

To: Pete Smith - Head of Development
Management
Complaints Resolution Team
Bernard Weatherill House
8 Mint Walk
Croydon
CR0 1EA

**Monks Orchard Residents' Association
Planning**

1st December 2019

Emails:

pete.smith@croydon.gov.uk
complaints@croydon.gov.uk

planning@mo-ra.co
chairman@mo-ra.co
hello@mo-ra.co

**Corporate Complaint CAS-105503-W1M7W2
37 Woodmere Avenue (LBC Ref 19/03064/FUL)
Escalation to Stage 2.**

Dear Mr Smith and Complaints Resolution Team

Thank you for your response of 14th November 2019 to our Stage 1 **CAS-105503-W1M7W2** complaint in respect of the Case Officer's Report regarding the Planning Committee's decision (at its meeting of 26th September 2019) to grant planning permission for the demolition of existing dwelling at 37 Woodmere Avenue and the erection of two storey building (with roof-space accommodation) comprising 8 flats (1 x 3 bed, 5 x 2 bed and 2 x 1 bed) with associated car parking, private and communal amenity space and cycle and waste/recycling stores. The planning permission was issued on the 30th September 2019.

We appreciate your acknowledgement of our complaint but we again have a number of concerns regarding your response that we need to challenge and examine in further detail to establish the validity of your assessment. After detailed analysis of your response, our comments to your response are set out below which we would appreciate being raised to a Stage 2 Complaint in accordance with your procedures:

Your response wording is in red text.

Your original complaint was:

1. Our apparent failure to properly interpret development plan policies to ensure cumulative development proposals fully meet the requirements for the locality's existing and planned public transport infrastructure – linked to application of the London Plan Density Matrix
2. Our apparent failure to properly consider the impact of the development on the amenities of the neighbouring occupier at 2B Tower View (in terms of outlook and enclosure and loss of privacy)
3. Our apparent failure to properly consider the design of the proposed development and the extent to which it complemented the existing character and appearance of the area;
4. Our approach when considering planning merits of proposed development in the balance – with priority afforded to housing targets over other planning

**Representing, supporting and working with the local residents
for a better community**

Your response:

My Findings:

“In many ways these issues have been previously raised and responded to in relation to previous complaints about other development proposals in an around Shirley; a number of which have also been investigated by the Local Government Ombudsman. In all cases, the Local Government Ombudsman has found in favour of the Council with no evidence of maladministration; I would respectfully suggest that there is no evidence of maladministration in this case either.”

Our Response:

The reason that these issues have previously been raised – and we continue to raise them, is because we have NOT had a satisfactory answer which resolves our concerns regarding adherence to Policy or lack of Policy, and therefore the same or similar complaint recurs. We only object to planning proposals on grounds of **non-compliance to adopted planning policies** and the current **adopted** Planning Policies are the **NPPF (2019)**, **The London Plan (2016)** and the emerging **Draft London Plan**, the **Croydon Local Plan (2018)** and the guidance afforded by **Supplementary Planning Guidance – Suburban Residential Developments SPD2 (2018)**.

In a previous Complaint (19/00783/FUL), your Stage 1 response indicated that you were “impressed with the extent to which MORA analyse the various planning issues”, but there is no evidence to show that the LPA has taken any account of our detailed objections or required the applicants to reconsider their proposals to address non-compliance to Planning Policies identified in MORA’s objection letters.

The planning policy documents appear to have been repeatedly disregarded without adequate or requisite reasoning or justification by the Planning Authority. Despite our efforts, through our representation objection letters, the official complaints procedures and escalation to the Local Government Ombudsman, there still does not appear to be any legitimate explanation for the continual disregard of these Policies which are highly-regarded by residents and those in the local community.

We do not currently have an opportunity to appeal to the Planning Inspectorate against approvals which we believe breach planning policies and we do not have the funds to legally challenge an approval in breach of planning policies by Judicial Review, so our only recourse is to use the Official Council Complaints Procedures and escalation to the Local Government Ombudsman in order to achieve some level of understanding as to the circumstances behind these seemingly arbitrary Planning Authority decisions for the benefit of the residents we represent.

