For General Release

REPORT TO: CABINET 16 December 2019
SUBJECT: Place Regeneration
LEAD OFFICER: Shifa Mustafa Executive Director, Place
Stephen Tate Director Council Homes, District and
Regeneration
CABINET MEMBER: Cllr Paul Scott and Cllr Stuart King, Cabinet Member for
Environment, Transport and Regeneration (Job Share)
WARDS: All

CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON
This proposal cuts across a number of the Council’s corporate aims to ensure sustainable (good) growth of the borough that ensures:

- People live long, healthy, happy and independent lives
- Our children and young people thrive and reach their full potential
- There are good, decent homes, affordable to all
- Everyone feels safer in their street, neighbourhood and home
- We have a cleaner and more sustainable environment
- Everybody has the opportunity to work and build their career
- Business moves here and invests, our existing businesses grow
- We have an excellent transport network that is safe, reliable and accessible to all
- We value the arts, culture, sports and activities

FINANCIAL IMPACT
No direct financial implications arise from the recommendations in this report. Any specific proposals requiring capital investment or with implications for the council’s revenue budgets will be considered under the existing financial regulations and brought for Cabinet approval if required by the scheme of financial delegation.

FORWARD PLAN KEY DECISION REFERENCE NO.: 2419CAB
The notice of the decision will specify that the decision may not be implemented until after 13.00 hours on the 6th working day following the day on which the decision was taken unless referred to the Scrutiny and Overview Committee.

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

1. RECOMMENDATIONS

The Cabinet is recommended to

1.1 Endorse the Council’s approach to place regeneration.
1.2 Delegate to the Cabinet Member for Environment, Transport and Regeneration (Job Share) approvals of the Place Profiles before publication.

1.3 Delegate the approval of the emerging Place Plans to the Cabinet Member for Environment, Transport and Regeneration (Job Share) in consultation with the local elected members and key stakeholders for each ‘place’.

2 EXECUTIVE SUMMARY

2.1 Croydon is experiencing significant growth and change. Our population is growing and new communities are moving into the borough attracted by the fantastic transport connections, social, environmental and cultural offer and competitive house prices.

2.2 Further, this growth is set against the backdrop of a national and regional housing crisis with London needing 64,935 additional homes each year until 2029 (Draft London Plan, 2019).

2.3 Growth brings with it fantastic opportunities to improve facilities, services and living conditions for existing neighbourhoods but only when supported by the appropriate social, economic, cultural and physical infrastructure needed to ensure it is sustainable. Alongside, good design and careful development is essential to ensure the existing character and uniqueness of each of our places is a central consideration in the evolution of our neighbourhoods.

2.4 The purpose of this report is to set out a place-based approach to regeneration which will support and inform a coordinated programme of place-based investment and intervention in partnership with our communities.

2.5 This place-based approach to regeneration supplements the Council’s formal development plan (Local Plan), which sets out the vision, objectives, policies and allocations for the borough as whole and each of the 16 Places to sustainably plan for the growth of the borough.

2.6 Consultation on the Issues and Options Local Plan Review document is currently underway and is being led by the Local Planning Authority. The place regeneration framework outlined in this report is independent of this review and the formal development plan for the borough.

3 A GROWING BOROUGH

3.1 Since 2012, Croydon has seen an 8% growth in our resident population, including an 11% increase in our under-16s and a 20% increase in our over-65s; and the borough is becoming more diverse, with BAME residents now making up nearly half of Croydon’s population.

3.2 Taking our appropriate share of the city’s housing crisis, we know that Croydon’s population is going to continue to grow at an even more-accelerated
rate over the next 20 years as we build the much-needed homes to meet the demand.

3.3 Croydon’s emerging housing strategy has begun to identify the specific housing needs in the borough and highlighted both the immediateness and scale of the demand. For example, on 31 March 2019 there were 653 homeless households in bed and breakfast hotels in Croydon, including 1,010 children.

3.4 Whilst we acknowledge the need to provide a significant number of new homes to support the capital’s housing crisis, it is essential that we manage this growth in a sustainable way that provides for the optimum social, cultural, economic and environmental outcomes for all of our communities. We must not lose sight of the uniqueness of place nor miss opportunities to support all our communities to benefit from the many opportunities that growth can provide. This might include, for example: improved transport connections; new social and cultural infrastructure provision; improved digital connectivity; more investment in our parks and open spaces; measures to tackle air pollution and reduce car travel; improvements to the public realm; and improved footfall in our high streets to help them prosper.

