

Consultation Statement

Appendix F - Regulation 14 Consultation - April-July 2017

Tandridge District Council comments and response to CR3 Neighbourhood Plan

Reg 14 Consultation April-July 2017

This table contains a detail of the comments received from the Regulation 14 consultation that took place between April and July 2017. Against each comment, a response from the Steering Group is provided, suggesting how that comment will be addressed in the Plan making process.

COMMENTS	RESPONSE
<p>Tandridge District Council would like to take this opportunity to congratulate CR3 Forum on the amount of work and time that has taken to prepare the CR3 Neighbourhood Plan.</p> <p>Following a meeting held on 19 July 2017 with the Chairman of Tandridge District Council Planning Policy Committee, the Head of Strategic Planning Policy and the members of the CR3 Forum, it was decided that a summary of the meeting was to form the response to the CR3 Neighbourhood Plan.</p> <p>The meeting raised a number of concerns from both the District Council and CR3 Forum, these are set out below:</p> <p>1. The need to remove the policies that did not conform with the basic conditions, focussing on policies that relate to 'excluded development' – Policy U04 – Fracking and Policy U07 – Location of Waste Facilities;</p>	<p>1. Policy will be removed.</p>
<p>2. The consideration of policies that restate policies within the Core Strategy and Detailed Policies, and the need to make the policies more CR3 specific. These include policies GSHD05, HO01, HO02,</p>	<p>2. Noted. Policies and their Aim and Justification will be made more specific to the CR3 Area where</p>

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COMMENTS	RESPONSE
HO06, HO07, HO08, HO10, BE03, BE04, BE05, HE01-HE03, HE04-HE07, HE09, HE11, LC01, LC03 and LC05, For example, Policy U08 Flooding could include reference to how development can contribute to the flood risk from the Bourne and levels of flood risk within Caterham on the Hill.	possible and attention drawn to the local evidence base.
3. The consideration of conflicting policies, such as Policy CSHD02 and Policy LC08, Policy GSHD07 and other policies in the plan on flooding and water, Policy HO03 and other policies in the plan such as Policy HO02, LC02 with national policy in relation to identifying special circumstances for development in the Green Belt, Policy U01 with other policies in Utilities section.	3. Noted and Policies will be reviewed with this in mind.
4. The need to include the great work undertaken on the Local Character Areas and relate the policies to these Character Areas.	4. Noted but it is considered that there is sufficient detail within Group Reports. However it may be necessary to provide more detailed SPDs in relation to specified Character Areas.
5. To identify how the Local Green Spaces meet the Planning Policy Guidance.	5. Noted. Local Green Spaces will be reviewed and assessed against Planning Policy Guidance. The initial list and map is a draft based on submissions. Will also be reviewed on Land owner comments.
6. Consideration should be given to shorten the vision to capture a succinct framework for the plan.	6. Noted but not agreed. Will review.
7. To reference the policies that relate to the objectives, so that it is clear that the objectives are being met.	7. Noted. All policies will be reviewed to check that they meet the Aims and Justifications set out and overall NP Objectives.

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8. To set out criteria for the policies so that an application can be assessed against this local criteria.	8. Noted but not understood. Will discuss further with Planners at TDC.
9. To set out monitoring indicators to determine if the Plan is being effective and to provide a clear focus on whether the policies have targets they are aiming to meet, and to provide a framework for the authorities monitoring report that is prepared by the Council annually.	9. Noted. This should form part of the Monitoring Policy Section. Discussions are being held with Parish Councils on both the extent and content for Monitoring by both TDC and Parishes.
10. To understand that the policies reflect the consultations undertaken by CR3 and that the comments received by residents and businesses have helped shape the policies. However, that there is a need to identify where those policies met the basic conditions and other comments in this response. For policies that do not meet the basic conditions or are not land based, projects can be identified that the local community can help to deliver and set out in a separate section of the plan, such as aspiration LCA1.	10. Noted. Policies will be reviewed in this respect and where sensible altered to Aspirations.
11. The ability for the Council and consultants to help write the plan through providing constructive advice, and the need for advice to avoid legal challenge.	11. The Steering Group welcomes all advice and assistance that Council and Consultants can provide. Consultants from Locality, AECOM and Quod have advised in the preparation so far and it is hoped this will continue.
12. To continue to hold meetings with the CR3 Forum as they prepare the regulation 16 consultation and that they provide drafts of the plan at least one week from the meeting date so that the Council can review and comment.	12. The CR3 Steering Group has sought to hold regular meetings with TDC and hope that this is reciprocated in the future. It would assist if the chain of communication could be defined by TDC rather than dealing with individuals.