You Continue:

“I was not present at this particular Planning Committee and have therefore reviewed the webcast – including the officer’s presentation, the various questions and items of clarification raised by Planning Committee Members, comments made by the speakers (for and against) and the Planning Committee debate. It is clear to me that all the points you highlighted in your letter were either responded to by officers (in response to Member’s questions) or were properly aired during the debate. I am therefore at a loss to understand the context of this formal complaint when the various issues were discussed and dealt with by the Planning Committee.”

After re-watching the webcast, the debate by Cllr. Streeter was based upon analysis of current adopted policies whereas Cllr. Paul Scott was adamant that analysis of Policies mechanistically was inappropriate. However, it was clear from the debate that Cllr. Paul Scott had no alternative

methodology to realistically determine acceptability or otherwise of compliance to policies other than by a subjective and vague analysis – which is NOT an acceptable methodology as it is open to personal interpretation which could lead to corruption and fraud. The policies should provide a clear indication of acceptability of **compliance or non-compliance** for a locality to meet the current published **NPPF Policy 16 d)**. Which states:

16. Plans should:

- d) contain policies that are **clearly written and unambiguous**, so it is **evident** how a decision maker should react to development proposals;

As you appear to be at a loss to understand the context of this formal complaint, then I shall make this as clear as possible. Our formal complaint relates to the continued disregarding of Planning Policy and the failure to apply these policies when debating and considering this and related planning applications. Where a decision deviates from a Policy, **clear justification** should be provided which **substantiates the reasoning supporting a decision to deviate from adopted policies**.

1 Failure to apply the current adopted London Plan Policy 3.4 to Optimise the Housing Potential in accordance with the Policy on Residential and Housing Density appropriate for the locality at a suburban setting and at PTAL of 1a based upon a false determination of Residential Density by incorrect analysis of number of Habitable Rooms.

2 Failure to consider the overbearing nature of the proposed development to 2b Tower View with regard to Policy SPD2 Figure 2.11c: Height of projection beyond the rear of neighbouring properties to be no greater than 45 degrees as measured from the middle of the window of the closest habitable room on the rear elevation of the neighbouring property.

3 Failure to consider the unreasonable closeness of facing windows at Unit 1 overlooking and invasion of privacy toward (bedroom) window at the adjacent bungalow at 2b Tower View at separating distance of **5.25m**.

4 Overbearing massing of proposed development in relation to surrounding properties.

5 Infraction of Planning Policies on grounds that it is more imperative to meet housing targets than to countenance and implement adopted Planning Policies.

These are all related to the management of development proposals for the locality.

As you have reviewed the webcast, you will acknowledge that although questions were asked relating to these issues, the responses were not forthcoming, and **justification for the decision was not substantiated**, the usual response was **“Planning Officers took the view ...”** and the questions were dismissed as irrelevant or unsubstantiated. The substance of the policies was not debated and the very real concerns about adherence to policy and cumulative effects of proposals were dismissed.

The actual basic substance of the Policies was NOT debated but Cllr. Paul Scott made a subjective and vague interpretation of all related Policies.

You Continue:

“We are obliged to determine applications in accordance with the development plan (considered as a whole) unless other material considerations indicate otherwise. The Supplementary Planning Documents, including the London Mayoral Housing SPG and the

Council's own Suburban Design Guide SPD, do not enjoy the same weight as the various constituents of the development plan and are treated as other material planning considerations. As the titles suggest, they merely provide guidance in support of development plan policy and do not enjoy the weight of S70(2) of the 1990 Act."

We entirely agree that "you are obliged to determine applications in accordance with the development plan (considered as a whole) unless **other material considerations** indicate otherwise" – and as the Development Plan includes the **NPPF**, **The London Plan** and the **Croydon Local Plan** including **SDP2** – all these documents give relevant guidance on Planning Policies which should all be considered and adhered to unless **material reasons** are provided for **NOT** doing so.

