunday parking restrictions would require review to ensure that residents and visitors of residents can park.	(see above)	
169	30.2			Object to introducing two-way traffic to Church Road between Charles Street and Reeves Corner and prioritising needs of visitors and businesses over local residents.  Even if traffic is calmed, changes would lead to an unacceptable increase in cars and commercial vehicles in a quiet residential area.	(see above)	
170	30.3			Changes would lead to use of parking spaces intended for residents by visitors leading to residents not being able to find spaces.	(see above)	
171	30.4			Object to introducing two-way traffic to Church Road between Charles Street and Reeves Corner. Current access is satisfactory and changes are not required.	(see above)	
172	30.5			The Next Steps chapter should include a full analysis of current and projected parking stress, also current and projected traffic levels and noise pollution, to further assess the detrimental impact for the residents in Old Town.	(see above)	
173	31.1			Objection to changes to Cranmer Road, Charles Street and Church Road because it will increase traffic in the area in particular on	(see above)	

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				Saturdays and Sundays which should be peaceful.		
174	31.2			Objection to changes to Cranmer Road, Charles Street and Church Road because the road width has only recently be reduced to one-lane with attractive public realm put in its place.	(see above)	
175	31.3			Objection to changes to Cranmer Road, Charles Street and Church Road because parking bays might be removed to give room for the traffic.	(see above)	
176	31.4			Objection to changes to Cranmer Road, Charles Street and Church Road because it will increase traffic in the area and decrease house prices.	(see above)	
177	31.5			Improve signage instead.		
178	18.7			One way system:  We are pleased that there are one-way streets in our area, this keeps the area quiet at night and we believe helps to reduce crime such as theft, robbery. However when there are traffic blockages, this is exacerbated due to the one way system, may need a further outlet of traffic onto Roman Way but we do not wish to see the dead end at of Howley Road open to traffic.	(see above)	
179	19A.2			Please consider simple effective signage to direct traffic into or away from central Croydon	(see above)	
180	20.1			Changes will benefit commercial interests, in particularly Q Park and those parking here to the disbenefit of residents.	(see above)	

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			<p>The changes the traffic flows will result in an increase in traffic which the roads will struggle to accommodate. This is the situation now already due to recent development in the area.</p> <p>Summary: Residents parking is also pay and display. The changes would result in increased use of the parking as pay and display resulting in residents finding it more difficult to find a space.</p> <p>Fawcett Road would suffer from an increase in pollution and traffic noise.</p>		
181	44		<p>Why is cycling not proposed in a Western direction on the section of Church Street in between Old Palace Road and Reeves Corner?</p>	C	<p>This is now explained in the Cycle Movement section. The following text has been added to explain this</p> <p><i>Cycling access from the centre of Old Town to the north and west of the area would be improved if cycling could be introduced on the section of Church Street in between Old Palace Road and Reeves Corner. However, this would only be possible if the road could be widened to create a separate cycle lane for cyclist safety. This in itself would require moving the tramstop which is not considered feasible within the next 20 years.</i></p>
182	28.7		<p>2-way on Church Road should be implemented in advance of the redevelopment of Reeves Corner to test the popularity of this measure in advance of making further changes to the road layout.</p>	NC*	<p>The peninsularisation of Church Road is not dependent on the implementing 2-way traffic in Church Road. It will only be worthwhile implementing 2-way traffic in Church Road if 2-way traffic is implemented on Charles Street to improve access to the Q-Park car park.</p>
183	18.2		<p>Cranmer Road right turn access to Roman Way is a bonus.</p>	S*	
184	44		<p>It would not be possible to introduce a new entrance to the Jubilee car park on Cairo New</p>	C*	<p>The following text has been removed:</p>

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				Road because the street is shared with the tram that has priority. Cars queuing to enter the car park could hold up the trams.		<i>Improved access to the Jubilee Bridge (renamed Old Town) car park through an additional entrance from Cairo New Road northbound. The existing entrance to and exit from this car park on Booth Road would be maintained (OT21).</i>
<b>A Series of Components</b>						
185	44			3.5.1 and 2 imply that the whole of the masterplan study area has been broken down in to components which is not the case.	C*	<p>Text amended as follows:</p> <p><i>3.5.1 Site specific guidance is provided for twenty-seven components (sites) within The Old Town Masterplan study area. Components comprise of development, public realm and/or movement opportunities.</i></p> <p><i>3.5.2 It is important to note that the components do not constitute all development opportunities. There will be many other development opportunities within the Old Town area that have not been specifically covered. Any development that comes forward that is not explicitly covered by a component should follow the parameters set out in this document alongside other planning policy and guidance.</i></p> <p><i>3.5.3 The components do not represent site allocations nor should they be considered such.</i></p> <p><i>3.5.4 Each component has been numbered and is prefixed by 'OT' which stands for Old Town.</i></p> <p><i>The components are:</i></p>

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Phasing and Priorities					
186	44		The Meanwhile and Temporary Uses text on page 69 is confusing and somewhat repetitive.	C*	<p>3.6.3-3.6.10 has been replaced with the following:</p> <p><i>MEANWHILE USES</i>  3.6.6 'Meanwhile uses' are temporary uses of sites that are awaiting permanent development. A meanwhile use might be a temporary restaurant or a temporary garden. Meanwhile uses can have a number of benefits for both developers and the local community. For developers they can be a way of testing the viability of potential future permanent uses, improving the visual appearance of sites, animating and changing perceptions of sites and building market momentum. For the community they can provide temporary leisure facilities, opportunities for social enterprises and create training and temporary job opportunities.</p> <p><i>TEMPORARY USES AND EVENTS</i>  5.6.7 Temporary uses and events are encouraged in public spaces to animate the environment and provide diverse leisure opportunities and cultural stimulation in Old Town.</p> <p>5.6.8 Meanwhile uses and Temporary Uses are supported at all times where they are appropriate.</p>
187	44		Given the current demand for housing, housing could be delivered in the "soon" phase rather than the "late" phase on the Ann's Place (West) car park	C*	Redeveloping the site with housing has been included in the "soon" phase.
188	44		It is unlikely that a café and visitor centre will be delivered in the 'Now' phase.	C*	This element of OT20 has been moved to 'Soon'.
189	44		OT 22: Bridge to Wandle Park, is more of a 'Soon' project than a 'Now' project.	C*	The ramp element of OT22 has been moved to 'Soon' but the wheeling channel remains in 'Now'.
190	44		OT17 and OT20 are high priority components	C*	OT17 and OT20 are now in the 'Soon' category.

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			and could be delivered soon.		
191	44		Improvements to the undercroft of the Flyover could be made in the 'Soon' category and should be a high priority to enhance the pedestrian experience.	C*	This element of OT27 has been moved to 'Soon'.
192	44		OT17 could be delivered as a 'Soon' project. In addition, improving the landscaping of the forecourt should be stressed.	C*	The recommended changes have been made.
193	70		3.7.4 Implies that the whole of Frith Road is due to be upgraded but only the southern end of the street is due to be upgraded	C*	OT22 has been moved to Soon.
194	16.3		Phasing: In terms of priority I agree with the list including Roman Way, Church St, Surrey St, which are given the upmost priority in terms of redevelopment the area around the community centre and the Church minster should not be done before the roman way & subway leading to St Johns Road are redeveloped as it wouldn't be feasible in terms of safety and also appearance	NC*	It should be noted that the masterplan does not state that improving Minster Green is dependent on improving Roman Way, although this would help the setting of Minster Green.
195	16.4		I also feel enhancing Waddon Rd & St Johns Rd, Also Abbey Road & Harrison Rise will be much more "cost effective" in connecting the Old Town area to the local Parks of Duppas Hill & Wandle Park instead of finding funding to install the Cycle Bridge [in to Wandle Park] and there those streets should be added.	C*	3.4.3 has been been amended to 3.4.3 has been amended for clarity to the following:  <i>The proposal for pedestrian movement would enhance routes within Old Town and offer improved <b>connections to adjoining destinations to the Old Town Masterplan area</b>, including Wandle Park, North End and South Croydon. The following inter-connected key routes are prioritised should be prioritised for investment:</i>  The following text has been added to Section 3.4