Comments	Response
<p>1. developers are not being realistic when showing the parking spaces at new developments. They are allowed to class the 'garage' as parking but the sizes of the garages are not realistic for most modern cars.</p>	<p>1. This is an item for GSHD section but does confirm a widely held view on parking within developments.</p>
<p>2. The NPPF states 'Local planning authorities should work with other authorities and providers to assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education and flood risk management'.</p>	<p>2. Agreed however it has been decided to combine HO02 with U01 to put all infrastructure within a single policy. Infrastructure is defined in Glossary.</p>
<p>3. With regard to the drainage system, in 1967, sewage pumping stations were closed (TDC) and the combined sewer serving Caterham on the Hill was connected to the old Coulsdon 9" original combined sewer, which is at maximum capacity. The Caterham Flood Action Group (CFAG) is working with the authorities on flood resilience, this work (and the considerable costs) should be taken into account when making planning decision that put additional strain on the infrastructure.</p>	<p>3. Flooding and drainage are important considerations for decision makers when considering planning applications. Now dealt with under U01</p>
<p>4. P44) Policy HO02, the CFAG would welcome a catchment wide planning policy, bearing in mind the nature of the catchment and the flood risk, we ask that ALL dwellings utilise SuD's.</p>	<p>4. Policy HO02 has now been deleted as advice suggests this is already covered in adopted local plan and that it would be overly onerous for developers to comply with HO02 as well.</p>

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	Flooding now dealt with under utilities and Policy U08.
5. P46) Back garden development is a real risk because if only one house etc it is difficult to monitor. Planning applications in 'flood risk areas' should demonstrate what they are doing to reduce flood risk. This would include permeable surfaces and Suds etc, the CFAG strongly advise against 'garden grabbing' in areas at risk of surface water flooding.	5. Noted.
6. P47) sub division. Waste removal is not considered planning material but must be taken into account when increasing the number of occupants considerably, is the drainage sufficient, Thames water are obliged to make connections regardless of the consequences downstream, this would not be a sustainable development if flood risk was increased downstream.	6. Noted
7. The housing report is nicely detailed highlighting the density per ward.	7. Noted
8. I suggest that it is important that the plan prioritises the infrastructure, and the associated costs, in terms of the need to provide protection from further flooding of this and other buildings in the area.	8. Note and the NP does acknowledge the importance of these issues.
9. Unfortunately trend of adding and adding more and more places without providing further local services put everything under strain. Which	9. Noted and considered a major constraint on future development in the CR3 area.

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<p>makes all of us frustrated when trying to see GP or getting a school place.</p>	
<p>10. Still the constant increase of houses put a strain on all amenities. I 100% agree with that. This constant development still continues Buxton Lane, Stanstead Road, Church Hill just a few as an example, but even in obviously overbuilt already roads off Croydon Road. Where provisions for parking are none. This constant development is affecting traffic in the whole of Caterham. Congestion on Clifton roundabout is horrific.</p>	<p>10. Noted and considered under Transport. However, this is primarily dealt with by Surrey CC and will only restrict development if there is a strong evidence base or safety concerns for problems of this nature.</p>
<p>11. I have spent a lot of time walking the Caterham Hill area and have realised that to build houses on the fields to the east of Roffes Lane and on the Heath Road allotments would destroy the delicate eco-system already under threat from development on Roffes Lane and on Chaldon Common Road. Also to witness the amount of rainwater flooding into the lowest point of Roffes Lane was quite unbelievable. Also the building of the Oak Hall Church centre will make traffic movement almost untenable. So with the loss of wildlife habitat and corridors and flooding problems, traffic congestion and general over-population, I request that no more development is needed.</p>	<p>11. Comments noted and largely covered by Site Assessments for development in this area. Again a strong evidence base is needed to restrict development.</p>
<p>12. Moving to Croydon Road, what more needs to be said, total overdevelopment along its whole length with more to come. Grid-lock on its way, Caterham and Chaldon are full.</p>	<p>12. Noted.</p>