Our concern is that these **material conditions** for **NOT** observing the guidance is **NOT** forthcoming or stated in either the **Case Officers Reports** or at **Planning Committee Meetings**.

Housing Density Matrix

The Housing Density Matrix was introduced as part of the First London Plan back in 2004, well before the introduction of the National Planning Policy Framework and the realisation of the current pressures being placed on London Boroughs to deliver exceptionally challenging housing targets – and maintaining a 5-year housing supply for the foreseeable future. It has been long considered that the Housing Density Matrix is no longer fit for purpose and whilst it is appreciated that it remains part of the London Plan (in its current iteration) its weight (as a material planning consideration) is relatively limited. As you will be aware, the supporting text advises that a consideration of housing density is only the start of planning housing development; not the end and it would be unacceptable to apply the density matrix mechanistically.

Our Response:

You infer that **The London Plan Density Matrix** is no longer "**fit for purpose**" and is therefore being disregarded, but there is currently **NO** replacement policy to manage "**over-developments**" in local communities.

I reiterate – "**what is the Croydon Local Planning Authority's Policy on managing Residential and Housing Density** in relation to the **available local public service infrastructure and Public Transport Accessibility**" – if you are disregarding the current adopted Policy?

It seems very evident that if the current adopted Policy is disregarded, there is **NO** Policy to manage "overdevelopment" proposals as there is **NO** policy to evaluate whether a proposal is overdevelopment or meets the requirement of **NPPF para 122**.

The Croydon Local Plan States:

6.37 The Croydon Local Plan provides policy on urban design, local character and public realm. However, in line with the National Planning Policy Framework, **there is a need to provide detailed guidance on scale, density massing**, height, landscape, layout, materials and access. This will provide greater clarity for applicants.

We respond to that statement – there is NO detailed guidance on scale, density or massing within the Croydon Local Plan.

**Representing, supporting and working with the local residents
for a better community**

And at:

DM10.1 Proposals should be of high quality and, whilst seeking to achieve a minimum height of 3 storeys, should respect:

- a. The development pattern, layout and siting;
- b. **The scale, height, massing, and density;**
- c. The appearance, existing materials and built and natural features of the surrounding area; the Place of Croydon in which it is located.

There is NO quantifiable definition of respecting the scale, massing or density of a proposal, provided in the Croydon Local Plan.

And at Croydon Local Plan - Table 6.4 States:

Evolution without significant change of area's character	Each character type has a capacity for growth. Natural evolution is an ongoing process where development occurs in a way that positively responds to the local context and seeks to reinforce and enhance the existing predominant local character. Most development throughout the borough will be of this nature.
Guided intensification associated with enhancement of area's local character	Areas where the local character cannot be determined as a result of no one character being dominant, further growth can be accommodated through place specific enhancement policies.
Focussed intensification associated with change of area's local character	Further growth can be accommodated through more efficient use of infrastructure. Due to the high availability of community and commercial services, intensification will be supported in and around District, Local and potential Neighbourhood Centres which have sufficient capacity for growth.
Redevelopment	In larger areas where growth would result in a change to the local character it must be supported by masterplans or design codes.

But there is **no specification for the appropriate Density** for **any** of these **designated localities** or for the differentiation of appropriate **Densities** for **any** of these **designations**.

These Policy definitions are **meaningless** but allow increased densities **without any limitations** or relationship to the **available or planned supporting infrastructure** or **Public Transport Accessibility** across the **Borough**, and therefore any locality is at risk of **significant overdevelopment with absolutely no relationship to the availability of public services to support the proposed development(s)**.

You Continue:

"The points raised in your letter were raised by Councillor Streeter (when questioning officers) and a clear response was given that the open plan kitchen/dining/living area could reasonably be treated as a single habitable room. When I started out as a development control officer (as it was termed in the 1980's) a room exceeding 35 square metres in area could potentially be considered as two habitable rooms (from a density calculation point of view) also depending on the overall shape of the room; but that was over 30 years ago and much has changed over the years. ..."