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				<p><i>It is also important to improve pedestrian links to Duppas Hill because this is the closest park to the Southern area of the Old Town Masterplan study area. A priority should be to improve the pedestrian experience at the junction between Old Town (the road that adjoins Roman Way) and the A232 which is currently a network of subways under the road.</i></p> <p>In addition the following graphic change has been made:</p> <p><i>Duppas Hill is now shown on Figures 24 and there is. All the parks are labelled on the drawing and road names have been included.</i></p> <p>The CYCLING MOVEMENT section has also been amended to reflect the need to improve cycling routes to Duppas Hill:</p> <p><i>After 3.4.6 the following bullet point has been inserted: Cycling routes to Duppas Hill park should also be improved. A priority should be to improve the pedestrian experience at the junction between Old Town (the road that adjoins Roman Way) and the A232 which is currently a network of subways under the road.</i></p> <p>In addition, Duppas Hill is now shown on Figure 25 which has been amended in accordance with Figure 24.</p>	
196	44		Given the high demand for housing in Croydon proposals to develop on the Ann's Place (East) car park and Wandle Road Car Park are a more urgent priority and should be moved in to the "Soon" category.	C*	These changes have been actioned. See 3.8, OT 12 and OT27 of the finalised Old Town Masterplan.
197	16.5		Totally agree with the timetable however as always if the projects can be completed earlier than 2020 as the changes are needed now, and by really pushing for funding from Boris and the council etc. and attracting those city	NC*	The timescales are indicative and flexible as is stated in the draft Old Town Masterplan.

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			workers and middle class families like e.g. Balham, Wandsworth, Peckham etc then the redevelopment will get pushed by the government as well.		
<b>Components Introduction</b>					
198	44		Figure 31, p79 is misleading because not all potential development sites within the Old Town area are shown.	C*	This plan has been replaced by a different plan that only shows the outline shapes of the components.
<b>Components OT1 Church Street</b>					
199	7.8		Ideas to improve Church Street from Crown Hill to Reeves Corner needed for long time. Shop fronts and frontages of buildings in poor state, pavements in bad condition. Area needs greening. Crown Hill might do with trees.	C*	<p>The following sentence has been added to the end of the CONTEXT:</p> <p><i>The street has a deficiency of greenery and street trees mainly because street trees cannot be located near the tram lines for safety reasons.</i></p> <p>The following objective has been added:</p> <p><i>6. Increase greenery, in particular street trees where possible.</i></p> <p>The following bullet point has been added to the parameters after the bullet point which starts, "Greenery and tree planting...":</p> <p><i>Trees cannot be planted close to the tramlines for safety reasons.</i></p>
200	3.9		Church Street will benefit from enhancing the	NC*	Window replacement for dwellings of multiple occupation

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			damaged facades, can this include replacing windows that are out-of-character with the styles.		requires planning permission. The Draft Old Town Masterplan is a strategic document and not the appropriate place for specific guidance. Guidance on appropriate window design for Church is provided in the Church Street CAAMP.
201	16		Also and VERY IMPORTANT church St needs to reflect the same investment as George St!!!!	NC*	Guidance on private and public sector investment in different areas of the built environment is not part of the remit of the Old Town Masterplan.
202	16		I agree with changing the Reeves corner Tram stop to Old town it should have been done years ago.	S*	The Old Town Masterplan proposes that the name of the Church Street tram stop is changed to Old Town not the Reeves Corner tram stop. It is assumed that the respondee intended to write Church Street tram stop instead of Reeves Corner tram stop.
203	21A		The Panel do not consider vehicular flows on Church Street to be low	NC*	The vehicular data gathered for the project shows that they are comparatively low compared to other town centre streets.
204	21A		Whilst trees are to be welcomed the Panel are doubtful if there is space in much of Church Street to achieve this.	C*	Additional text has been added to inform the reader of the space constraints on this street largely due to the tram system.  See response to comment XXX.
<b>Components OT2 Surrey Street Market</b>					
205	44		<p>Middle Street and Bell Hill are not mentioned in the Masterplan even though these streets are key historic streets and remnants of the historic street pattern in Old Town.</p> <p>The large service access to the Grants Building on Middle Street has a detrimental impact on Middle Street.</p>	C*	<p>The following text has been added</p> <p><i>CONTEXT (first sentence)</i>  <i>Surrey Street is an attractive historic retail street that slopes downwards from the High Street to Crown Hill. Bell Hill and Middle Street are narrow streets leading off Surrey Street that are attractive, historic retail streets that form a key part of the remnants of the historic street patterns in Old Town. Before Grants was redeveloped in the 1990s Middle Street used to connect to Surrey Street. The large service access to Middle Street has a detrimental visual impact on the street.</i></p>

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					<p>The following bullet points has been added to Surrey Street PARAMETERS:</p> <ul style="list-style-type: none"> <li>• <i>Improve the visual appearance of the boundary treatment for service access to the Grants building on Middle Street.</i></li> <li>• <i>It may be possible in the future to reconnect Middle Street to Surrey Street for pedestrians.</i></li> </ul>
206			Flexibility may be important but customers like to know where their favourite stalls are located.	C*	<p>The text has been amended for clarity:</p> <p>PARAMETERS (2<sup>ND</sup> bullet point)</p> <ul style="list-style-type: none"> <li>• <i>It is important for the layout of the market to balance the requirements for pedestrian movement between stalls and for access to shops on Surrey Street.</i></li> <li>• <i>The location of stalls should not altered significantly on a regular basis so that shoppers can easily find stalls they have visited previously.</i></li> </ul>
207	3.7		♦ The block of flats in Surrey Street has concrete pillars and walkway that is cold and unfriendly, can these be painted or enhanced in some way.	NC*	<p>The Old Town masterplan is a strategic document and cannot provide specific guidance on every individual site, such as this one.</p> <p>However, improving the built environment of Surrey Street – as is recommended in the Old Town Masterplan - is more likely to attract businesses to lease the shop units located behind this colonnade. Such businesses would be likely to invest in their shop frontages to attract customers which would improve the overall visual appearance of the colonnade.</p>
208	4.10		Component 'OT3' seeks to unify Frith Road, Church Street and Keeley Road and provide for improved connections to the surrounding areas, including Centrale Shopping Centre. The Council suggests that methods of achieving this aspiration include using planting	NC*	<p>The Council is committed to improving connections and the public realm in the Old Town Masterplan study area as well as the successful redevelopment of the retail core. It is not considered that they are mutually exclusive.</p>

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			to increase activity and interest along the blank wall of the Centrale Centre and for the pedestrian link to be reopened and signposted through Centrale during retail opening hours. Whilst CLP supports the Council's aspirations for OT3, it should be noted that any development proposals that come forward should be assessed against their own individual merits against Development Plan policy and should not prevent the overall successful comprehensive redevelopment of the Retail Core, including the Centrale Centre.		
<b>Components OT4 Exchange Square</b>					
209	5.6		OT4 It may be advantageous to extend the vision for the square in respect of encouraging more specialist and cultural arts based uses which will support the existing café and range of uses set out in OT5 and strategy for temporary uses. Any new play facilities should also respect the setting of the listed Pumping Station and be sited so that they complement the space without adding to a cluttered public realm.	C*	Add text to the following bullet point: <ul style="list-style-type: none"> <li>Public realm design should include incidental integrated play opportunities <i>that respect the setting of the listed Surrey Street Pumping Station and do not clutter the public realm. (P98)</i></li> <li><i>Specialist and cultural arts based uses are encouraged for the buildings surrounding the square to enhance the visual appearance of Exchange Square and range of activities in Old Town.</i></li> </ul>
210	3.11		Could the shops in Exchange Square be rented out for free for a period to bring to life this underused area.	NC*	The Old Town Masterplan is guidance for the built environment and cannot provide guidance on the management of private property.

