

Planning Policy: Revised Croydon Local Plan (2022)

The fundamental outstanding issues

Executive Summary.

It is understood that the Elected Mayor, Jason Perry, has indicated a reassessment of Planning Policy is high on his priority of actions and has concerns relating to the Supplementary Planning Document (SPD2). However, the crucial issues of concern are Policies in the Revised Croydon Local Plan.

As an active Residents' Association, without being too presumptuous, we would like to contribute to this reassessment and highlight crucial issues which we believe require modification to reflect the latest National Guidance.

We assess the crucial issues as:

- 1 The deficiencies of the specified "Growth" Policies definition.
- 2 The deficiencies of the Management and Monitoring of the Croydon Place "Targets."

In the following submission, I explain the deficiencies in these policies in detail and propose alternative solutions. These issues were raised in our response to the Jan/Feb consultation, but the revised Local Plan document published on the Council Website does not acknowledge these identified deficiencies or consider our suggested modifications or clarified the Policies in any way.

The structure of this paper evaluates the current adopted Local Plan and the Revised Croydon Local Plan and relates those Revised Policies to those defined in the NPPF (July 2021) with references, and the adopted London Plan (March 2021)

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1 Growth Policies:

- 1.1 The current Croydon Local Plan (2018) 'Growth' Policies, as defined in Table 6.4, DM10.1 to DM10.11 or DM34 to DM49 and DM36 to DM49 'purports' to describe "**Growth**" by either "*Redevelopment*" or "*Evolution*" by process of "*Regeneration*", but gives no definition of the acceptable *magnitude* of growth in terms of developments' '**Site Capacity**', the '*Local and future infrastructure*' or '*Public Transport Accessibility*' and therefore the Policy is '*unenforceable*' and '*undeliverable*' as it has no measurable methodology, is *imprecise*, *indeterminate* and *devoid* of any Policy definition other than guidance to "*seek to achieve*" a minimum height of 3 storeys at specific locations.
- 1.2 The current Policy fails to meet the guidance required in NPPF (2019-21) Section 3. Plan-making and specifically **NPPF para 16 d)** or **Para 35**, or, more importantly, the Statutory requirement to ensure '**Sustainable Developments**'. In fact, the Policy is quite "*meaningless*" and "*nugatory*" but subject to the "*professional*" prejudicial judgment of Case Officers without any objective justification. This has resulted in approvals of significant over-developments throughout the Southern Wards of the Borough.
- 1.3 The fundamental reason is that "**Focussed**", "**Moderate**" and "**Gentle**" **Intensification** or **densification** Policies have no defined magnitude or ranges appropriate for an Area Type or Setting. The definitions only contain the broad areas where these designations apply.
- 1.4 This has been exacerbated by the omission of the **London Plan 'Density Matrix'** which related growth within acceptable ranges of Housing and Residential Density, the local setting and the accessibility to public transport infrastructure (PTAL). However, Croydon

Planners have always argued that this should NOT be considered “mechanistically” (so they ignored the policy completely but had no alternative professional assessment policies to compensate and manage developments). To be enforceable, Policies need to be ‘specific’ and if challenged, need to have defined limits and preferably evaluated *mechanistically* in order to achieve a definitive resolution which can be enforced, and could withstand a legal challenge.

1.5 However, it is understood that the **Revised Croydon Local Plan**¹ omits Table 6.4 and replaces it with a modified version of Table 6.5 which is just a tick box guide to evolution (i.e., No defining parameters).

1.6 **Policy SP1.0C States:**

1.6.1 “There are residential areas where the characteristics and infrastructure provision have led to the identification of potential for sustainable housing growth and renewal.

a. Areas of **Focused Intensification** are areas where a step change of character to higher density forms of development around transport nodes and existing services will take place.

b. **Moderate Intensification** – are areas where density will be increased, whilst respecting existing character, in locations where access to local transport and services is good.

c. Evolution and **Gentle Densification** will be supported across all other residential areas.”

1.6.2 Paragraph 6.62B to E has been modified to include “**Moderate Intensification**” category and 6.62F to K includes “**Focussed Intensification**” category, but again, there is no definition or limitation of what is meant by “**Moderate**” or “**Focussed**” intensification or densification. Also, there is no specific definition of the magnitude of “**Gentle**” densification.