**Representing, supporting and working with the local residents
for a better community**

Our response:

You refer to previous agreed analysis of parameters to differentiate the size of habitable Rooms to determine whether an **Open Plan Configuration** could be considered as separate habitable rooms - but argue that the passage of time has modified these parameters. This is not a sustainable argument as dimensions have **NOT** changed just because time has marched on. The only change over time has been the non-observance of a once agreed policy without an agreed replacement definition of the policy. Although much has changed over the years, it appears that the parameters which were once essential in reducing the effect of overdevelopment of an area have simply been removed instead of refined, leading to the very real likelihood of overdevelopment on a vast scale.

This assumption that the two functional areas as designated on the applicant's plans were in fact one habitable room is another way of reducing the impression of high density as the Residential Density has historically been calculated on the number of habitable rooms per hectare – not the **number of bed-spaces per hectare** which would give a better parameter for density by relating the number of **occupants per hectare**, as it is the **occupants of a development** that require the provision of **public services and facilities** – **not habitable rooms**.

You continue:

“The fundamental point (as highlighted by Councillor Scott) is that such a arithmetic approach to residential density is no longer relevant and your suggestion that we should have treated this open plan space as two habitable rooms takes us to a new level of mechanistic interpretation which is no longer relevant.”

Our response:

Why is such methodology “no longer relevant” if there is no other suitable replacement methodology? There is no alternative policy to define a proposal's density or to determine the effects of higher density on the local area. Your adopted methodology is a subjective analysis with no parameters to define acceptability or unacceptability. What is so inappropriate to specify limiting parameters or criteria that define the acceptability (or unacceptability) of a proposal for a locality, based upon the available input parameters?

Thus far, some developments determined as acceptable have failed the 45-degree rule, have very limited amenity space, very limited in-built storage space (so future occupiers have nowhere to retain the normal living clutter, decorating equipment, Christmas decorations ex-cetera, over time), and have limited vehicle access. One wonders what would constitute an ‘unacceptable’ development, when thus far current existing parameters have repeatedly been breached and therefore deemed as ‘acceptable’.

This fundamental policy deficiency is the cause of our continued complaints as there is **NO stated policy on Densities** which reflect the requirement of **NPPF paras 16 & 122**. Which states:

16. Plans should:

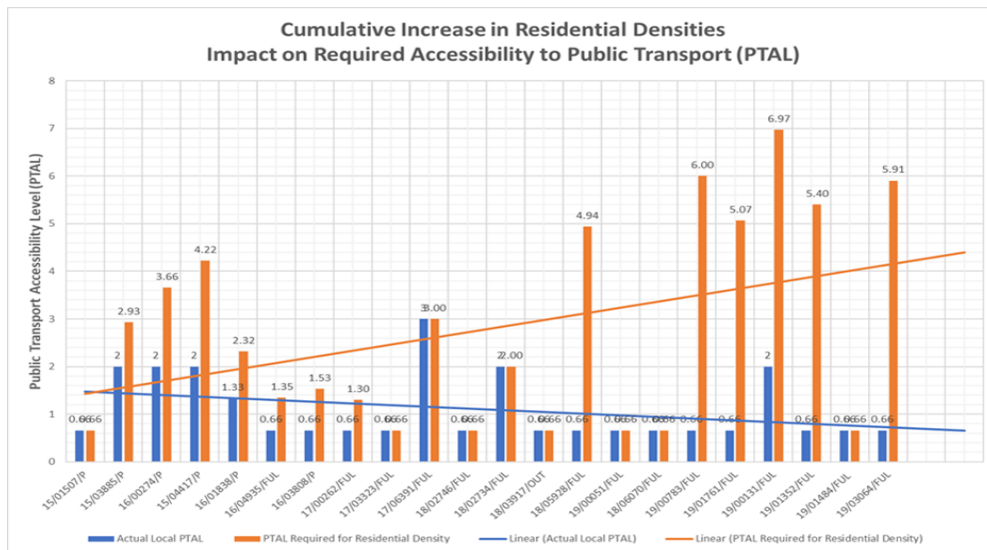
- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