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Components OT5 Surrey Street Pumping Station				
211	3.6		Can the black metal windows and doors on the Pumping Station be painted/covered to emulate proper windows/doors as a temporary measure as there is no current date for this to be brought back to use, and they give the building a derelict feeling.	NC*  This suggestion is too specific to include in the Old Town Masterplan which is a strategic document.  We will forward the suggestion to the team working on trying to bring the building in to public use.
212	5.5		3.7.6 It may be advantageous to state at this point that the new use should also provide a complimentary and sustainable use for the building.	C*  The 2 <sup>nd</sup> Objective has been altered to the following: Identify a new use, or a range of uses, for the building which are sustainable and complimentary to its architectural merit.
213	5.7		OT5 We would suggest revising the first parameter for reuse of the Surrey Street Pumping Station to state that it is imperative for the area that the Surrey Street Pumping Station provides an accessible use, or range of uses which provide a desirable destination and actively contribute to the regeneration and amenity of Exchange Square.	C*  The text of the first parameter has been changed to state the following: <ul style="list-style-type: none"> <li><i>It is imperative for the regeneration of the area that the Surrey Street Pumping Station provides a publicly accessible use, or range of uses, which provide a desirable destination and actively contribute to the amenity of Exchange Square.</i></li> </ul>
214	5.8		Rather than stating changes should be flexible we would suggest stating that any alterations must be considered to sustain or enhance the significance of the Pumping Station whilst securing a sustainable and appropriate future for the building.	C*  The text of the third bullet point has been changed to state the following:  <i>Any changes to the building should be considered to sustain or enhance the significance of the Pumping Station whilst securing a sustainable and appropriate future for the building.</i>
Components OT6 Ryland House				
215	3.8		Ryland House is completely out of scale and	C*  The CONTEXT section has been amended as follows to

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			has a very negative effect on the street scene. It is cold, bleak, drab, and not at all sympathetic to the surroundings. Original view down Rectory Grove from Wandle Park to the Minster is completely diminished by this building, the Victorian terrace houses are dwarfed and diminished by it – can it be demolished? Or reduced in scale?		<p>emphasise the detrimental impact of Ryland House:</p> <p><i>Ryland House is a 13 storey tall and wide office tower built in the early 1970s as the General Post Office switching centre in a modernist style. It was built before the designation of its neighbouring conservation areas in Old Town and its large scale means it has a detrimental visual impact on Old Town and dominates views. This impact is compounded by its inactive frontage, noisy vents, wide vehicular access point with a poor quality boundary treatment and surrounding public poor quality public realm which includes cracked paving. The public realm does include a few attractive trees which go a little way to ameliorating the detrimental impact of the building. The building is currently used by British Telecom.</i></p> <p>Add the following objective:</p> <ol style="list-style-type: none"> <li><i>If the site is redeveloped then Ryland House should be replaced with a building of a significantly smaller scale that would be more respectful of the scale and special character of the surrounding conservation areas and Old Town.</i></li> </ol>
216	36A.6		Plant and landscape the base of Ryland House to minimise the brutal nature of the building or demolish it!	C*	<p>See response to comment XXX.</p> <p>The following text has been added to Objective 1: <i>Improve the immediate setting to the building with an attractive public realm including soft landscaping.</i></p>
<p><b>Components</b> <b>OT10 Reeves Corner</b></p>					
217	28.1		Congestion at the Reeves Corner Junction is created by Centrale Car Park being slow to absorb traffic or school drop off and collection times at Old Palace School, which creates	C*	<p>The following text has been added to the 2<sup>nd</sup> paragraph of the CONTEXT:</p> <p>Reeves Corner is one of the few gateways in to Old Town and</p>

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			queues along Church Road.		a key junction where eight roads join. <i>Traffic congestion occurs on Reeves Corner during busy shopping times when many vehicles are queuing up to access the Centrale Car Park on Tamworth Road. Traffic also backs up on the nearby Church Road when Old Palace School children are being dropped off and collected.</i>
218	3.10		Chapter 5 ♦ Please can the temporary concrete tree tubs at Reeves Corner be painted?	NC*	This level of detail is not appropriate for the Old Town Masterplan. However, it should be noted that this painting has recently occurred.
219	28.5		The visibility of the House of Reeves shop from Drummond Road seems to be less in the indicative masterplan (and also on the 3D model shown at consultation) than shown in the component. The existing store makes a positive contribution towards the pedestrian route to The Minster and should be as prominent as possible.	NC*	This is not the case.
220	28.6		Loading bay provision should not be reduced from current scale – to accommodate 40ft container vehicles) so as to not jeopardise the viability of the historic House of Reeves store.	C*	The following parameter has been added to provide clarification: : <i>Adequate loading bay provision for the use of the site should be provided.</i>
<b>Components</b> <b>OT11 Ann's Place Car Park</b>					
221	44		The Ann's Place Car Park component does not include part of Ann's Place Car Park which is confusing.	C*	The site of Ann's Place car park (West) has been moved from the Drummond Road Component (OT12) in to OT11.  The following introductory statement has been added to the CONTEXT:  <i>This component comprises of two car parks which share the</i>

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					<i>name – Ann’s Place car park. To distinguish between the two sites, the car parks are referred to as Ann’s Place Car Park (West) and Ann’s Place Car Park (East).</i>
<b>Components OT12 Drummond Road</b>					
222	4.11		Component ‘OT12’ is the proposed link between North End and Old Town along Drummond Road which incorporates the underpass beneath Centrale Shopping Centre. The Council’s aspirations for this area include enhancing the connection through the Centrale Centre from North End for pedestrians and cyclists, as well as increasing tree planting and “greenery” along Drummond Road. CLP welcomes these objectives and considers enhancements to the connectivity and public realm of this link road to be sensible given the Council’s overarching aspirations for CMC. The draft Masterplan also states that the Council will seek to promote active frontage along Drummond Road wherever possible. Again, CLP supports this aspiration, but suggests that any development proposal which comes forward be assessed against relevant policies in the Development Plan and should not prejudice the overall successful comprehensive redevelopment of the CMC.	NC*	<p>The Croydon OAPF encourages the comprehensive redevelopment of parts of the CMC and the sensitive development of the Old Town area due to the many heritage assets located in the area.</p> <p>The Council does not consider the success of both Old Town and the wider CMC area to be mutually exclusive. The Old Town Masterplan sets the strategic framework for the future development of Old Town. It states a desire for the retail in Old Town to complement that of the retail core. Through the assessment of individual planning applications for future development potential specific impacts will be analysed and relevant policy and guidance will be weighed up and applied to the determination of the applications.</p>
<b>Components OT15 Former Mission Chapel</b>					
223	2		<i>Section 3.8.10 OT15 Former Mission Chapel</i> The preservation of this structure is presented	NC*	This phasing section summarises how the Council considers Old Town should be regenerated and the description of OT15