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<p>13. Will Tandridge use the housing figures contained in the Neighbourhood Plan as an “Open Sesame” to push part of the 9400 new homes in the Local Plan straight into the CR3 postcode area?</p>	<p>13. HO01 has been changed to take into account TDC Preferred Strategy which should reduce the amount of housing required in the NP area once the emerging new Local Plan is approved. The commitment to a new garden village reduces the amount of housing required from CAT 1 and 2 settlements. However TDC do not provide figures down to ward level for delivery of housing need.</p>
<p>14. The table on page 34 of this draft, entitled “Available Brownfield sites for housing”, confused us as to the numbers of the housing potential, e.g. Ninehams Gardens (not NineHams by the way) 15 dwelling units. The Units column should be titled net new units to avoid confusion (Ninehams Gardens total new units 35 less demolished units 20 = net new units 15). Jenny Gaffney kindly clarified this for us.</p>	<p>14. Noted and in the final version the table will be made clearer.</p>
<p>15. A planning application for 59 units at CAT007 (75 originally under consideration by a developer, not 70 as suggested) has already been submitted and rejected at appeal.</p>	<p>15. Noted.</p>
<p>16. The table on page 35 finishes off with the addition of windfalls at 10% though there is no indication of how this has been calculated.</p>	<p>16. Windfalls are calculated as an additional percentage of the number of net new units identified. The evidence base for this is previous annual experience and the number of small sites within Site Assessments which are not included in totals.</p>
<p>17. The previous NP draft stated that the CR3 postcode had already taken more than 57% of the present TDC housing target for the period to 2026 from within an area which represents just 29% of the total urban area of Tandridge. On this basis, the CR3 postcode already substantially over-contributes to the number of new dwelling</p>	<p>17.– 19. Agreed. Statistics are always under review but these rarely change trend indications.</p>

<p>units and has densities in excess of Tandridge as a whole as the table on page 32 of the NP shows.</p>	
<p>18. The table on page 38 “Target Calculation based on Planning Guidance March 2014” assumes that past growth can be used as an indicator of future trends. However, Note 12 does admit that the increased population over the previous earlier period coincided with a sharp increase in new housing over that period.</p>	
<p>19. As the earlier period coincided with a sharp increase in new housing, it should not have been used as the basis for a forecast. As this note observes, in the same 10 year period prior to 2001 the increase was just 7%, suggesting that the 1% increase pa may be too high.</p> <p>While this may have been the best estimate at this time, it should be revisited before the final version of the NP is published.</p>	
<p>20. Brownfield sites in the CR3 postcode such as Kenley Airfield, Caterham Barracks and the old NHS land (including St. Lawrence Hospital) have all be used up.</p>	<p>20. Noted although there is a possibility of further development on Kenly Aerodrome.</p>
<p>21. Thus, given the lack of brownfield sites, it is not entirely clear where all the proposed 1240 dwellings based on the 2014 ONS estimates new dwellings in the first period of the NP (2015 – 2015) will be located. It is even less evident where land for the 1319 new dwellings proposed for the period 2025-2035 can be found. These are matters which should be addressed.</p>	<p>21. Noted and HO01 has been revised.</p>