1.7 The Draft Revised Croydon Local Plan at Table 1.1 Croydon’s Planning Policy Framework indicates The **London Plan** has been an input to the production of the Revised Croydon Plan. The Draft Croydon Plan does NOT reference London Plan Policies of ‘*Chapter 3 - Design*’ (*The Design-Led Approach*), other than D9 (Tall Buildings) and D13 (Impact of Change).

1.8 **The London Plan**

1.8.1 The only reference to the **London Plan Design-Led Approach Policy** is at Paragraph **4.15** which states:

“The London Plan’s design led approach seeks to optimise the best use of land for delivering of high-quality homes. Good design of homes forms a basis for a good quality of life.”

But there is no further mention of the implementation or methodology of the “**Design-Led Approach**” or what it means.

1.8.2 Therefore, the main thrust of London Plan’s “**Design-Led Approach**”, “**Site Capacity limitations**” and “**Design Codes**” for Residential Developments have been completely disregarded in the Revised edition of the **Croydon Local Plan**.

¹ <https://www.croydon.gov.uk/sites/default/files/2022-01/croydon-local-plan-2018-revised-2021-part-1-start-to-section-11.pdf>

1.9 In addition, the Draft Revised Croydon Plan does **NOT** reference the **NPPF National Model Design Codes or Guidance²** as referenced from **NPPF para 129**.

1.10 Thus, there are still no Policies to actually **“manage” Growth** in the **Revised Croydon Local Plan**, the Main Function of **“Development Management”**.

2 London Plan (2021):

2.1 The **London Mayor** decided to omit the **Density Matrix** from the new London Plan (*the option to improve and update the Density Matrix was never considered*). The new **NPPF** and **London Plan** have incorporated a requirement for a **‘Design-Led-Approach’** with the introduction of **‘Local Design Codes’** to assist in the control and **‘management’** of developments according to the available **‘Site Capacity’** limitations and available supporting **infrastructure**. These Policies meet the objective of **Sustainable Developments³**.

2.2 London Plan Policy D3 Optimising **‘Site Capacity’** through the Design-Led Approach:

2.2.1 London Plan Policy D3 States:

*“**All** development must make the best use of land by following a Design-Led Approach that optimises the “capacity” of sites, including site allocations. Optimising ‘site capacity’ means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and ‘capacity for growth,’ and existing and planned supporting ‘infrastructure capacity’ (as set out in Policy D2 Infrastructure requirements for sustainable densities⁴), and that best delivers the requirements set out in Part D.”*

2.2.2 Policy D3 Para 3.3.2

“A design-led approach to optimising site capacity should be based on an “evaluation”⁵ of the site’s attributes, its surrounding context and its “capacity for growth” to determine the appropriate form of development for that site.”

2.2.3 Policy D3 Para 3.3.4

“Designating appropriate development capacities through site allocations enables boroughs to proactively optimise the capacity of strategic sites through a consultative design-led approach that allows for meaningful engagement and collaboration with local communities, organisations and businesses.”

2.2.4 Policy H2 Para 4.2.5.

“The small sites target represents a small amount of the potential for intensification in existing residential areas, particularly in Outer London, therefore, they should be treated as minimums. To proactively increase housing provision on small sites through ‘incremental’ development, Boroughs are encouraged to prepare area-wide housing “Design Codes,” in particular, for the following forms of development: Residential Conversions, Redevelopments, extensions of houses and/or ancillary residential buildings.

² <https://www.gov.uk/government/publications/national-model-design-code>

³ NPPF Section 2 Achieving sustainable development.

⁴ https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

⁵ Definition of **“evaluation”**: The making of a judgement about the **amount, number, or value** of something.

2.2.5 The issue is; there is NO definition of the magnitude of “**incremental**” or “**intensification**”, but a definition should be defined in the “**Design Code**” for a development site.

2.3 Numerical analysis and evaluation of parameters is the only feasible methodology which defines acceptability or otherwise of whether a proposal is within the limits of a **Site’s Capacity**. The evidence shows Planning Officers’ interpretations are in direct contradiction to the interpretation and objectives of London Plan Policy D3 which is to ensure developments are appropriate for the **Capacity of a proposed Development Site**.