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		<p>here as the only possible option. Later however, on page 105, the Draft Masterplan acknowledges that replacement of the structure may be considered. This is entirely appropriate. The Masterplan must, in accordance with the approach required by the NPPF and the recently published Planning Practice Guidance, enable flexibility for a balanced judgement on proposals affecting buildings such as this. Refer, for example to Paragraph 18 of the Planning Practice Guidance, which states that <i>"If the building is important or integral to the character or appearance of the conservation area then its demolition is more likely to amount to substantial harm to the conservation area, engaging the tests in paragraph 133 of the National Planning Policy Framework. However, the justification for its demolition will still be proportionate to the relative significance of the building and its contribution to the significance of the conservation area as a whole"</i></p> <p>This balanced approach should take account of the building's contribution to the significance of the Church Street Conservation Area as a whole, and the public benefits of any proposal affecting it. To present preservation as the only appropriate option is to pre-judge any future proposal, and is in contravention of the approach required by the NPPF and Planning Practice Guidance.</p> <p>This section of the Masterplan, in order to ensure consistency with the NPPF and Planning Practice Guidance, should be</p>	<p>is accurate and in accordance with the Draft Church Street Conservation Area Appraisal and Management Plan SPD.</p> <p>As is outlined in National Planning Policy and Guidance and, as is the case for any building that makes a positive contribution towards a conservation area, an applicant can submit a planning application for demolition and redevelopment of the Former Mission Chapel. To be granted consent the application has to demonstrate that the public benefit of their scheme will outweigh the harm to the conservation area. It is not necessary to repeat this policy and guidance in the Old Town Masterplan SPD.</p>
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			<p>amended to take account of the possibility of replacement. It should state that any proposal affecting the structure should be subject to a comprehensive heritage appraisal to enable an informed decision to be made with regard to the significance of the building and its contribution to the significance of the conservation area as a whole:</p> <p><i>“This is a building of some heritage interest. Proposals affecting it must <del>The attractive former chapel is preserved and has an improved forecourt facing the street building be</del> subject to a comprehensive heritage appraisal to enable an informed decision to be reached, proportionate to the significance of the building and its contribution to the significance of the conservation area as a whole”.</i></p>		
224	2		<p><i>OT 15 Former Mission Chapel</i></p> <p>This section begins by asserting that <i>“The former mission chapel is a valued historic building”</i>. This building, at No. 47 Tamworth Road, has formed part of a comprehensive heritage appraisal carried out on behalf of our client by KM Heritage, which shows that its heritage significance should not be overstated.</p> <p>The building is neither statutorily nor locally listed, and it is only in recent times that it has been encompassed into any heritage designation, through inclusion in the Church Street Conservation Area in 2008. Prior to Conservation Area designation in 2008 the Church Street area was designated at a local</p>	NC + C*	<p>Croydon Council disagrees with this assessment of the building. The Draft Church Street Conservation Area Appraisal and Management Plan describes the building as making a positive contribution to the conservation area because it is of both architectural and historic significance.</p> <p>Furthermore, the assessment of the Church Street area provided evidence to recommend to Full Council 6 October 2014 that the Former Mission Chapel was locally listed. This recommendation was granted and the Former Mission Chapel is now locally listed.</p> <p>The length of time that a building has been part of a conservation area is not relevant to a planning application for the site; nor is superseded planning guidance.</p>

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		<p>level, in 1992, as the Church Street Local Area of Special Character (LASC). These areas were described, in paragraph 5.19 of the UDP, as <i>“older areas of the Borough that, although unlikely to meet the criteria for designation as Conservation Areas, possess sufficient architectural, townscape and environmental quality to make them of significant local value”</i>. No. 47 Tamworth Road did not form part of the Church Street LASC. It was not considered to contribute to the ‘architectural, townscape and environmental quality’ of the local area when the LASC was designated in 1992.</p> <p>In extending the boundary of the Church Street LASC to include no. 47 within the Church Street Conservation Area in 2008, the following rationale was provided: <i>“There are a number of Locally Listed buildings on the adjacent section of Tamworth Road, and Frith Road is a row of Victorian terraced cottages which form a distinct barrier against large recent developments, hence the decision to include these streets”</i><sup>6</sup>. This suggests that the decision to extend the old LASC boundary to incorporate parts of Tamworth Road was based on the presence of locally listed buildings. No. 47 however, was not and is not locally listed.</p> <p>UDP Policy UC1, ‘Designation of Conservation Areas’, which applied in 2008, stated that <i>“Where appropriate the Council will designate</i></p>	<p>A more detailed description of the building is provided in the Church Street CAAMP and this information will now be signposted in section 4.1 INTRODUCTION TO THE COMPONENTS.</p> <p><i>4.1.4 More detailed descriptions of buildings that make a positive contribution towards the conservation areas in Old Town are provided in the Conservation Area Appraisals and Management Plans for the Central Croydon, Church Street, Croydon Minster conservation areas that lie within Old Town (See Section 2.10 Policy Context).</i></p> <p>The assessment work undertaken as part of the Church Street CAAMP constitutes a comprehensive heritage appraisal, sufficient to determine that the building makes a positive contribution towards the conservation area.</p>
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<sup>6</sup> Report to Planning Policy Development Sub-Committee, 10 December 2008