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22. Infrastructure is the key issue when talking about managing increases in population in the CR3 postcode. Housing built this area since the mid-1990s has been constructed mostly without any significant upgrading of drains, medical practices, schools and roads.	22. Policy HO02 has now been deleted as advice suggests this is already covered in adopted local plan and that it would overly onerous for developers to comply with HO02 as well. Flooding and infrastructure are now dealt with under utilities and Policies U01 and U08.
23. The justification for Policy H002 is absolutely right when it notes that there has been wider and more intensive use of local facilities and infrastructure which are unlikely to be able to sustain further increased use without additional resources being put into facilities and infrastructure.	23. Policy HO02 has now been deleted as advice suggests this is already covered in adopted local plan and that it would overly onerous for developers to comply with HO01 as well. Infrastructure is now dealt with under U01.
24. Point 2 of the conclusions on page 41 correctly states that “all new development will need to be closely matched to infrastructure support and specific need.” The big issue is how this will be achieved, something which is not at all clear to residents.	24. Noted.
Parish Council comments	
<u>Woldingham PC</u> Housing Report and Policies	
25. We feel that this area is particularly misleading and has many references to CR3 without making it clear that the report does not cover Woldingham Parish. It is very unclear if the statistics are for the whole of CR3 or just the area covered by this draft NP.	25. Noted but the NP does on its opening page (7) provide a map naming the parishes which compromise the CR3 area and these are listed on pages 8 and 7.
26. Tillingdown Farm is listed as a brown field site but it is in the Parish of Woldingham and	26. Tillingdown Farm is partly in Caterham Valley and partly in Woldingham. The contribution of

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<p>must be excluded from your list as it is already covered by the Woldingham Neighbourhood Plan. The housing numbers potential of Tillingdown Farm must also be excluded from your figures.</p>	<p>net new units will be corrected to only show those new dwellings in Caterham</p>
<p><u>Caterham on the Hill PC</u></p>	
<p>27. HOO2 is very welcome. The PC considers this an essential policy; in practice, some technical parameters will be required, especially in respect of drainage and sewage. The link with Policy UO6, which is wholly supported, might be made more specific. Policy U15 adds to this very helpfully.</p>	<p>27. Noted</p>
<p>28. With the current welcome aspiration of the District Council to build new council homes, it is noted that the availability of land is the main constraint on the progress of this initiative. The NP may wish to consider the addition of a policy which encapsulates some presumptions about land in public/state ownership. The market value of the land often precludes development of publicly owned housing. The PC would support a presumption that land currently in public ownership should be ring-fenced for future publicly owned development.</p>	<p>28. Noted but this is a planning document for planning decision makers. Currently planning does normally require a sequential methodology for change of use for sites.</p>
<p><u>Caterham Valley</u></p> <p>HOUSING</p>	
<p>29. We believe that no housing development should take place in the Green Belt if suitable Brownfield sites are available. The Neighbourhood Plan housing numbers are located on Brownfield sites.</p>	<p>29. It is not possible to totally restrict development of Green Belt sites and the NP does not have the power to change the status of Green Belt land, this can only be done by Tandridge. Currently there is a TDC Green Belt</p>

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	<p>Review underway to establish changes to Green Belt boundaries where sites do not meet the purposes of Green Belt. The NP can only indicate its preference for brownfield sites but must not be restrictive to development in accordance with local and central government planning policies.</p>
<p>30. It is also vitally important that greater consideration is given to the style and type of housing ensuring that adequate parking facilities are provided with good quality amenity space. Parking with any developments needs to be of good quality and future car parking spaces must meet the TDC standard size as a minimum.</p>	<p>30. Noted but unless there is an evidence base for more restrictive car parking standards than those set out by TDC in their SPD parking , a policy in the NP will not be sustainable as it will be considered restrictive on new development.</p>
<p>31. To support any additional residential development, which should include affordable housing at TDC's maximum standards, there must be the right quality of parking in the town centre as well as the correct quantity.</p>	<p>31. Noted but as drawn the current policy requires TDC 34% to be provided. Any more than this would be considered restrictive.</p>
<p>32. With Policy HO08, we would suggest that the number of properties required before affordable housing is considered should be lower. The number should be set at 5.</p> <p>The policy should also include a proviso that any two adjacent development applications submitted by the same developer and / or it is reasonably assumed they will be delivered together under the threshold, should be considered as one development and therefore any requirement for affordable housing should be met.</p>	<p>32. Noted but this would be restrictive</p>
<p>33. It is also essential that we have shared ownership or low cost housing opportunities to encourage teachers into the area.</p>	<p>33. Noted and Policy HO04 attempts to deal with this concern</p>