Achieving appropriate densities

122. Planning policies and decisions should support development that makes efficient use of land, taking into account:

- the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- local market conditions and viability;
- the availability and **capacity of infrastructure and services** – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- the desirability of maintaining an area's **prevailing character** and setting (including residential gardens), or of promoting regeneration and change; and
- the importance of **securing well-designed**, attractive and healthy places.

The cumulative effect of ignoring the policy is shown on our recorded histogram below:



Excessive PTAL Requirement above the Local available PTAL due to Increased Densities of Applications in the MORA Post Code Area showing the ongoing PTAL linear trend.

You continue:

“You will be aware that the London Plan Panel Report has now been issued by the Planning Inspectorate which supports the intended deletion of the density matrix. The Panel concluded (notwithstanding the level of comment from the likes of yourselves) that the matrix is fundamentally in conflict with the design led approach now advocated – which sees density as an output and not as an input to determine the form and type of new development. Critically, it advises that enforcing a strict upper limit on density runs the risk of stymying otherwise acceptable development which would run contrary to the strategy of Good Growth.”

Our Response:

The London Plan Inspector’s Report (published on 8th October 2019) gives a clear

**Representing, supporting and working with the local residents
for a better community**

directive that **Local LPAs** are required to instigate “**Area Assessment Characterisation Studies**” to define the parameters in order to calculate the **appropriate Densities** for that locality. (see [Paras 277 & 278 of the Inspectors Report](#)).

At [Section 285 of the Inspector’s Report](#), it states of the “[Design Led Approach](#)”:

Infrastructure requirements

285. Subsequent policies relate to the site-specific context. [Policy D1A](#) seeks to ensure that **density of development proposals respond to future infrastructure capacity** and that it should be **proportionate to a site’s accessibility and connectivity**. [Policy D1A part D](#) introduces further suggested changes that set out explicitly that **infrastructure capacity ultimately will limit the scale of development** where it cannot be enhanced to mitigate the impact of development. This will ensure that the density of a development **cannot exceed a sustainable level**, even if it is acceptable in design terms. It will also help to ensure that development accords with Good Growth.

This requirement provides a “**mechanistic**” analysis of appropriate **parameters** to define the appropriate **Density** of a proposal in total contrast to Cllr. Paul Scott’s vague and subjective methodology. This methodology links the **Characterisation Studies** with planned available **Public Transport Infrastructure** for **sustainable developments** to replace the **Density Matrix** and meet the requirement of **NPPF para 122 and para 16 d**).

I note that, despite an emailed request to Steve Dennington - Head of Spatial Planning, (copied to you) there doesn’t appear to have been any confirmation that Croydon LPA has undertaken an “**Area Assessment Characterisation Study**”. Steve has responded, suggesting that my email should form the initial representation from MORA to the Local Plan Review consultation. We have now responded to Steve and copied to you, pointing out that, as the Consultation representations would not be assessed before the 13th January 2020 and the period of analysis of responses would take us well into 2020 and we could have numerous applications over that period without any management criteria for Residential or Housing Densities appropriate for the localities; we have suggested that the Spatial Planning Team advise Case Officers of an interim strategy prior to adoption of the New London Plan.

You Continue:

Effects on 2B Tower View

“Again, Councillor Streeter asked specific neighbour amenity impact questions of the presenting officer who responded clearly and robustly.

The Suburban Design Guide is (as the name suggests) treated as guidance – and it is not a “rule book”. It seeks to give guidance on what might be acceptable (in terms of the relationship between the scale and mass of buildings and neighbouring windows – and how that scale might affect the character and appearance of the area). Every case needs to be considered on its own merits – which means that the guidance contained within the SPD should be considered on a case by case basis and I am satisfied that this approach was followed in this particular case.”