3.5 As our emerging Local Plan sustainably responds to the Draft London Plan, our programme of regeneration accords with the Mayor of London’s Good Growth principles which plan for growth on the basis of its potential to improve the health and quality of life of all Londoners, to reduce inequalities and to make the city a better place to live, work and visit. It uses the opportunities of a rapidly-growing city to plan for a better future, using each planning decision to improve London, transforming the city over time. It plans not just for growth, but for Good Growth – sustainable growth that works for everyone, using London’s strengths to overcome its weaknesses\(^1\). The key principles of good growth are:

- **Building strong and inclusive communities**
- **Making the best use of land**
- **Creating a healthy city**
- **Delivering the homes Londoners need**
- **Growing a good economy**
- **Increasing efficiency and resilience**

3.6 As such, we are looking to develop a borough-wide growth strategy that aligns with the Local Plan, London Plan and Mayor of London’s Good Growth principles and establishes a framework of sustainable growth. We will learn from the work currently underway in our metropolitan centre to deliver a multi-faceted approach which places the socio-economic needs of the borough at the heart of our regeneration plans as we plan for and manage the development of new housing and infrastructure over the next decade and beyond.

3.7 The Council is also developing a borough-wide Communities Strategy which will have a direct relationship with our place regeneration work and will focus on working in partnership to develop the best outcomes for our borough.

\(^1\) Draft New London Plan
Similarly, the Place regeneration programme will align closely with the work of the Council’s localities model. The Place Profiles will draw on the fantastic work already underway to identify need within our neighbourhoods and the move towards providing a joined up approach to service provision within those localities. Place Plans will build on and be informed by this work, ensuring that appropriate places and spaces for this locality working are included in the provision of community infrastructure in that place now and in the future as the population grows and changes.

WORKING TOGETHER

The Council can not, however, do this alone. We need the support of our partners and of our communities to deliver against these principles. We need to collectively take an objective approach to agreeing priorities within and across our neighbourhoods and we need fully collaborative partnerships with local communities to ensure we are working together to realise the potential and deliver the growth as defined in the Local Plan for each of our 16 places.

Following the Council’s commitment to devolution, the Council will support the establishment of locally-representative groups, empowered to take action and influence Council spending in their neighbourhoods, equipped with the information they need to make informed decisions about their areas.

This will follow the fantastic examples of community-led plans already underway in South Norwood and Kenley which have demonstrated the hugely positive impact of a community-driven approach to influencing and accommodating growth and change within those neighbourhoods. The Council is keen to encourage this model to develop across other places in the borough by building on and learning from the experience of South Norwood and Kenley.

PLACE-BASED REGENERATION

Croydon’s strength is it’s diversity. Made up of 16 unique neighbourhoods that overlap at the boundaries and contain areas of distinct character and identity, the borough’s ‘places’ provide a wonderful mix of communities each with their own needs, priorities and opportunities.

Croydon’s bid to be London’s borough of culture 2023, is based on a celebration of this diversity and a programme of events and activities that will recognise the amazing individuals and communities that live in our borough.

But with this diversity we also have disparity. Across the borough, we have children within the most 20% most deprived in the country in Addington, and children in the 20% least deprived in Sanderstead. Similarly, a child born in the Croydon Opportunity Area between 2011 and 2015 can expect to live to age 79, whereas, a child born in the same period in Shirley can expect to live up to age 87 years. Only 1% of households in Addiscombe have access to

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2 Index of Multiple Deprivation, 2015
3 Public Health England’s ‘Local Health and Life Expectancy’ dataset, 2017
open space, compared to 39% of households in Crystal Palace\(^4\); and whilst Addiscombe has only 2% of retail units vacant, Waddon has a 27% vacancy rate\(^5\).

4.4 Within each of our neighbourhoods, there are also pockets of need, hidden by ward level statistics, but made apparent through the sharing of intelligence across council departments and through regular dialogue with our communities.