<u>Chaldon PC</u>	
<p>34. HO01</p> <p>“Parish Councils will monitor annual housing delivery and supply in CR3 based on information at Parish Level from Tandridge District Council used to prepare their Annual Monitoring Report on Housing Policies within the Local Plan.”</p> <p>Can the CR3 forum please confirm what additional duties the Village Council will be accepting under this policy.</p>	<p>34. This will be considered and included in a new Monitoring section of the final draft Plan. Discussions are being held with PCs and TDC to establish how far and on what basis this will be achieved</p>
	<p>35. Noted and consideration of this within Housing and GGSHD is being reviewed.</p>
<p>36. HO04</p> <p>“Proposals that include a proportion of smaller one, two and three bedroom accommodation will be encouraged.”</p> <p>The council is concerned that the policy refers to “smaller” dwellings but no definition of this is provided. Could the plan possibly refer to industry standards which are published?</p>	<p>36. Noted. The present wording defines using number of bedrooms. Thus any housing above 3 bedrooms is not considered small.</p>
<p>37. HO07</p> <p>“There will be a presumption in favour of sub-division of large properties to create a mix of small one, two and three bedroom dwellings and efficient use of land.” As with HO04 the council are concerned that the term small may be ambiguous.</p>	<p>37. Noted. The present wording defines using number of bedrooms. Thus any housing above 3 bedrooms is not considered small.</p>
<p>38. HO08 - “On sites of greater than 0.4ha and developments with more than 10 dwelling units, 34% of dwellings must be affordable.”</p>	<p>38. Setting levels for affordable housing outside of the TDC Policies can only be achieved if there is a sustainable evidence base for being more restrictive.</p>

The Village Council believes that the NPPF places responsibility for setting the proportion of affordable housing with the Local Planning Authority. Can the CR3 forum please confirm that setting levels of affordable housing is within the gift of the Neighbourhood plan.

“Given the high level of demand and price for new housing in the CR3 area, developers must submit evidence based justification and risk analysis for applying a gross profit margin in excess of 15% of nett sales value when assessing viability.”

The Village Council is concerned that this policy is not suitable for a Neighbourhood Plan. The primary reason for this concern is that the council do not believe a Neighbourhood Plan should dictate the profit margin private companies can apply to a development. Furthermore, there is a concern that this policy could prejudice later discussions that Tandridge may have with the developer regarding Section 106 contributions and the like.

The council would also like to submit one further thing to the CR3 Forums considerations with regard to Affordable Housing. The council believe that there is an opportunity within the Neighbourhood Plan for the CR3 Forum to state a preference as to which type of affordable housing they believe would best suit the CR3 area, either:

- Social rented housing – Housing association

It is currently considered that due to the high demand for housing in the NP area, Developers should be asked to justify why 15% is not a reasonable level of gross profit margin on sales value. It is not a prohibition but does provide guidance and a baseline on what will normally be considered a viable profit margin.

It is suggested that for Parishes to define preferences for Affordable Housing would require a suitable evidence base. This has not been provided but could be an aspiration if all Parishes were in agreement.

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<ul style="list-style-type: none"> • Affordable rented – rented at no more than 80% of the market average • Intermediate housing – generally shared equity homes <p>The council believe that the CR3 area could benefit greatly from each of these types of affordable housing but each type brings its own benefits. The council would like the forum to consider if it is possible to ascertain which of these (or what mix of these) would benefit the CR3 area most and state any preference within the Plan.</p>	
<p><u>Whyteleafe</u></p>	
<p>No comments on Housing.</p>	<p>N/A</p>
<p>Professional and Site Owner consultation</p>	
<p><u>Berkeley Strategic Land Roffs Lane CR3NPCAT042</u></p>	
<p>40. In the first instance our clients note that the proposed plan period is 2015-2035, the housing requirement over the plan period on this basis alone should therefore be 2,406 dwellings. As a result the Forum have not identified sufficient sites to meet their housing requirement.</p>	<p>40. Noted. This is likely to be addressed in final NP but no figures were included in the last 10 year period due to the uncertainties of housing numbers arising from emerging Local Plan, difficulties of forecasting site 10 years in the future. It should be noted that Local Authorities are only required to show a 5 year sites plan. The Policy also allows for monitoring housing delivery and the allocation of additional sites arising to the 2026/35 period.</p>
<p>41 Our clients contend the actual OAHN compared to that set out within the Strategic Housing Market Assessment, dated 2015, is much higher than predicted.</p>	<p>41. Noted but one does have to work with the best available information and that being used within the emerging Local Plan. The OAN figures within the Housing Report and updated in the NP are based on census population growth in CR3</p>

