

## **CR3 Forum**

### **Public Consultation for Draft Local Plan**

#### **Response to Tandridge District Council, December 2016**

##### **Introduction**

The CR3 Forum is the body preparing a Neighbourhood Plan for Caterham on the Hill, Caterham Valley, Chaldon and Whyteleafe on behalf of the four Parish Councils.

The Neighbourhood Plan aims to promote distinctive, vibrant and self-sufficient communities that ensure quality of life for everyone - without leaving a worse legacy for future generations. That is not easy to achieve in our part of north Tandridge. It is an attractive area where many people wish to live and work, within commuting distance of London. It has a population density eight times higher than the District average. The same land can be in demand for different purposes. In seeking a fair and sustainable balance between economic, social and environmental goals difficult choices will need to be made.

The Neighbourhood Plan aims to encourage and inform that debate. This consultation response has set out the main priorities for the CR3 area and compared how the Neighbourhood Plan and Local Plan address them.

##### **Economic objectives**

Economic sustainability means encouraging the innovative new commercial and retail enterprises that will attract investors and customers, provide local jobs and make our area more self-sufficient.

There are challenges to overcome. The Tandridge economy under-performs against a range of regional indicators. It has the lowest GDP in Surrey. Local job opportunities have fallen. In our area over 50 hectares of commercial employment space have been lost, mainly to residential development. This all encourages unsustainable dormitory suburbs.

There is certainly more that can be done. Public consultation for the Neighbourhood Plan indicates a strong desire to strengthen local business and jobs. We are well located within the prosperous south-east, with an educated and skilled population. The economic gravity of London and Gatwick is strong but (rather than commuting there) our business community is well placed to serve those major centres. The forthcoming Master Plan and Business Improvement District for the Caterham Valley and Hill centres are to be welcomed. Small independent shops and businesses in particular need a supportive economic environment.

The Neighbourhood Plan policies seek to encourage new high skill, high value technology-based enterprise: for example in the engineering, science, design, media, financial and professional services fields.. This means creating attractive modern premises that meet the requirements of the digital age.

To succeed, these initiatives need to be supported by a forward looking Local Plan. The present approach is based on retaining old industrial sites that have no room for expansion, or signing them over to residential if they are no longer viable.

The Local Plan, Sustainability Appraisal does include a strategic objective for supporting economic growth. It then considers development options for housing and employment sites. All nineteen potential sites in our area are rated positive for housing development. None are considered positive for achieving the Council's economic objectives.

The Sites Consultation document recognises that the Local Plan must identify ways to benefit the economy and prevent its decline by promoting local employment opportunities. It aims to support local businesses, attract inward investment so that the area can thrive and survive, and capitalise on our connections with London, Gatwick and the south-east. However there is no strategy to achieve this. Sites are only being considered for residential development. There is further loss of ex-employment sites: Kenley Airfield (CAT 004); East Surrey Waterworks, Stanstead Road (CAT 019) and Maybrook House, Godstone Road (CAT 041).

### **Social Objectives**

Social sustainability means providing a wide variety of high quality new homes that meet local needs and are affordable. They must minimise energy consumption and be well served by public infrastructure and services. To reduce the dominance of cars, public transport must be frequent and reliable. Communities will also be more self-sufficient through inclusive, locally based services in healthcare, sport, recreation, education and culture. The Neighbourhood Plan presents a range of policies to achieve these aims.

There are challenges to overcome. The TDC District housing target (2008) was for 2500 new dwellings over 20 years. Virtually the entire allocation (2454) was built in just 10 years (2003-2013) - the majority (49%) in our area, principally Caterham and Whyteleafe. Oxted and Warlingham contributed 14% and 10% of new homes. This imbalance has had inevitable consequences for built density, traffic congestion and public services of all kinds. The new Local Plan housing need has nearly quadrupled. Clearly our area cannot restore social sustainability if it continues to be over-developed in relation to the rest of the District.

The Neighbourhood Plan addresses this challenge through policies that reflect the priorities of local people. In public consultation protecting our green spaces came first. The Neighbourhood Plan therefore seeks to channel all development to brownfield land. The housing policies are less about absolute numbers and more about the type, mix, density and location of homes. A land supply that makes a reasonable and commensurate contribution to the housing needs of the District has been identified (without building on the Green Belt).

The main difference in the Local Plan is a focus to green sites instead of brownfield. Of the 17 sites in our area being considered for development, only 2 are brownfield (Sites Consultation document). The remainder are green spaces, predominantly Green Belt sites.