3 **NPPF June 2021:**

3.1 The **Communities & Local Government** Department has published a series of documents and guidance on the production and definition of **Local Design Codes and Guidance**⁶ **Referenced from the NPPF (July 2021) at paras 128 & 129.**

3.2 **NPPF para 129 States:**

3.2.2 *“**Design guides** and codes can be prepared at an area-wide, neighbourhood or site-specific scale, and to carry weight in decision-making should be produced either as part of a plan or as supplementary planning documents. Landowners and developers may contribute to these exercises but may also choose to prepare **design codes** in support of a planning application for sites they wish to develop. Whoever prepares them, all guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area, taking into account the guidance contained in the **National Design Guide** and the **National Model Design Code**. **These national documents should be used to guide decisions on applications in the absence of locally produced design guides or design codes.**”*

4 **Analysis:**

4.1 The **Croydon LPA** gives the impression of not wishing to implement the new **London Plan “Design-Led Approach”** guidance or the **NPPF National Model Design Code** guidance with respect to ‘assessing’ each development proposal’s “**Site Capacity**” as defined in both the **NPPF National Model Design Code** guidance and the new **London Plan Design-Led Approach** for managing development proposals. The ‘Site Capacity’ requires an ‘assessment’ of the Site parameters, Local Design Code, Site Area, and the proposal’s physical dimensions in relation to the local setting, character and infrastructure availability (Public Transport Accessibility PTAL) for a genuine meaningful evaluation of the ‘Site Capacity.’ It is not feasibly possible to assess ‘Site Capacity’ without some form of methodology or mechanistic evaluation.

4.2 The **National Model Design Code & Guidance** includes the main character parameters, including Housing Density, Footprint to Site Area Ratios, Set-back building lines, heights and amenity areas, etc. It was first published in January 2021 and updated in June 2021. This was probably too late for the Policies to be incorporated into the March 2021 issue of the revised London Plan but should have provided adequate time for the policies to be included in the **Revised Croydon Local Plan** prior to consultation in Jan/Feb 2022. It is unacceptable to blame any delay on the Pandemic as the preparation could have been completed even if working from home.

⁶ <https://www.gov.uk/government/publications/national-model-design-code>

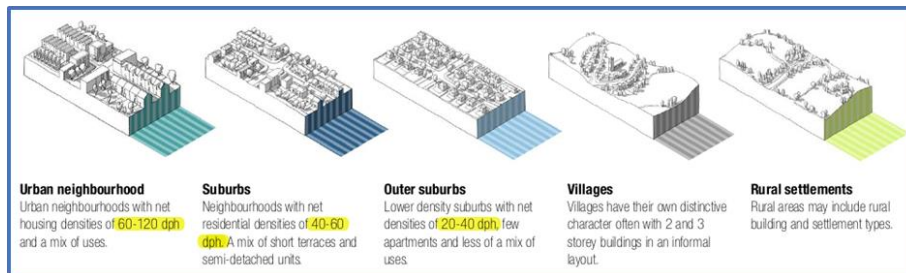
5 Densities:

5.1 The most important (*and contentious*) parameters relevant to overdevelopment are Housing and Residential Densities appropriate for the localities in order to “manage” development of a proposal within an available “Site Capacity”.

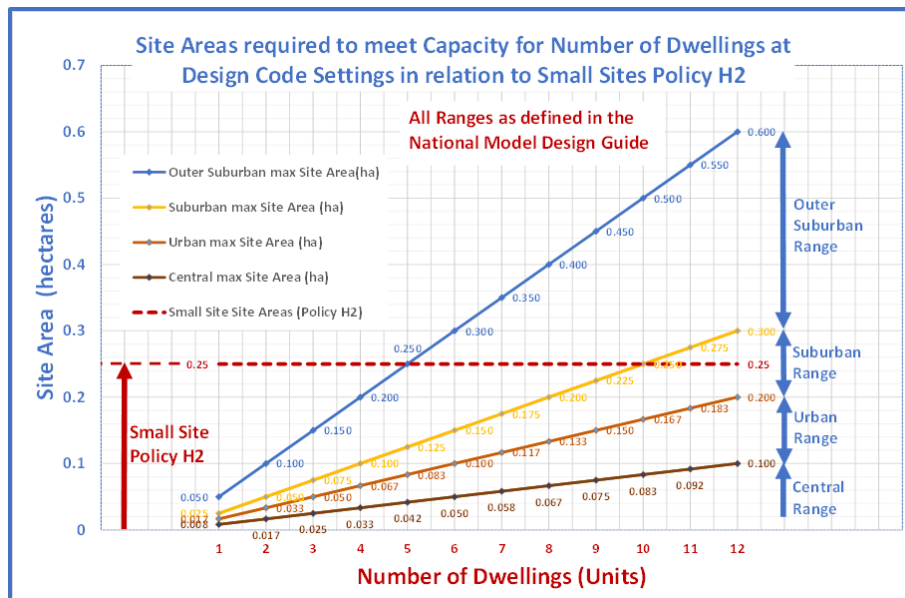
5.2 Housing Densities for Local Settings:

5.2.1 The important parameters defined in the **National Model Design Code**, Part 1, Section 2B Coding are the dwellings per hectare (*dph*) or units/ha for “Outer Suburban” or “Outer (London) Suburban” at **20 to 40 units/ha**, “Suburban” at **40 to 60 units/ha** and “Urban” at **60 to 120 units/ha** and the **Floor Area Ratio (FAR)** [GIA/Site Area in sq.m. ≤ 0.5 for Suburban Area Type Settings]. The Building, Parking, Refuse Storage etc., along with Amenity Area provision; and additionally for Flats – Communal and Play Space for children, all have to be within the ‘Site Capacity’ appropriate for the **Area Type and Setting** for ‘Sustainable’ Developments.

5.2.2 NPPF Model Design Code⁷ Part 1 The Coding Process Section 2B - Figure 10 page 14:



These illustrations, extracted from the National Model Design Code, Part 1, show the definitive’ Housing Density ranges for the various Settings (Highlighted).



Incremental Number of Dwellings Site Capacity for each Area Type Setting as defined by the National Model Design Code & Guidance

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009793/NMDC_Part_1_The_Coding_Process.pdf

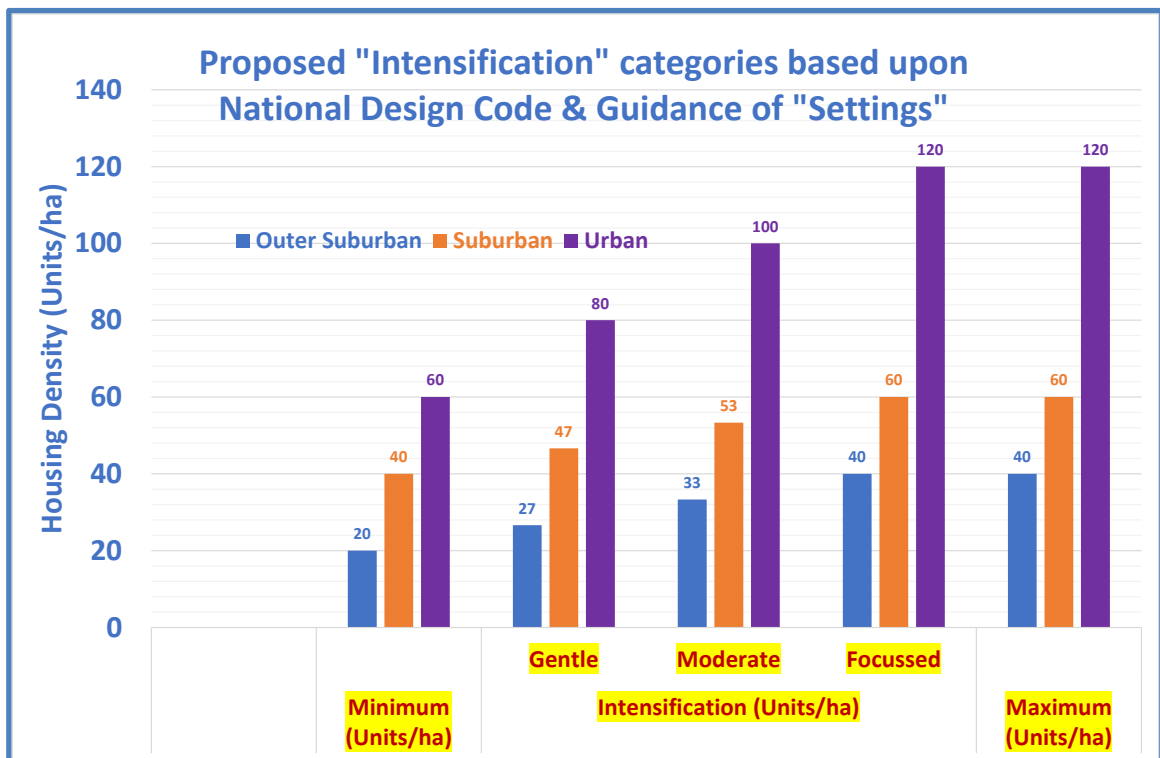
5.2.3 The Area Types or Settings defined in the National Model Design Code & Guidance are not recognised by Croydon LPA, but we need to ask why this should be the case as these are referenced from the **NPPF and are National Guidance**.