4.5 The Croydon Opportunity Area is leading an ambitious growth and regeneration programme that will provide opportunities for the whole borough through the provision of new social, economic and cultural infrastructure, new improved transport facilities and connections and the attraction of new enterprise and programmes of activity that will raise perceptions of Croydon outside of the borough and pride within.

4.6 To achieve ‘good growth’ across all of the 16 places of Croydon, however, we must recognise the wider need and opportunities of each neighbourhood. As such, the Council will adopt a careful and coordinated place-based approach to regeneration that channels investment and intervention in a sustainable way and respects and evolves the existing characters of place. We must recognise the uniqueness of each of our ‘Places’; the existing priorities for those neighbourhoods; and the infrastructure required to support the needs of the community, both now and into the future, as our ambitious growth plans are realised.

4.7 To do this, we will lead on establishing an evidence-based approach to agreeing priorities for investment and intervention in our neighbourhoods, starting with the creation of 16 Place Profiles for the borough.

4.8 Made publically available via the Council’s website, the Place Profiles for each of the 16 ‘places’ of Croydon will supplement the existing Local Plan evidence base (on character, infrastructure need and housing need for example) and establish a new evidence base of need and priority across the borough which will be used to shape and inform a multi-disciplinary programme of Council work within each place; as well as helping to influence the investment of our partners, funders and developers; and to empower and enable local communities to understand the need in their local area and take action.

4.9 Place Profiles will be a summary of key data sources available at a place level and will provide a new tool for supporting place-based decisions on priority and need. They will be tested with local elected members and relevant community and business representatives to help to validate the information and provide a local perspective.

4.10 The Place Planning work will also help to shape and influence Section 106, Community Infrastructure Levy (CIL) Local Meaningful Proportion and ward budget spend in each place based on the evidence of need established and linked to mitigating the impact of development growth planned. The work will provide an evidence base which, in consultation with ward members and plan

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\(^4\) Index of Multiple Deprivation, 2015
\(^5\) Croydon Annual Monitoring Report
panels, will outline the projects to be funded by the Local Meaningful Proportion (LMP). As such, at this stage, bids to the Infrastructure Funding Group will be encouraged for an allocation of CIL LMP monies to enable the development of place plans or place regeneration activity and projects bespoke to the needs of each place, but compliant with the CIL Regulations.

4.11 This approach will ensure that the governance and administration of CIL Local Meaningful Proportion will be proportionate and that a Service and Project Manager is identified to deliver the project. It will also ensure the CIL LMP is spent in the Places the funding is needed most.

5 **COMMUNITY PLACE PLANS**

5.1 Equipped with the evidence base established through the Place Profiles, locally representative groups will be enabled to take a lead in setting the priorities for their neighbourhood as it grows and evolves.

5.2 Developed in partnership between local communities and the Council, community place plans are well-placed to influence Council spending and intervention in each place; to support funding applications for additional investment in the local area; and, most importantly, to encourage a coordinated programme of action across all agencies, stakeholders and community members living and operating in that neighbourhood.

5.3 Community/place plans will take a variety of different shapes and formats, influenced by the uniqueness of the ‘place’ it represents and the specific need, priorities and opportunities related to that community.

5.4 For some, this might be as simple as an annual action plan of priority projects, discussions and events that the local community has identified as important; for others a more comprehensive document might be more appropriate, addressing a broader range of topics and priorities and drawing in the support and intervention of a number of partners and stakeholders. In some neighbourhoods, a more formal neighbourhood plan route might be the most appropriate way for the local community to have their say on the growth and development in their area.

5.5 Whichever route the local community chooses, the Council will support and enable these place plans as far as possible within the resources available and drawing on the data and intelligence available across the Council and its partners.

5.6 And, whilst we have reservations about the neighbourhood plan process due to the levels of complexity and workload required by volunteer community representatives; the community/place plan approach could be helpful in providing a gateway towards developing neighbourhood plans.

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6 Once adopted, neighbourhood plans form part of the borough’s development plan for the purposes of planning decision making.
Two recent examples of where this community and council partnership work has proved successful in the development of community place plans are South Norwood and Kenley as detailed below.