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<p>HO01</p>	<p>area and these are in turn reconciled with SHMA using the proportional urban area for CR3 within TDC. TDC Policies do not provide a target number for individual parishes or even CAT1 settlements but the evidence base within the CR3 Report clearly shows that CR3 has previously provided in excess of a proportionate contribution and continues to do so in the period 2015/25. This also closely matches the identified CR3 OAN for the same period.</p> <p>The NP will be revised to deal with period 2026/35 under TDC Preferred Strategy.</p>
<p>42 It is plainly unsound to identify a housing figure which only covers half of the plan period, especially when there is no policy requirement to review the policy for the delivery of the remaining requirement between 2025 and 2035.</p>	<p>42. See answer 41 above. The Policy as drawn does provide for active monitoring and action for the last 10 years.</p>
<p>43 The proposed policy is therefore ambiguous and unclear in regard to how the Neighbourhood Plan Forum would respond to any additional allocations that will be included in the emerging Local Plan.</p>	<p>43. Noted but it is not possible to foresee the future. Work on the NP was started well before the emerging Local Plan which is unlikely to be available before the end of 2019. Government advice also requires the emerging Local Plan to take into consideration Policies approved for Neighbourhood Plans if the Plan is made.</p>
<p>44 In addition, the aim of this policy is, in part, to support the presumption against development in the Green Belt contained in the NPPF.....Our clients maintain that the NPPF provides a robust policy framework to achieve this, clearly stating that alterations to Green Belt boundaries can only be made through the Local Plan process and in exceptional circumstances.</p>	<p>44. Noted and this is the reason no green belt sites have been allocated in the NP. However Site Assessments have considered if “exceptional circumstances “ apply in their review of sites. In this respect and due to the supply identified, the NP does not consider housing need an exceptional circumstance.</p>

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<p>45 As currently drafted the NP fails to meet the basic conditions both in terms of general conformity with the Development Plan and also in terms of promoting sustainable development and conformity with National policy (paragraph 8(2) of Schedule 4B to the TCPA 1990). These are fundamental failings that need to be addressed before the draft NP can proceed any further and our clients would strongly advise that the Forum wait for the TDC emerging Local Plan to be further advanced to ensure a coordinated approach to housing delivery.</p>	<p>45. Comment noted but not agreed. The NP has been drawn up in consultation with TDC Planners and Committee members, complies fully with current Core Strategy and Development Plan. Given that the emerging Local Plan is still very much in the consultation stage and very unlikely to be completed before the end of 2019 it can only be considered as emerging and not made. TDC have responded to this latest Regulation 14 Consultation and their comments will be addressed in the final Plan.</p>
<p>HO03</p> <p>46 We would note that the need to repeat the presumption in favour of brownfield land throughout the document is unnecessary. It appears the Forum are solely seeking to provide a policy framework which is overly onerous to any future greenfield development that may come forward.....The intention to prioritise the re-use of previously developed land does not accord with the requirement of the National Planning Policy Framework. Paragraph 17 and 111 of the National Planning Policy Framework only encourage the effective use of previously developed land, it does not prioritise it. The need to repeat this requirement is unnecessary and should be removed.</p>	<p>46. The NP merely supports the presumption in favour of brownfield sites and does not prioritise it. This is supported by a sustainable evidence base in the preparation of Group Reports.</p>
<p>47 We would add that the Policy is too restrictive in that it does not set a framework in which development beyond that identified as brownfield development could come forward. This Policy repeats much of the requirement sets our under Policy GSHD 06.</p>	<p>47. Noted and consideration is being given to simplifying Policies and reducing the number where overlaps exist.</p>