5.2.4 If Croydon LPA do not agree with these parameter definitions as explicitly defined in the NPPF Model Design Codes and Guidance, we need to know what their proposals are to replace them for Croydon. Additionally, they also need to justify: a) Why these definitions are disregarded, and b) Why Croydon area types are different from the National NPPF guidance?

5.3 Intensification and National Model Design Code & Guidance

5.3.1 As the **National Model Design Code** Area Types exist on the availability of supporting infrastructure, any intensification within an Area Type or Setting relies on that existing supporting infrastructure and therefore the **Design Code** “Intensification” Density should remain within the Setting or Area Type “Ranges” as defined (“Outer Suburban”, “Suburban”, “Urban” or “Central”) as, unless there is a definite planned increase, the infrastructure would **NOT** adequately support the intensification increase if exceeded and would therefore be **unsustainable**. It is suggested that poor infrastructure would require the **Design Code Density** to tend toward the lower value of Density of the ‘Setting Range’, and higher infrastructure provision tend toward the higher Density of the ‘Setting Range.’ Similarly, the Intensification or densification should follow the same principles for **“sustainability”** as follows:

5.3.2 Suggested Incremental “Intensification” Ranges”



Suggested ranges of for Gentle Moderate and Focussed intensification to remain within infrastructure limitations of the existing Setting and Area Type

5.3.3 I have shown an **incremental** increase in **Design Code Density** of $\frac{1}{3}$ & $\frac{2}{3}$ between Settings for “Outer Suburban”, “Suburban” and “Urban” for “Gentle”, “Moderate” and “Focussed” Intensification or “Densification”. The LPA could specify different incremental rates, but they should remain within the limits of the Setting range (min to max).

5.3.4 There is **NO** equivalent for “**Central**” Area Type setting, as there is NO defined maximum. The Maximum Density at “**Central**” Area Types or Settings is defined by the proposal’s requirement to meet the **Minimum Internal Space Standards** and **Private Amenity Standards**. This is our interpretation of Local Plan Policy as there is no meaningful guidance in the **Croydon Revised Local Plan** or the **London Plan**.