**Case Study 1: South Norwood**

5.8.1 In 2016, a new ‘Town Team’ was established in South Norwood, formed of local community organisations, businesses, faith groups, schools, businesses, resident groups and local councillors. The ‘Team’ first came together to develop a Community Economic Development Plan (CEDP) for South Norwood following a successful bid to the Department for Communities and Local Government by People for Portland Road (PPR) for inclusion in a programme to support the development of CEDP’s in local communities.

5.8.2 The group produced ‘Taking Control of Our Own Destiny – South Norwood’s Community Economic Development Plan (CEDP)’ in May 2017 [http://www.welovese25.org/downloads/norwood_ced_plan.pdf](http://www.welovese25.org/downloads/norwood_ced_plan.pdf). This plan set out a series of nine projects to be undertaken in the SE25 area that were developed following extensive consultation with the local community and businesses.

5.8.3 In 2016 Croydon Council resolved to establish three pilot schemes devolving responsibilities to local communities. One of the pilot areas selected was South Norwood. Following consultation between the members of the un-constituted We Love SE25 group, the local Councillors and the Council, it was agreed to combine the two initiatives to create ‘We Love SE25 – The South Norwood Town Team’.

5.8.4 Now a collaboration between the town team and the Council, We Love SE25 was formally constituted in 2018 with the core aims of:
- Developing We Love SE25 to Deliver Change
- Reconnecting Our Community with Our Local Businesses
- Strengthening Our Community through Learning, Working and Playing
- Bringing Empty Property Back in to Use
- Increasing local employment, business ownership and successful business
- Re-creating a Pleasant Modern Market Town Environment – encouraging locals and visitors to spend time and money in SE25
- Involving the Whole Community in ‘Our Community’
- Embracing local heritage and environment

5.8.5 In 2018, We Love SE25 published a Community Plan for South Norwood which established a set of principle recommendations for intervention in the area in recognition of the significant change that was already underway and set to continue. The Community Plan can be viewed here: [https://issuu.com/welovese25/docs/south_norwood_community_plan_novemb](https://issuu.com/welovese25/docs/south_norwood_community_plan_novemb)

5.8.6 The development of the plan involved a lengthy period of in-depth research and local engagement, building on the work of the We Love SE25 Community Economic Development Plan which preceded it; to arrive at four key themes:
- Creating a stronger local identity for South Norwood
- Creating strategies to activate vacant units on the high street
• Enhancing existing community assets
• Strengthening existing community networks; building the capacity of local businesses and groups.

5.8.7 The work undertaken to develop the Plan, involving significant consultation and engagement with the local community, led to a successful bid to the Mayor of London’s Good Growth Fund which is now seeing a £2.3m programme of investment in the area that will provide improved community hubs, enhanced public realm, better place-making and activation of the high streets.

5.9 Case Study 2: Kenley

5.9.1 Following an extensive consultation exercise in September and October 2018, the council adopted the, now award-winning, Suburban Design Guide (Supplementary Planning Document 2) on the 1st April 2019.

5.9.2 Within the Design Guide, three zones of Focussed Intensification were identified from evidence which indicated that there were areas with established infrastructure but relatively low density and the potential to accommodate a significant increase in residential development to meet the borough’s housing target. One of these zones is the area around Kenley station.

5.9.3 Through the consultation undertaken with the community of Kenley during the development and adoption of the SPD, a number of key areas of concern were raised, by local community members and resident associations, about the potential for adverse impacts arising from the planned intensification of the neighbourhood.

5.9.4 In response, the Council applied for funding from the Mayor of London’s Good Growth Fund to enable a period of more in-depth consultation and engagement with the local community towards developing a community plan for Kenley that can help to manage this growth in a way that allays the concerns of local residents and realises the potential benefits for the existing community that such growth can bring.

5.9.5 Since February 2019, the community of Kenley has been supported by the Council to develop a Community Plan for Kenley that acknowledges the significant uplift in housing that the area will be experiencing over the next 20 years, as defined in the Local Plan, and seeks to identify the social and physical infrastructure that is needed to ensure that this development trajectory follows the principles of Good Growth.