Our Response:

A Design Guide – is ostensibly to guide applicants on the acceptability of their proposals which if it is to be of any use means the policy as stated should be implemented unless there are **material**

reasons NOT to do so. Otherwise it is NOT a Design Guide but a list of preferences which can be acknowledged or disregarded.

The **Design Guide SPD2** does NOT state any tolerances to allow subjectivity of interpretation for any specific proposal.

It is understood each proposal needs to be considered on its own merits but that does NOT allow the Policies of the Design Guide to be disregarded as if so, what is the point of a design guide that can be subject to acceptability on the whims of a Planning Case Officer? This is extremely dangerous, as it allows Case Officers to be open to corruption and fraud.

The effects on the Adjacent property at **2b Tower View** require compliance to the **SPD2 45° Vertical Rule** which has **two separate** specific requirements;

- a) to manage adjacent dwelling **loss of amenity** due to an overbearing nature of proposed development; and
- b) to ensure adequate **natural daylight** to an adjoining property is not significantly reduced.

These **two** requirements are **NOT mutually exclusive** as **SDP2 Policy 2.11.2** includes the word **“also”** in its definition.

Theoretically, it would be quite easy for a Case Officer to agree to relax a requirement of the **Design Guide** if an applicant made it worthwhile to the Case Officer and for the Case Officer to recommend approval against a design guide requirement without providing **conclusive satisfactory and acceptable evidence** why that guidance should be ignored.

You Continue:

“I appreciate that the immediate neighbour raised issues of overlooking to her existing side window. Whilst the proposed building was shown relatively close to the boundary, the mutual overlooking was limited by the presence of the boundary fence between the properties and requirement for high level windows (which would be obscure glazed and non-openable above 1.7 metres from internal floor level).”

Our Response:

Para 6.80 states “A minimum separation of 18-21m between directly facing habitable room windows on main rear elevations is a best practice ‘yardstick’ in common usage and should be applied flexibly, dependent on the context of the development to ensure that development is provided at an **acceptable density** in the local context.” This paragraph even refers to an **“acceptable density”** which is now undefined.

It should be recognised that the overlooked flank wall window of **2b Tower View** at a separation distance of **5.25m** is a **bedroom window** and as such is critical when determining overlooking and invasion of privacy. The prospect of an overlooked bedroom window has caused, and continues to cause, great distress to the current elderly lady owner of 2b Tower View.

This development is a two-storey building with accommodation in the roof-space replacing a one-level bungalow. As you state, this proposed building lies relatively close to the boundary of the bungalow at **2b Tower View**, which will undoubtedly be overwhelmingly imposing and is likely to significantly restrict daylight into the bedroom of **2b Tower View**.

You Continue:

Character Considerations

“The character of this part of Shirley is very varied indeed and the scale of development proposed (two storeys with accommodation in the roof) was considered to be totally in character with the area, Again this was fully debated and discussed at Planning Committee and was fully explained and examined in the officer’s report.”

Our Response:

It is noted that the Character of Shirley is varied but any redevelopment ought to be within acceptable constraints that allows any new occupants to assimilate smoothly into the area.

It is understood this is the objective of the new “**design led approach**” see [Planning Inspector’s Report para 275](#) with reference to the emerging **London Plan Policy D1A:**

275. This suite of policies provides a sequence of considerations to assist in the delivery of well-designed development, **at an appropriate density**, that responds to **local character**, form and **infrastructure capacity**. They are aimed to put design at the **core of plan making** and **decision taking**. In short, they require **boroughs to determine a local plan’s spatial strategy to meet its growth requirements based on a thorough understanding of the character of the plan area. Identified infrastructure deficiencies** should be addressed and optimised site capacities established for all site allocations and other development proposals, through the exploration of design options.

...

You Continue:

Prioritisation of the Planning Balance – Delivery of New Homes

“I make no apology for seeking to deliver new homes across the borough – which represents a weighty consideration in the planning balance. It is inevitable that changes to the “status quo” might have some small-scale effects on the character of areas and the amenities of neighbours. However, I must take issue with your suggestion that we are not implementing adopted planning policy.”