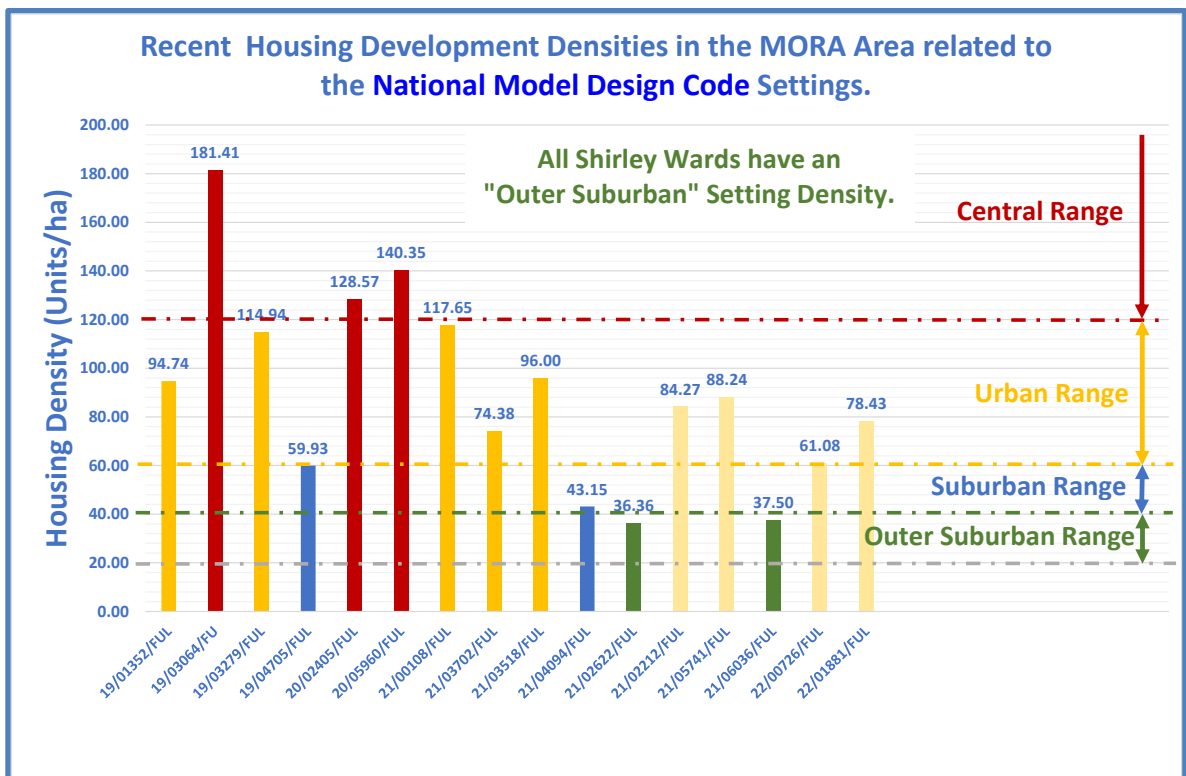
5.4 Assessment of Local Design Codes Area Type Settings (Shirley).

Location	Area (ha)	Population	Dwellings (Units)	Residential Density (bs/ha)	Housing Density (Units/ha)	"Setting" for Design Code Density
Shirley North Ward	327.90	15666	6555	47.78	19.99	<Outer Suburban
Shirley South Ward	387.30	14147	5919	36.53	15.28	<Outer Suburban
All Shirley	715.20	29814	12474	41.69	17.44	<Outer Suburban
MORA Area	178.26	9283	3884	52.07	21.79	Outer Suburban
Post Code CR0 8S(*)	16.95	627	237	36.99	13.98	<Outer Suburban
Post Code CR0 8T(*)	11.82	644	246	54.48	20.81	Outer Suburban
Post Code CR0 7PL	1.73	47	19	27.17	10.98	<Outer Suburban
Post Code CR0 7QD	1.51	68	28	45.03	18.54	<Outer Suburban
Shirley "Place" ¹ (approx)	770.00	?	?	?	?	?
Average	205.08	8787	3670	42.72	17.35	<Outer Suburban
All Shirley	715.20	29814	12474	41.69	17.44	<Outer Suburban
Shirley Place (Estimates)	770.00	33414	13981	43.39	18.16	<Outer Suburban

This Table shows the assessment of Design Code Densities for areas within Shirley

5.5 Planning Officer’s comprehension of “Intensification”

5.5.1 We have evidence over recent development approvals and validated submissions that Planning officers have **NO comprehension** of appropriate “Intensification” or “densification” or how to manage its implementation as shown in the following Graphical illustration.



Graphical Illustration of Validated Proposals (Approvals & Pending) showing the complete lack of any consistency of intensification in the MORA Area.

5.5.2 This lack of consistency and lax Policy implementation is a contributory factor to local residents' complete loss of confidence in the Planning Process and we highly recommend that the opportunity for re-evaluation of the Croydon Local Plan addresses these anomalies.



The second issue relates to the Setting of Targets

1 The deficiencies of the Croydon Place Targets definition

1.1 The 16 “Places” of Croydon (actually Table 3.1 list 17).

1.1.1 **3.29** Croydon is a borough made up of a series of varied and distinctive neighbourhoods and areas, which are referred to here as ‘Places’. Understanding and expressing the character and what makes each place special and different enables sensitive planning.

1.1.2 **3.30** The overarching strategy must make sense for the borough as a whole and celebrate and respect the characters of different parts of the borough whilst delivering the spatial vision. All Places will grow and change, to varying degrees, as a consequence of the strategy of welcoming sustainable development and growth of the suburbs, with renewal and regeneration.