5.9.6 Over the past eight months, a series of face-to-face engagement activities and events; online surveys; business surveys; and transport and traffic surveys have been undertaken to identify a series of priorities for both supporting the existing community now and laying the foundations for good growth in the future. These include:
• Recognising the pockets of deprivation and unemployment in the area and ensuring appropriate services and community and economic infrastructure is in place to support those on lower incomes; particularly young people.
• Ensuring that the growth planned for the area does not increase the exclusion experienced by these groups
Identifying sustainable transport options for the community; in the context of challenging topography.

Addressing the significant flooding issues.

5.9.7 The Kenley Community Plan is expected to be published early in 2020 and will be used to inform a bid to the next round of the Good Growth Fund, currently available from the Mayor of London, to support the implementation of a range of initiatives designed to address the above priorities.

5.9.8 Further information is available here: https://www.croydon.gov.uk/planningandregeneration/regeneration/places/kenley-community-plan/introduction-kenley-community-plan

5.10 Case Study 3: Selsdon

5.10.1 Whilst currently in its infancy, elected members of Selsdon have begun a process to lead the development of a community plan for the area. Data on the need and priorities for Selsdon is currently being collated a community day to start drawing input from a wider community representation is scheduled in November.

5.10.2 The process for the development of the subsequent plan will respond to the specific context of Selsdon but will draw on the lessons learned and experience gained through South Norwood and Kenley.

6 CONSULTATION

6.1 A number of service areas across the Council have been consulted on the proposals for Place Profiles and Place Regeneration and, where received, their feedback has been incorporated into the content and design of the approach outlined in this paper. In addition, consultation with the following partner groups and organisations has led to the formation of this proposed place-based approach:

- Croydon Clinical Commissioning Group
- Transport for London
- Greater London Authority
- Resident associations; community groups and representatives
- Business Improvement Districts

6.2 The upcoming Local Plan consultation also provides a significant opportunity to inform this work and will be reviewed alongside the publications of the Place Profiles.

6.3 Future consultation on the emerging Place Profiles and subsequent SWOT analysis of place will draw on the consultee list above as relevant.

6.4 Further, the Cabinet Members for Environment, Transport and Regeneration (Job Share); Economy and Jobs; and Homes and Gateway Services have been consulted on the proposals and will continue to receive regular updates as the Place Profiles progress.
6.5 Local elected members will be consulted on the relevant Place Profiles through the established place-based member briefings that take place on a regular basis.

6.6 Local community groups, businesses and wider representatives will be consulted on the published Place Profiles through established and emerging place-based steering groups and/or through other communication methods.

7 PRE-DECISION SCRUTINY

7.1 This item will be taken to the Streets, Environment and Homes sub-committee in March 2020.

8 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

8.1 The recommendations set out in this report do not have any direct impact on the council’s financial planning and budget strategy. The work required to develop the Place Profiles falls within the Council’s Regeneration Team resource. The development of Place/Community Plans will require additional funding but this will be sought through external funding sources as far as possible.

8.2 Any specific proposals requiring capital investment or with implications for the council’s revenue budgets will be considered under the existing financial regulations and brought for Cabinet approval if required by the scheme of financial delegation.

Approved by Kate Bingham, Head of Finance on behalf of Lisa Taylor, Director of Finance, Investment and Risk and s151 Officer.

9 LEGAL CONSIDERATIONS

9.1 The Director of Law and Governance comments that the recommendations set out in this report are within the powers of the Cabinet. There are no other legal implications for consideration at this time arising directly out of the recommendations.

Approved by: Sean Murphy, Director of Law and Governance and Deputy Monitoring Officer.

10 HUMAN RESOURCES IMPACT

10.1 There are no specific HR issues arising from the contents of this report, if any arise these will be managed under the Council’s policies and procedures.

Approved by: Jennifer Sankar, Head of HR Place & GSE for and on behalf of, Sue Moorman, the Director of Human Resources.
11 EQUALITIES IMPACT

11.1 A key priority for the Council is to work with our partners to make Croydon a stronger fairer place for all our communities. Croydon’s Opportunity and Fairness Plan 2016-20 outlines actions to tackle inequalities such as educational attainment, health, homelessness, unemployment, crime and social isolation, particularly in the borough’s six most deprived wards.

11.2 The proposed approach outlined within this paper is to ensure the principles of Good Growth within our growth plans, which includes ‘investing to provide more inclusive neighbourhoods and districts that are inviting places to live, work and visit. Helping to improve the health and wellbeing for all residents.’