Our Response:

We agree that new homes are required. We understand that there is a need for new homes; however, in order to carry the existing community and residents to support these new homes – it is imperative that these new homes fully comply with adopted planning policies. To do otherwise creates loss of confidence in the Planning Processes by the public which is extremely unhelpful to your endeavours and that of the LPA.

You Continue:

“As previously advised, when determining planning applications, it is important that the decision-taker considers the development plan as a whole, recognising that some policy considerations might not totally align with other issues and approaches. It is for this reason why some decisions are taken in the balance, with greater weight being given to certain consideration over others.”

Our Response:

It is recognised that Case Officers must consider the development plan as a whole but any unaligned policy must be delineated and **explained in full detail** why it can be overlooked and **substantive reasoning given to substantiate the case officer's deviation from the policy**. Again, this reasoning MUST be specific and NOT subjective as any vague unspecified reasoning could be a cover for corruption which should be systemically avoided.

You Continue:

"In most cases we feel that the need to deliver more housing should reasonably counter density, car parking or amenity effects (unless serious harm is caused by the scale of development for whatever reason). Of the schemes determined in Shirley, we are satisfied that we have struck the appropriate balance and are content with the scale and effects of the flatted schemes granted to date."

Our Response:

A "Feeling" is NOT a preferred policy. This is again a rather dangerous methodology as it is a subjective definition. There should be specific parameters to define acceptability or tolerances defined to allow a degree of variability of the policy. A "**feeling**" of acceptability is inappropriate when significant sums of finance are involved in a decision.

You Continue:

I appreciate that this might run counter to your own position (and those of Shirley residents) but I stand by our recommendations to grant planning permission and the eventual decision (invariably taken by the Council's Planning Committee).

Our Response:

The record of the Planning Committee does NOT seem to be very Policy dependent as the record shows an uncanny number of politically motivated decisions. The voting record of 6:4 on numerous occasions shows a biased response and very infrequently varies from these politically appointment of Councilors results at 6:4 for approval.

The committee members do not assess proposals on policy or locality or proper planning criteria. The only criteria are whether the proposal provides more housing - whether this is the most suitable housing for the future occupants of the proposal or for the existing local residents or locality is NOT considered of any significant importance.

Can you not appreciate that **each Policy** ignored or disregarded **without credible justification** sets a **precedent** which subsequent applicants can allude to for equal reason to disregard or breach the **Policy**, ultimately resulting in a **Local Plan** with **Policies** that **cannot be enforced**.

The **Local Plan Review** consultation might just result in a **Plan** without any possible **enforceable Policies** to **manage development proposals to meet the housing targets** as the policies become less and less enforceable.



We (MORA) appreciate your response but it is very distressing that our concerns are not addressed or even considered as reasonable. We are therefore compelled to escalate the complaint to Stage 2 as these issues are fundamental to the concerns of Shirley Residents.

Please consider this response as an escalation to Stage 2 of our complaint Ref: CAS-105503-W1M7W2

This response has been agreed and authorised by all members of the MORA Executive Committee.

Kind Regards



Derek (MORA Planning Adviser).
Derek Ritson I. Eng. M.I.E.T.
MORA Planning



Sony Nair
Chairman, Monks Orchard Residents' Association.

On behalf of the Executive Committee, MORA members and local residents.
Representing, supporting and working with the local residents for a better community

Cc: Steve Dennington Head of Spatial Planning (Croydon LPA)
Steve O'Connell GLA Member (Croydon & Sutton)
Cllr. Sue Bennett Shirley North Councillor
Cllr. Richard Chatterjee Shirley North Councillor
Cllr. Gareth Streeter Shirley North Councillor

Bcc: MORA Executive Committee
Chair - Shirley Planning Forum (SPF)
Prospective Parliamentary Candidates (Croydon Central) Constituency
Interested Parties