The Neighbourhood Plan recognises the public benefit of assets like parks, allotments and playgrounds. They serve a large population mostly in built up areas, where the number of

flats without gardens is increasing. The Neighbourhood Plan therefore seeks to safeguard public open spaces by designating them as Local Green Space. In contrast the Local Plan has considered developing most of them. Even in its latest form the Sites Consultation includes a public park (CAT 052) and community allotments (CAT 077).

Reflecting public comment, the Neighbourhood Plan also recognises that services of all kinds have not kept pace with the level of development. It presents policies that aim to retain, integrate and expand social provision to meet the demands of an increasing and changing population. They address power, telecommunications and water supply, noise, pollution, waste recycling, healthcare, education, community hubs, allotments, burial grounds, libraries, public parks, playgrounds, sports facilities, public transport and car parks.

The Local Plan includes two studies of public infrastructure covering Surrey and the Gatwick Diamond respectively. Over the Local Plan period, housing and economic growth in Tandridge results in a predicted £40 million funding shortfall. Across Surrey it is £3.2 billion.

In our area, the capacity of local services will be prominent in deciding whether or not sites are sustainable for development. However the Local Plan presents neither site-specific evidence nor an overall strategy. It states only that any development will need to take into account the delivery of roads, schools, healthcare etc. This is a major flaw in the site assessments, making the conclusions unreliable. The only suggested solution is encouraging investment in the area through house building which will generate the funding necessary and could attract financial subsidy from government (Sites Consultation document, 1.11). The problems in CR3 result from a long history of unplanned piecemeal development. They will not be solved by more of the same. A more forward looking approach is needed.

One particular aspect of overloaded infrastructure is the repeated flooding in Caterham and Whyteleafe. It has left many residents homeless and businesses ruined. The Neighbourhood Plan has utilities and design policies covering flood risk areas and sustainable drainage.

The Local Plan, Strategic Flood Risk Assessment (2015) described existing responsibilities and the remediation works carried out along the Caterham Bourne flood pathway. The 2016 supplement does not cover north Tandridge. The principal problem in our area is surface run off overwhelming the drains and flowing into valleys. Tandridge does not have a Surface Water Management Plan. Clearly there is more work to be done on the Local Plan.

The CR3 Forum will be working with local Flood Action Groups to seek a strategic approach between the various agencies. We need to both anticipate and mitigate flood risk more proactively. This priority has to be addressed through the planning system because the District Council takes the development decisions that generate infrastructure needs.

### **Environmental Objectives**

Environmental sustainability means conserving and enhancing the green spaces, views, wildlife and heritage that make our area a special place. They have strong community benefits in the most built up part of Tandridge supporting health, leisure, wellbeing and biodiversity. These fragile assets are all too easily overwhelmed by poorly thought out

piecemeal development. Restoring them, making the public realm more attractive and replacing eyesores with high quality design will help rejuvenate communities.

There are challenges, principally an ongoing loss of unprotected natural and historic environment assets. Design standards seem to be left to chance. Some new buildings complement the area, others quite the reverse. A strategic approach is needed.

To address these priorities, the Neighbourhood Plan puts forward policies covering green spaces, heritage and design. It aims to retain, conserve and enhance all green spaces, setting out clear criteria against which any development proposal should be judged.

In contrast the Local Plan has what is in essence a presumption in favour of developing green spaces. All sustainability criteria have been considered in the supporting technical assessments. Despite that, the overall Sites Consultation document puts forward potential development sites that are almost exclusively Green Belt and public open spaces.

The Local Plan reports are site-specific. They do not consider the wider collective value of the green spaces that surround and thread through our built up areas. Severing these green infrastructure chains would undermine the sustainability of the whole. A good example is the narrow corridor that separates the Caterham Hill and Valley settlements, linking the AONB to sites CAT 042, Queens Park, CAT 038, CAT 029, Manor Park and WHY 010.

The Site-based Ecology Assessments suggest that on some sites partial development could be off-set against biodiversity enhancement of ecologically sensitive areas. However the study assumes that this mitigation will happen automatically through the planning process. This is unrealistic at present. It would require a radical re-think whereby ecology became a primary factor in the development yield and design. Again there is more to be done on the Local Plan in bringing new priorities and new approaches to fruition.

## **Conclusion**

The Neighbourhood Plan puts local priorities first, but must operate within a structure set by the Local Planning Authority. Conversely, the new Local Plan must give adequate weight to the particular needs and challenges of our area. Until now the two draft Plans have been proceeding independently. Perhaps not surprisingly they differ in key respects.

Achieving a fair and sustainable balance between economic, social and environmental goals requires the emerging Neighbourhood Plan and Local Plan to be working in tandem. Each should operate within a common framework, consisting of agreed priorities and the policies to deliver them. The CR3 Forum wishes to engage in a constructive dialogue with the District Council in order to achieve that. It should be an integral part of the consultation process.