1.1.3 **4.2** There is a need for over **41,580** new homes in Croydon by **2039** and evidence indicates that **approximately 40%** of these need to be larger homes.

1.1.4 These “Places” have no defined boundaries or defined Areas and therefore the allocation of Targets against the “Places” are indeterminate. The “Places” do NOT correspond to Wards.

1.1.5 All the data relating to Development Proposals are held on the Public Register under the heading of Wards rather than “Places”. The outturns against targets are therefore against Wards not “Places”

1.1.6 It is noted that Table 3.1 does **not** total the **GLA** Target of **41,580** over **16** (17) **Places** but totals **37,121**. If the ‘Croydon Opportunity Area*’ is removed, the total for the **16** (17) Places is **22,621** not the **GLA** required Target of **41,580**. So, something is still amiss on Table 3.1.



	Places	Target	% of Total
1	Addington	568	1.53%
2	Addiscombe	647	1.74%
3	Broad Green & Selhurst	587	1.58%
4	Coulsdon	2,160	5.82%
5	Croydon Opportunity Area *	14,500	39.06%
6	Crystal Palace & Upper Norwood	382	1.03%
7	Kenley & Old Coulsdon	725	1.95%
8	Norbury	225	0.61%
9	Purley	5,735	15.45%
10	Purley Way Transformation Area	7,515	20.24%
11	Sanderstead	885	2.38%
12	Selsdon	633	1.71%
13	Shirley	278	0.75%
14	South Croydon	474	1.28%
15	South Norwood & Woodside	331	0.89%
16	Thornton Heath	1,063	2.86%
17	Waddon	413	1.11%
	Total	37,121	100.00%

2 Example of monitoring targets.

2.1 Housing “need” has been apportioned amongst the London Boroughs by the **GLA** and the Target for Croydon has been assessed to be **41,580** Units over 20 years. The Croydon LPA has distributed that allocation of **41,580** or **(37,121)** housing “need” over the **16** (17) Places” of Croydon as defined in **Table 3.1** of the Revised Local Plan.

2.2 Housing Need

2.2.1 The allocation of housing **“need”** assessed for the **“Shirley Place”** over the period **2019 to 2039** is **278** (See Croydon Revised Local Plan⁸ 2021 **Table 3.1**). This equates to **≈14 dwellings per year**.

2.2.2 In relation to meeting this housing **“need”** we raised a Freedom of Information (FOI) request **Ref: 4250621** on **31st January 2022**. The FOI requested data on the **Outturn** of Developments since **2018** for the **Shirley “Place”** plus the **Area, Housing and Occupancy** of the **Shirley Place** for which our analysis of the response is as follows:

2.2.3 The FOI response indicated, the **Shirley “Place”** as defined in the Local Plan has an area of **approximately ≈770 ha** and comprises **Shirley North and Shirley South Wards** and therefore the FOI response suggests completions for **Shirley “Place”** can be calculated by adding the completion figures together for each **Shirley Ward**. **This is ‘NOT True’ as is described later.**

2.2.4 The FOI Response indicates:

- The Council does not hold the information we requested in a reportable format.
- The Council does not know the **exact Area** in hectares of any **“Place”**
- The Council does not hold the **Number of Dwellings per “Place.”**
- The Council does not hold the **Number of Persons per “Place”**

In fact, the “Places” have NO quantifiable data held against them whatsoever.

Shirley North				
	2018	2019	2020	2021 (partial)
Gross units	48	94	73	16
Net units	45	87	69	12
Shirley South				
	2018	2019	2020	2021 (partial)
Gross units	12	17	3	5
Net units	10	15	0	5
Shirley Place				
	2018	2019	2020	2021 (partial)
Gross units	60	111	76	21
Net units	55	102	69	17

2.2.5 An analysis of this limited information (FOI response) supports our assumption that completions are recorded but **NOT** against the **“Places”** of Croydon and no action is taken by the LPA as a result of those completions. In addition, the **“Shirley Place” Area does NOT** equate to the sum of the Shirley North & South Ward Areas. **There is therefore a need to Monitor Outturns against Targets.**