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		<p><i>new Conservation Areas.....where it is considered such areas are of special architectural or historic interest". There does not appear to have been any justification provided by the Council as to the 'special architectural or historic interest' of no. 47 when the decision was made to include it within the Church Street Conservation Area boundary in 2008.</i></p> <p>In architectural terms, the building is essentially a very simple pitched roof, rectangular structure with a slightly more elaborate, if modest, street elevation. It is the poor relation of other buildings in the locality and is not a great example of its type. Historically, it was surrounded by development on its south and west sides. This original context has been lost due to post-war development of the local area. By the 1960s, site clearance at Cairo New Road and a new road layout had dramatically changed the character of the area, including the junction of Tamworth Road and Church Street. Reeves Corner had been created and this necessitated the demolition of many 19th century buildings at the end of Tamworth Road. This has resulted in a disjointed feel, with buildings on the western side of Tamworth Road, including no. 47, feeling cut off from the core of the Church Street area.</p> <p>Despite its limited architectural interest, its lack of original context and its isolation from the core of the Conservation Area, the Draft</p>		
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		<p>Masterplan states that this building “<i>makes a positive contribution to the Church Street Conservation Area</i>”. Based on an assessment carried out by KM Heritage however, it is clear that this building’s contribution to the significance of the Church Street Conservation Area should not be overstated. The assessment carried out by KM Heritage has concluded that no. 47 is “<i>of reduced significance and diminished architectural and historic interest</i>”, not a good example of its type, and “<i>not particularly representative of the character and appearance of the conservation area</i>”.</p> <p>The building’s limited significance and contribution to the Conservation Area should be reflected in an amended wording for this section, and the validity of its replacement as a potential element of future development proposals should be more explicitly stated. It is inappropriate, in the context of the NPPF and Planning Practice Guidance, for the Draft Masterplan to pre-judge proposals which may incorporate this building by advancing retention and restoration as the only acceptable ‘parameters’.</p> <p>We propose the following amendments to the wording of this section: Context: <del>The former mission chapel</del> <i>No. 47 Tamworth Road, which lies inside the Church Street Conservation Area, is a valued building but is currently in poor condition but makes a positive</i></p>		
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			<p><del>contribution to the Church Street Conservation Area. The building was first used as a Salvation Army Chapel. This was the first Salvation Army Chapel outside of the East End. It is now being used as a gym, although a number of other businesses have attempted to trade from it over the years. Its original context on Tamworth Road has been lost due to post-war development of the local area, and it is now set back from the street with a poorly maintained yard which is often used for car parking. Its signage is of poor quality and it is currently being used by a boxing gym.</del></p> <p><b>Objectives</b></p> <ol style="list-style-type: none"> <li><del>1. Preserve the historic former Mission Chapel and improve its condition and setting and relationship with the street.</del>  <i>Ensure that any proposals for this building include a comprehensive heritage appraisal to enable an informed decision to be reached, proportionate to the significance of the building and its contribution to the significance of the conservation area as a whole.</i></li> </ol> <p><b>2. Description</b></p> <p><i>This building occupies a high profile position within Old Town. A carefully balanced judgement must be reached on any development proposal incorporating it, which takes account of its heritage interest. Options may include restoring the condition of the building and its forecourt to improve its</i></p>		
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		<p><i>relationship with the street through soft landscaping. With some careful alterations this building could provide more activity and vibrancy to the area which would also increase overlooking and improve the perception of safety. A more comprehensive redevelopment proposal incorporating this site could also bring such benefits, and replacement of the building may also be considered as an option.</i></p> <p>Parameters  <del>The former mission chapel should be retained</del>  <i>Any development proposal incorporating this building should include a comprehensive heritage appraisal to facilitate a balanced judgement to be made on its future.</i>  <i>If retention is considered the most appropriate option for the building, restoration works should include redefinition of the damaged doorway and right window and the removal of vegetation to the parapet and the shutter.</i>  <del>Alterations</del> <i>Proposals</i> could explore ways to increase the level of activity to the frontage while retaining the building's historic character, for example through restoration and refurbishment of front windows.</p> <p><del>Landscaping to the front of the building should be improved, through reduction of some of the car parking, planting and boundary definition.</del>  <i>The building occupies a high profile position at the foot of Tamworth Road. It is important that landscaping/public realm are improved as part of any proposal incorporating this site.</i></p>		
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			<i>It must be demonstrated that the building is beyond economic repair and all re-use options have been examined before replacement can be considered.</i>		
225	11.1		<p>I don't consider that preservation is always the best solution. I don't consider this building is worth saving. The owners of the gym have ruined the building internally already. The site has more potential and value to serve the area than to remain a dilapidated, ugly and valueless structure. Can someone please point out to me what part of what's left of it is worth preserving?</p> <p>I do not think this is a "valued historic building". There are some attractive historic buildings on Tamworth Road, but this is not one of them. It should be replaced as part of a new development of this area.</p>	NC*	The poor condition of the building does not reduce its architectural and historical significance. The external appearance of the building makes a positive contribution towards the Church Street conservation area and should be preserved.
226	13.3		<p>OT15 Former Mission Chapel: This dreadful building has insufficient architectural or historical merit to be retained. It is liable to remain an eyesore for years to come, especially outside of the public realm. There is no incentive for the landowner to improve it.</p> <p>I would argue that this untidy building with cars at the front will be out of place in a revitalised area. There is real potential for new development to the immediate area without it. This is part of the problem with the area not a solution to the problem.</p>	NC*	See response to comment XXXX above.

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227	14.2		I cannot see the merit in attempting to preserve this unattractive and dilapidated building. Surely the objective should be to retain the best historic and heritage building and not just all or any older buildings irrespective of other considerations.	NC*	See response to comment 188 XXXX above.
<b>Components OT16 Cairo New Road</b>					
228	2		<i>Section 3.8.11 OT16 Cairo New Road</i> Cairo New Road is the largest opportunity site for new housing in the masterplan area. It is a requirement of The London Plan that housing output on sites such as this is optimised. The opportunity to deliver a large amount of new homes on this site should therefore be highlighted by the Masterplan: <i>"The site presents a significant opportunity to deliver a large amount of new homes within Old Town"</i>	NC*	The description of this site in the Draft Masterplan is accurate and no change is required. As is stated in 4.1.2, The Draft Old Town Masterplan does not cover all potential opportunity sites and therefore it would be incorrect to state that this is the largest opportunity site.  With regard to the request that text is included to state that housing output is optimised see comment XXX above.
229	44		<b>OT16 Cairo New Road</b>  <b>Context and Parameters</b> The text does not make it clear enough that this site is comprised of two plots and that development of each plot could come about separately.	C*	The Context section has been amended as follows:  <i>The site is comprised of two plots. Each plot includes a simple warehouse building which has offices attached. These buildings were built as premises for small businesses and are currently occupied by two churches – The New Life Christian Centre and the Mountain Of Fire and Miracles Ministries Church who occupy Arcadia House. (In the case of Arcadia House, the church use has temporary planning consent).</i>

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					The following parameter has been included: <i>Each plot could be developed individually. If this occurs, then the design of each individual plot should not unduly compromise the future redevelopment of the adjoining plot.</i>
230	2		<b>CONTEXT and PARAMETERS</b> As noted previously, the church use within Arcadia House has only been permitted on a temporary basis. It should be clarified that the requirement to reprovide community uses does not apply to temporary uses. The development of a key Opportunity Site such as this should not be compromised by a requirement to rehouse a temporary use.	C*	See response to comment XXXX above for changes to Context.  <i>The 6th bullet point has been amended on page 107 to:</i> <ul style="list-style-type: none"> <li><i>Existing community uses (floorspace) <b>that have permanent planning permission must be incorporated in to future redevelopment of the site</b> or reprovided elsewhere.</i></li> </ul>
231	2		<b>Objectives</b> This is the largest Opportunity Site for new housing in the Old Town and can deliver a significant amount of the new homes required for the area. This should be accurately reflected in the Objectives section.	NC*	See response to comments 49 and 192 XXXX.
232	2		<b>OBJECTIVES</b> In addition, this section currently differentiates between 'family homes' and 'apartments'. It should be noted however, that apartments, when designed to the appropriate standards, can be entirely suitable as family homes. The text should therefore be amended as follows: <i>This is the largest Opportunity Site for new housing in the Old Town, and can deliver a large amount of new homes. Deliver new family homes and apartments within Old Town.</i>	NC + C*	The text has been amended for accuracy:  1. <i>Deliver new family homes and smaller homes.</i>
233	2		<b>Description</b>	NC*	See responses to comments 49, 53 and 192 XXX.

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		<p>Again, in describing the site, it should be recognised that it is the largest Opportunity Site for new housing in the Old Town area. The description should also more clearly acknowledge the high-profile, gateway nature of the site:</p> <p><i>This is the largest Opportunity Site for new housing in the Old Town. There is an opportunity to deliver meet some of a significant amount of Croydon's housing needs in Old Town on this site with a high quality development providing both family homes and smaller apartments set within a high quality public realm with soft landscaping and play facilities. This is a large, high-profile gateway site on the edge of the Old Town area and is prominent from the flyover.</i></p>		<p>Cairo New Road is not a high-profile gateway site because it is not located at a key junction in to Old Town. It is considerably set back from Reeves Corner which is a key gateway in to Old Town.</p>
234	2	<p><b>Parameters</b></p> <p>The 'Parameters' section should not include a density range for this site. The density of any development proposal on the site will be the product of site-specific characteristics and building design. The achievement of an appropriate design on this key site should not be constrained by an expectation to comply with a specified density range. The OAPF recognises this in noting that "New schemes proposed alongside existing infrastructure will need to adopt a design approach that is context and site led. Given the broad spread of locations and possible site specific circumstances, it is more difficult to provide general design guidance" (OAPF, paragraph</p>	NC*	<p>The density range supplied is consistent with the OAPF. It is stated that it is supplied as "a guide" to allow for some flexibility when proposals are presented. The Old Town Masterplan provides an additional and more detailed layer of site specific guidance to the OAPF.</p>