11.3 It is essential that we manage this growth in a sustainable way that provides for the optimum social, cultural, economic and environmental outcomes for all of our communities. We will ensure all our communities benefit from the many opportunities that growth can provide.

11.4 We will work in partnership with partners and communities to deliver against these principles and establish local groups that are representative of all communities to support this. Locally representative groups will be enabled to take a lead in setting the priorities for their neighbourhood as it grows and evolves. The Place Profile approach is intended to provide an objective, evidence-based approach to influencing the Council’s investment and intervention in each of the 16 places of Croydon.

11.5 Further, the evidence base provided will be made publically available to enable local communities to identify need within their communities and take the relevant actions, including the development of locally-representative community plans, following the good examples of South Norwood, Kenley and Selsdon.

11.6 As such, an Equality Analysis is not relevant to this paper but will be undertaken against any of the specific aspects of the programme e.g. consultations as well as for specific interventions or investment decisions that may follow from the Place Regeneration programme as appropriate and following the Council’s guidance.

Approved by: Yvonne Okiyo Equalities Manager

12 ENVIRONMENTAL IMPACT

12.1 The proposals outlined within this report are focused on the premise of following Good Growth principles which includes: Identifying initiatives and working with colleagues to build resilience to our changing climate and investing in our neighbourhoods and districts to ensure they are green and healthy. This means clean air, easy access to green space, more efficient buildings supplied by cleaner energy, and a move towards zero emission transport.

12.2 Project work will be delivered in line with current environmental requirements and legislation, and the Local Plan policy which promotes, as part of
sustainable development, the consideration of environmental impacts. This will include a focus on improving air quality and enhancing facilities for healthy lifestyles and sustainable transport.

12.3 With the Council’s recent declaration of a Climate Emergency, coupled with ambitious growth targets over the next 20 years, it is clear that there is a significant need to coordinate this growth on both a local and borough-wide basis to ensure any environmental impacts of development are prevented or mitigated as far as possible. This will be an integral part of coordination of Council investment and intervention in place that the Regeneration Team will now oversee.

13 CRIME AND DISORDER REDUCTION IMPACT

13.1 As above, the proposals to follow the principles of Good Growth will include an integral consideration of the opportunities to address underlying issues of crime and disorder and prevent creating future issues through the principles of good design and strong community collaboration.

14 REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

14.1 The report seeks delegated authority for the Cabinet Member for Environment, Transport and Regeneration (Job Share) to approve the publication of final versions of the Place Profiles and emerging Place/Community Plans in order to establish a place-based approach to Good Growth across the borough.

15 OPTIONS CONSIDERED AND REJECTED

15.1 We are working towards a borough-wide growth strategy for the borough which will provide an overarching framework for the regeneration programme building on the place planning approach.

15.2 The 2018 Local Plan establishes Place-specific overarching vision, policies and allocations and the emerging Local Plan Review is currently consulting on place-based growth targets.

15.3 Such planning policies are already enabling significant growth to progress across the borough.

15.4 Without further intervention, growth will still occur and will be managed as far as possible by the development management and planning process within the parameters that the planning process allows.

15.5 The alternative option of following a place-based approach to regeneration, as outlined in this report, however, will enable a more coordinated approach to growth, rooted in a strong evidence base that enables a more efficient multi-disciplinary response to growth across the different Council services and works to empower local residents, businesses and communities to identify wider interventions necessary to ensure adherence to the Good Growth principles.
16 DATA PROTECTION IMPLICATIONS

16.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF ‘PERSONAL DATA’?

YES

Whilst the Place Profile will draw on publicly available data sources; the subsequent development of place/community plans will be rooted in community consultation which will necessarily involve the processing of some personal data to ensure full representation. Such processes will follow GDPR regulations and Data Protection Impact Assessments will be completed as necessary.

16.2 HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?

NO

Individual DPIAs will be completed for each project before any consultation or engagement work is carried out.

Approved by: Stephen Tate, Director, Council Homes, Districts & Regeneration

CONTACT OFFICER: Lucy Webb, Head of Regeneration, lucy.webb@croydon.gov.uk

BACKGROUND DOCUMENTS: None