TARGET OUTTURNS (Estimates)							
Locality	Area (ha)	Dwellings	Population	Percentage of ALL Shirley	Units over 20 yrs (Estimate)	Per Year (Target)	Actual (Outturn/yr)
Shirley North Ward	327.90	6555	15666	45.85%	127	6	67
Shirley South Ward	387.30	5919	14147	54.15%	151	8	8
All Shirley	715.20	12474	29814	100.00%	258	13	75
Shirley "Place" (Approximately)	770.00	?	?	107.66%	278	14	?
MORA AREA	178.26	3884	9283	24.92%	69	3	36

Estimated Target Outturns for Shirley and the MORA Area of 178ha (24.92%) portion of All Shirley Ward Wards Area 715.20ha

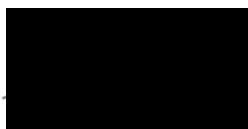
⁸ <https://www.croydon.gov.uk/sites/default/files/2022-01/croydon-local-plan-2018-revised-2021-part-1-start-to-section-11.pdf>

- 2.2.6 The analysis of the recorded data shows over the **‘three’ full years 2018 to end of 2020**, the **Net Increase** in Dwellings for Shirley = Shirley North Ward + Shirley South Ward = **55 + 102 + 69 = 226 ≈ 75** per yr. (However, this is **NOT The Shirley “Place”** at **≈770ha** but the net increase for the **Shirley North + Shirley South Wards Area of 715.2ha**).
- 2.2.7 The **MORA Area of 178.2ha** (which we monitor) is only **24.92%** of **All Shirley (715.2ha)**, however, at a rate of **36dpa** over the **20yr** period **≈720 dwellings**, developments would exceed the **Target for the Shirley “Place” of 278** by **442 Dwellings (for the Whole of the Shirley “Place”)** (**≈770ha FOI response**). This is $(720-278)/278 = 158.99\%$ Increase for the **Shirley “Place”** when the **MORA Area** is only $(770-178.2)/715.2 = 23.15\%$ of the area of the **estimated Shirley ‘Place’** and $(178.26-715.2)/715.2 = 24.92\%$ of all Shirley. **This is definitely NOT respecting the character of the locality when the locality is “Inappropriate for Incremental Intensification.” Shirley has Low PTAL and >800m from a Train/Tram Station or District Centre. There is also no proposed increase in supporting infrastructure. (See London Plan Policy H2 para 4.2.4.)**
- 2.2.8 The Build rate delivery of dwellings for **all Shirley** is averaging at **55 + 102 + 69 = 226 ≈ 75.33 dwellings per year (FOI)**, so over **20** years the **Net Increase** will be **≈ 1507 dwellings**. (Exceeding the **278 Target** for the **“Shirley Place”** by **≈1,229**).
- 2.2.9 The Target for the **Shirley “Place”** at **Table 3.1** of the **Revised Croydon Local Plan** indicates a Target of **278 dwellings over the period 2019 to 2039**. This rate would exceed the Target over 20 yrs. of **278** by: $(1507 - 278)/278 = 442.1\%$.
- 2.2.10 From the **FOI Request**, the Area of the **Shirley “Place”** is approximately **≈770ha**. The total Area of **Shirley North & South Wards** is **715.2ha** (GLA figures) therefore, there is **≈54.8ha** excess of land in other adjacent Wards which numerically means the **Target for Shirley Wards of 278** should be reduced by **7.12% = 258** (and the difference added to the Targets of the relevant **adjacent Wards**).
- 2.3 The above analysis would apply, to a certain extent, to all the **Places of Croydon** such that it is nigh impossible to accurately monitor compliance to the designated Targets attributed to the **“Places”** of Croydon. There is no mechanism for any adjustments if Targets are being exceeded, especially in localities designated for “Focussed” Intensification; or if Targets are not being Met. If the Housing “need” has been met in a “Place” designated for Intensification, **there is no pressure for continuing that Intensification.**
- 2.4 It is not understood why, after great expense, the Boundary Commission set the boundaries of Wards, that the Policy for Places did not coincide with Wards or groups of Wards. This would have allowed elected Councillors greater incentive to monitor developments and outturns against targets in their Wards and be more accountable to residents on Planning Issues. The LPA Public Register logs all Applications against Wards – NOT “Places.”

I hope you find this assessment and analysis helpful in your re-evaluation of the Croydon Local Plan.

Yours sincerely

Derek



Derek Ritson I.Eng. M.I.E.T.

Monks Orchard Residents' Association (MORA)

Executive Committee Member – Planning.

4th June 2022