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			6.60).		
235	2		It is also inappropriate to specify an upper height level as part of this section. As the OAPF states, adopting a 'blanket approach' to building heights in this area is not appropriate as <i>“there are numerous physical and site specific differences that will require careful consideration on a case-by-case basis to determine an appropriate height at the planning application stage”</i> (OAPF, paragraph 6.37). Instead of referring to maximum height levels therefore, the masterplan should enable flexibility by simply stating that <i>“the site could have one, or a maximum of two tall elements”</i> and that those elements <i>“must be carefully designed so that they avoid harm to the significance of the setting of the Minster”</i>	NC*	The Old Town Masterplan provides more detailed and site specific guidance for Old Town than is provided in the OAPF to provide clarity for developers. It has an appropriate degree of flexibility.
236	2		The 'Parameters' section should not advance a specified percentage for family housing. As acknowledged elsewhere in the text, <i>“The precise level of family housing will be determined through the planning process”</i> . Furthermore, it is not considered appropriate to specify that family housing should be <i>“a size of three bedrooms or more”</i> . With census figures confirming steadily falling family sizes, 3 bedroom units no longer represent the minimum unit size required for modern families.	NC*	The Draft Old Town Masterplan is consistent with the OPAF and the Croydon Local Plan in relation to both elements of the text that are objected to within this comment.
237	2		The following amendments should be made to the text of the 'Parameters' section:  ● <del>The Croydon Metropolitan Centre</del>	NC*	The Old Town Masterplan provides more detailed and site specific guidance for Old Town than is provided in the OAPF to provide clarity for developers. It has an appropriate degree of flexibility.

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			<p><del>Opportunity Area Planning Framework identifies appropriate housing density at infrastructure edge sites of 110–170 dwellings per hectare, and historic infill sites of 65–100 dwellings per hectare. As a guide, new development at Cairo New Road should be between these two subject to assessment of impact of any proposed development</del></p> <ul style="list-style-type: none"> <li><del>A significant proportion of the housing should be for families. The OAPF identifies a housing mix which includes 45% family housing (a size of three bedrooms or more). The precise level of family housing will be determined through the planning process.</del></li> <li><del>The development must preserve or enhance the setting of nearby heritage assets – the setting of the Church Street Conservation Area and listed buildings. The site could have one, <del>or a maximum of two</del> <b>or more</b> tall elements, <b>as will be determined by the planning authority when considering any future application for the site.</b> <del>These buildings could be up to 10 storeys to avoid the building having an imposing impact on the Church Street Conservation Area. Any tall elements must be carefully designed so that they avoid harm to the significance of the setting of the Minster.</del></del></li> </ul>		
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238	2		<del>Existing community uses (floorspace) The existing level of permanent community use (floorspace) at the 'New Life Christian Centre' must be incorporated or reprovided elsewhere.</del>	C*	The text has been amended as recommended:  <del>Existing community uses (floorspace) The existing level of permanent community use (floorspace) at the 'New Life Christian Centre' should be incorporated or reprovided elsewhere.</del>
239	10.1		3.1.3 We agree that this site can provide new homes and associated community spaces and in assisting to deliver the homes proposed in the Croydon Local Plan.	S*	
240	10.2		3.3.22 The site is identified in figure 22 of the draft plan as a primary frontage to new infill and flyover edge development sites. We agree that the site has capacity to provide residential development and the ground floor of such development can be utilised for a mix primarily of community use, with a potential small area for retail use.	S*	
241	10.3		We agree that OT16 Cairo New Road presents a significant opportunity to deliver new homes within Old Town while re-providing space for the existing permanent church use, and that this is likely to be deliverable as "soon".	S*	
242	10.4		OT16 Agree that this site can deliver the objectives specifically set out in the draft plan, being: <ul style="list-style-type: none"> <li>2. Deliver new family homes and apartments within Old Town</li> <li>3. Re-provide a church space for the existing permanent church</li> <li>4. Create a high quality public realm that contributes to Cairo New Road and the</li> </ul>	S*	

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			setting of the new development.		
243	10.5		Request that Croydon Council considers the inclusion of a small amount of retail as part of a mix of uses at ground floor level for Cairo New Road.	C*	In the Old Town Masterplan it is not possible to specify that any retail or another change of use would be permitted on the site because the Old Town Masterplan is a strategic document and as an SPD it does not have the power to undertake site allocations. The following parameter has been added for the Cairo New Road component before the public realm parameters to provide more clarification: <ul style="list-style-type: none"> <li><i>Proposals for a change of use town would be considered as part of a pre-application in accordance with the Development Plan and alongside other material considerations.</i></li> </ul>
244	10.6		The comments at p54 and p59 above apply.  Also we cannot see any through route on Figure 54	C*	See responses above under Development Parameters.  An indicative through route has been added to Figure 54.
<b>Components OT18 Minster Green</b>					
245	10.7		<i>“ ...Roman Way have a negative impact as does a long concrete wall which divides the space etc.”</i>	C*	Text within the 2 <sup>nd</sup> paragraph of the Context has been changed as follows:  Roman Way and the car park and subway located at the front of the Minster all have a detrimental impact on the visual amenity of Minster Green as they create a harsh neighbouring environment to the public space. In addition the design of Roman Way encourages fast driving which has a detrimental acoustic impact.
246	36.4		Remove raised bed near to the Minster.	C*	The raised bed exists because there is a change in ground level on this site between Church Road and Church Street and

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					<p>the Minster graveyard. It includes some valuable greenery.</p> <p>The following parameter has been added to OT18 to reflect the need to manage the change in level:</p> <p><i>Consider how the changes in level within the site could be reduced to increase step-free access around The Minster and ease of pedestrian movement.</i></p>
247	38.0		<p>Specific concern about the raised and sloping flowerbed on the north side of the Minster. A quick win for the area could be for the Council to remove the trees and bushes from this flowerbed which currently cut out light inside the Minster and obscure the north side when approaching from Minster Green. A flower bed levelled off with some flower planting would be beautiful.</p>	C*	<p>The greenery around the Minster is in poor condition, however, its loss would be detrimental to the visual amenity of the area and increase the deficit of greenery in Old Town. The retention and maintenance of existing greenery is preferred and a parameter has been added as follows to make this point more clearly:</p> <ul style="list-style-type: none"> <li><i>Prune and manage existing soft landscaping to enable it to make a positive contribution towards the visual amenity of the area and not unduly reduce natural light entering the Minster.</i></li> </ul>
248	43.2		<p>The proposed area around the Croydon Minster is very positive.</p>	S*	
249	37.0		<p>I am concerned about number of parking spaces available for the Minster – we need a minimum of 40.</p>	NC*	<p>The masterplan does not have the remit to propose specific provision of car parking for individual organisations.</p>
250	7.3		<p>OT18 Minster Green - Comments in 'Context' correct. Agree area needs big facelift – poor pavements, odd bushes, flower beds, etc. – lack of cohesion. Passage from Church Road unsafe especially at night. Car parking is haphazard and needs rationalising and controlling.</p>	S*	
251	7.3		<p>Bushes / hedge around passage should be removed so as no 'blind' corners.</p>	C*	<p>Balancing providing interesting soft landscaping and biodiversity with maintaining good visibility and site lines is</p>

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					<p>always a challenging balance to strike when designing the public realm. A new parameter has been added to reflect this point:</p> <p><i>When designing the public realm carefully consider the need to provide interesting soft landscaping to improve visual amenity and biodiversity whilst at the same time maintaining good visibility and site lines to achieve natural surveillance.</i></p>
252	44		The context does not describe the existing car park to the rear of the Church Hall.	C*	<p>The following has been added to the end of the first paragraph of the Context section:</p> <p><i>There is an under-used car park to the rear of the Church Hall.</i></p>
253	44		Context: Minster Green is not often surrounded by cars.	C*	This text has been removed from the first paragraph of the Context section.
254	44		Parameters should include protecting existing trees to the north of the Minster. These include yew trees which have an historic sacred association with churches and are part of the area's heritage.	C*	<p>The following parameter has been added:</p> <p><i>The existing trees that make a positive contribution towards the public realm should be retained and enhanced particularly as there is a shortage of greenery in Old Town.</i></p>
<p><b>Components</b> <b>OT19 Church Hall Site</b></p>					
255	7.4		Church Hall is time-expired and not practical anymore, It is unattractive and facilities poor. New building should be a centre for, and useable by, the community. Main hall rather large for today's needs, a stage questionable as a moveable one would use space better, and ceiling lower. Other smaller rooms for meetings, etc. should be provided and adequate storage space for users' equipment.	C*	<p>It is not appropriate in a Supplementary Planning Document to go in to detail about specific facilities that will be provided such as storage and a kitchen.</p> <p>In line with this approach, the parameter that stated that a stage is provided has been removed.</p>

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			Good kitchen needed, maybe with counters/shutters opening in to more than one meeting area to enable different activities to go on, even simultaneously.		
256	5.9		OT19 The context sets out the positive aspects of the existing Church Hall. As the proposals allow for potential replacement it would be helpful to identify the negative aspects which any replacement building should resolve.	C*	<p>The context text has been changed as follows:</p> <p><i>CONTEXT</i>  <i>The existing Church Hall is of simple design and constructed from good quality materials. However, its location and surrounding landscape have a detrimental impact on it. The hardscaped forecourt and the grassed area to the north of the hall lack design interest. They are in a poor condition and underused. The significant set-back of the building from the street prevents it positively addressing Church Street and Church Road.</i></p> <p>New parameters:</p> <ul style="list-style-type: none"> <li>• <i>Replacement development on the site should positively address Church Street, Minster Green and Church Road with active frontages and high quality soft and hard landscaping.</i></li> <li>• <i>The set-back of the building could be reduced to minimise underused surrounding soft landscaping, subject to the applicant demonstrating that the replacement development would not have an imposing impact on neighbouring properties.</i></li> </ul>
257	5.9		We would also recommend that the wording in respect of any new development should be expanded to state <i>sustain and enhance the significance of the Minster and its setting</i> rather	C*	<p>The 4<sup>th</sup> parameter has been amended to the following:</p> <p><i>New development should sustain and enhance the significance of the Minster and its setting. It should also respect the setting</i></p>

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			than just its setting.		<i>of the other neighbouring listed buildings on Church Street.</i>
258	44		The parameter text should be consistent with the drawing and state that it would be acceptable to develop on the land currently occupied by a car park for the Church Hall.	C*	The following parameter has been added:  <i>It is acceptable to develop on the land currently occupied by the car park.</i>
259	7.5		OT20 St John's Memorial Garden – Make more suitable for general leisure use. Open up the garden to let more light in by trimming trees. Prevent inappropriate activities by making area more visible.	C*	Add the following parameter:  <i>Trees should be pruned to allow more light in to the garden and to improve sight lines.</i>
260	21A		Would not a part-time park keeper be helpful for security?	NA*	It is not appropriate for a Supplementary Planning Document to provide guidance on Management.
261	18.6		We would like the council to replace the wooden door to the SJMG and this time treat the wood and maintain it. Research has proved that residents have greater pride in an area that is maintained!!.	NC*	It is not within the remit of a the masterplan as a Supplementary Planning Document to provide guidance on management and management. However, we will forward on your concerns to The Council Property Team who are responsible for maintenance of the this Scheduled Ancient Monument. We are also in dialogue with English Heritage regarding this issue. If you require a future update please contact the Council's conservation officer.
262	24.36		Suggest play facilities provided at St John's Memorial Garden which already has attractive greenery and a wall to prevent children running in to the road.	NC*	This suggestion is already included in the Parameters for OT20 St John's Memorial Garden.
<b>Components OT21 Roman Way</b>					
263	2		The objective to improved pedestrian access to Wandle Park and the north of the railway line using Roman Way is very welcome and should be an immediate priority. Also, the parameter	S*	

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			requiring an increase in “tree planting and other greening along the road” is very welcome and should be prioritised for early delivery.		
264	16.8		Fix Roman way I REPEAT FIX ROMAN WAY reduce the speed put it under ground whatever it takes! Remove the subways they are not needed and are a hazard and an eye sore.	S*	
265	39.2		I approve of trees along Old Town / Roman Way. But I think it is important that trees here and elsewhere in the area should not block or detract from views of the Minster. If possible more views should be opened up to allow the Minster to unify the area.	C*	The following parameter has been added after the 5 <sup>th</sup> bullet point:  <i>Tree planting should unduly not disrupt views of Croydon Minster from St Johns Road and Rectory Grove.</i>
266	42.2		Roman Way needs to be addressed.	S*	
267	42.2A		There should be more after working hours activities e/g/ cafes, bars, exhibition / art gallery	S*	The masterplan recommends the activation of the public realm with cafes and a cultural use for the pumping station.
<b>Components OT22 Bridge in to Wandle Park</b>					
268	7.6		OT22 Roman Way and Waddon New Road, plus the footbridge isolate the park from Old Town. Certainly a sloped bridge would help if there is room for ramps. A café in Wandle Park with toilets would attract people more, like the successful set up at Lloyd Park, even if only open a few hours each day.	NC*	Wandle Park is not part of the masterplan; however a café is opening this summer in the park that has toilets.
<b>Components OT23 St John’s Road and Rectory Grove</b>					
269	16		It is good to see you have seen reason and included the streets originally connected to Old Town but sliced in half by the Roman Way, as This side of Old Town needs to be	S*	

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			redeveloped as a vital link for visitors and residents of the new South quarter development connecting into the wider area of Old Town and the Westfield & Hammerson development.		
270	16		Improve the shops on offer on Waddon Rd which connects to St Johns road opposite the Church minster.	C*	<p>PARAMETERS</p> <p>The Draft Old Town Masterplan stated:</p> <p>Where these shops fall empty and are no longer in demand they should be converted in to residential.</p> <p>This text has been replaced to be in accordance with Croydon Local Plan policy. It now states:</p> <p><i>To improve the visual appearance of the street, historic shop fronts should be restored.</i></p> <p><i>Shops that lie outside the designated shopping parade where there is no demand for retail could be converted to residential.</i></p>
271	29.8		OT23. If the St Johns Road shops are converted to housing, could this be affordable housing to help those struggling to find accommodation in the community. Or could the shops become subsidised young enterprise retail and/or business schemes.	NC*	It is not the remit of the masterplan to suggest how private retail should be used or funded. Furthermore this would not be consistent with the Croydon Local Plan which states that if the level of new development is less than 10 units in size then affordable housing contributions are not required.
272	29.9		OT23. Could the St John's Road become historic styled shops from different ages which would also provide history education for young people? There could be a Tudor style sweet shop, a Georgian haberdashery, Victorian hardware shop, '50s grocers, '60s style retro etc. If it is not possible for this to occur in St John's Road may be it could occur elsewhere	NC*	<p>It is not the remit of the masterplan to specify detail on how private retail owners should design their shops.</p> <p>Also, if the public sector was to take this idea forward it would require significant investment which is currently not available.</p>

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			in Old Town?		
<b>Components</b>					
<b>OT25 Church Road</b>					
273	36.1		<b>Church Road</b> 2-way treatment to Church Road needs to be accompanied by pedestrian crossing at junction with Old Palace Road.	C*	A combined response to this comment and comments XXX and XXX is provided below:
274	36.1		<b>Church Road</b> A crossing point already exists on Church Road at the junction with Old Palace Road in the form of build outs but this is not stated in the masterplan.	C*	The text has been amended to reflect this. See below:
275	44		<b>Church Road</b> A zebra crossing might not be the best option for improving the Church Road crossing. Sparsely used zebra crossings can increase danger for school children if located close to a school. This is because children can run on to them assuming traffic will stop and drivers can be unaccustomed to stopping and forget to check if people are crossing the road.	C*	Below is a combined response to comments XXX and XXX:  Church Road was narrowed in 2013 however, it is recognised that further improvements could be made to this junction to increase safety. OT 24 Old Palace School states, "The should be a raised zebra crossing over Church Road to create a route from Old Palace School to Church Street."  OT24 has been amended to state: <i>The crossing at Church Road could be improved to increase the safety of the pedestrian route between Old Palace School and Church Street.</i>  To provide further clarification the information in OT24 information is now also provided in the 3.4 MOVEMENT PARAMETERS under PEDESTRIAN MOVEMENT. The following additional text has been inserted after the bullet point that begins, "Church Street tram stop to Drummond Road bus stop..."  <ul style="list-style-type: none"> <li>• <i>Church Street tram stop to Old Palace School: Improve</i></li> </ul>

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					<p><i>the existing crossing over Church Road, close to the junction with Old Palace Road and install a raised pedestrian crossing between Old Palace School's two sites (OT24)</i></p> <p>The bullet point entitled "Old Palace Road" has been removed as its information has been subsumed in to the new bullet point above.</p>
<p><b>Components</b> <b>OT26 Howley Road Sports Pitch</b></p>					
276	1.3		I live at 31 Howley Road and my side wall abuts the tarmac games area. I have some concerns it will be used for certain games or sporting activity.		<p>The Old Town Masterplan is a planning guidance document and cannot provide detailed guidance on management issues, however, the following text has been added to the parameters to reflect the needs of residents:</p> <ul style="list-style-type: none"> <li>• <i>Should the sports pitches are opened outside of school hours steps must be taken to protect the neighbouring properties from loss of amenity. The boundaries to the pitches would require improvement to contain prevent balls hitting neighbouring properties. In addition, the pitches would require good management and opening hours which take account of the fact that the pitches are located in a residential area.</i></li> <li>• <i>Additional trees could help reduce noise disturbance through absorbing noise.</i></li> </ul>
277	24.33		Whilst acknowledge there is a lack of play facilities for local children, concerned that opening up the Howley Road Sports pitch could result in local residents suffering from noise pollution verbal abuse and disturbance from balls being kicked in to their gardens – as occurred when opening the pitches was trialled a few years ago, despite the pitches being	C*	See response to comment above XXXXX.

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			staffed.  Would need to consider staffing, policing, opening hours, who had keys.		
278	24.34		If goes ahead request additional fencing to reduce impact on neighbouring properties.	C*	See response to comment XXX above.
279	24.35		If goes ahead request additional planting within sports pitches to absorb noise.	C*	See response to comment XXX above.
280	21.1		Object to opening up the Howley Road Sports Pitch at the weekend for the following reasons: <ul style="list-style-type: none"> <li>- I live next door to the pitch and my privacy, security and peace would be reduced</li> <li>- During the week I suffer from noise created by school girls and my wall being hit with sports equipment. Balls also come over the fence and have previously damaged my garden.</li> <li>- There is a risk of young people talking disrespectfully to occupiers of my garden as occurred when the pitch was opened in 2013 one weekend.</li> <li>- There is a risk of the flank wall of my house being graffitied as it was in 2000 when youths broke in to the courts.</li> <li>- There is a risk of my windows being broken as occurred in 2000.</li> <li>- Opening the courts was trialled in the late 1990s but was dominated by gangs of youths that were difficult to control.</li> </ul>	C*	See response to comment XXX above.
281	39.3		I do not agree with trees along Howley Road. They would threaten the shallow foundations and alter	C*	Well managed trees on this street would provide valuable

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			the balance and character of the street as well as darkening the light in houses.		visual amenity however, the following text has been added to stress the importance of managing the trees:  <i>New trees should be well managed regularly pruned to avoid restricting daylight from properties on Howley Road.</i>
282	36.2		Planting on Howley Road rather than trees. Or trees not too large. Need to understand impacts on natural light.	C*	See response to comment XXXXX.  The parameter also states that greenery could be planting or trees.
283	18.3		Welcome trees along Howley Road and Old Palace Road to reduce the concrete effect.	S*	
284	34.1		Guidance to improve Howley Road should include the following:  Better street lighting because the light levels are too low	NC*	The street lighting throughout the Borough is in the process of being upgraded and lighting levels will match national standards.
285	34.2		More greenery – such as the cherry trees in Cranmer Road	S + C*	Additional trees are already recommended within individual components such as Howley Road and Drummond Road.  Additional text in support of Street Trees has been added to the Public Realm Parameters, p42 at the end of the STREETS section. See response to comment XXX
286	34.3		Upgrading the signage which is in a poor condition.	NC*	The signage in place on the street is required to comply with National Highways Guidance.  The signs indicating the cycle-contra flow area are due to be straightened as part of the Council's regular maintenance work.

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**Components**  
**OT27 Wandle Road Car-Park, Bus Stand and Flyover Undercroft**

287	44		<p>Since the completion of the consultation draft of the Old Town Masterplan, feasibility work has been undertaken on the necessity and potential location of a district energy centre to serve development in the Croydon Opportunity Area-Feasibility work has concluded that the Wandle Road car park could be a suitable location for a district energy centre. This information and up to date position should be reflected in the revised draft of the Masterplan and parameters provided to ensure that it does not have a detrimental impact.</p>	C*	<p>An additional objective has been included:</p> <p><i>5. If no other suitable location is identified the site could provide a district energy centre to serve Croydon-Opportunity Area.</i></p> <p>The description has been replaced with the below text:</p> <p><i>DESCRIPTION:</i></p> <p><i>The site is redeveloped to accommodate other development in addition to car parking which could be a combination of all or some of the following uses - residential, commercial, district energy and/or a bus stand. The visual appearance of the boundary of the site is improved. A new connection for pedestrians and cyclists between Old Town and the area south of the Croydon Flyover through the existing car park site is installed. Creative lighting is implemented under the flyover on Wandle Road to improve the attractiveness of this pedestrian route.</i></p> <p><i>The following parameters have been added:</i></p> <ul style="list-style-type: none"> <li><i>• If a district energy centre is installed it should be sensitively designed to avoid it having a detrimental visual and noise impact on the site and surrounding area.</i></li> <li><i>• Any development should be street facing and have active frontages to improve the streetscape of Scarbrook Road, Wandle Road and Sheldon Street.</i></li> </ul>
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288	44		Given that the beer garden is considered to enhance visual amenity, could it be clearly stated that it is retained?	C*	The following objective has been added: <i>Retain the beer garden of the Royal Standard Public House.</i>
289	44		It is stated that this site fits in to the Flyover Edge category; however it is also located adjacent to a LASC that includes two-storey housing and other 4 storey housing. Therefore it would not be appropriate to build properties on the site that are substantially taller than the surrounding properties, because they would have an imposing and harmful impact on the surrounding historic environment.	C*	The following text has been added: <i>The scale and massing of any new development should not be substantially greater than that of the existing surrounding development to avoid it having a harmful impact on the historic environment. Although the site of OT27 fits in to the flyover edge typology (see Development Parameters 3.3) it is also located adjacent to the Laud Street Local Area of Special Character to the south that includes two storey terraces and other surrounding properties that are between two and four storeys in height (see Figure XXX within Old Town Today).</i>

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