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<p>HO08</p> <p>48 As previously noted by our client’s representations to the Regulation 14 consultation, it is entirely inappropriate for the Neighbourhood Plan to dictate developer profit margins.....This has the clear risk of preventing otherwise acceptable development from taking place and drive developers away from the CR3 area into other areas.</p>	<p>48. The Policy does not dictate developer profit margins but sets the baseline for these allowing developers to show why higher margins may be required. The evidence bases shows the high demand for homes in the CR3 area and the low risk of housing development in the area afforded by a sustainable demand if the right housing is built to meet local need.</p>
<p>49 Furthermore, Policy CSP4 of the Core Strategy already requires that 34% of development be affordable, as a result the need for this policy is questioned. It appears a clear repetition of existing Development Plan policy and where the Forum have sought to impose onerous circumstances to stifle development</p>	<p>49. The Policy makes clear that 34% must be affordable based on the evidence base for the lack of affordable housing in the CR3 area. The rest of the Policy sets out local requirements not contained in current District Policies.</p> <p>Given that the Policy is not restrictive and the history of development and developer interest in sites in and around CR3, it is not considered that it will stifle development.</p>
<p>50 In any case the emerging TDC Local Plan may seek to amend the actual provision of affordable housing sought. As a result the Forum’s current approach set out in the policy would serve to undermine the possible approach being taken in the emerging draft Local Plan, which is directly contradictory to the national policy advice set out in the NPPG (Paragraph: 074 Reference ID: 41-074-20140306 – third bullet refers).</p>	<p>50. Noted but based on present evidence the policy complies. The NP will provide a monitoring process whereby the NP can be updated if required.</p>
<p>Conformity</p> <p>51 In other words, both national planning policy and the Secretary of State’s guidance advise that neighbourhood plans have to be consistent with and not in conflict with the provision of housing</p>	<p>51. Noted and agreed. However the NP does not set out to restrict development beyond existing planning constraints. And through its evidence base seeks to justify housing delivery available within the CR3 area for the foreseeable future.</p>

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<p>to meet objectively assessed evidence of need. This is reinforced by PPG Paragraph: 069 Reference ID: 41-069-20140306 which specifies that neighbourhood plans must “not constrain the delivery of important national policy objectives”.</p>	<p>As Paragraph: 001 Reference ID: 41-001-20140306 also advises:</p> <p>“Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area.”</p> <p>This sets out what the CR3 NP is trying to achieve.</p>
<p>52 If the Neighbourhood Plan were to be made, subject to significant alterations being made in order to meet the basic conditions as outlined in this response, the Plan will in any event be replaced by the later development plan document.</p>	<p>52. Noted but it is equally likely that the new Local Plan will incorporate and support the CR3 NP given it has been prepared under the auspices of the TDC and its Planners.</p>
<p>53 The draft NP should be set aside and a new draft prepared alongside Tandridge’s own new-style Local Plan, in accordance with the advice in the NPPG.</p>	<p>53. We must agree to disagree.</p>
<p>54 The Neighbourhood Plan correctly confirms on page 39 that “our analysis indicates that the policies for housing provision within the Tandridge Core Strategy (Policy SCP2) fall short of meeting the objectively-assessed housing needs for the District. Against this context The NP has therefore consciously not been prepared in general conformity with the strategic policies contained in the Development Plan. This immediately fails one of the key basic conditions</p>	<p>54. Not agreed, the Plan does conform and actually exceeds the requirements of the present Core Strategy in respect of housing delivery.</p>

<p>(Paragraph 074 Reference ID: 41-074-20140306 of the NPPG refers).limited weight can be given to the current housing target for the District.” The NP has therefore consciously not been prepared in general conformity with the strategic policies contained in the Development Plan. This immediately fails one of the key basic conditions (Paragraph 074 Reference ID: 41-074-20140306 of the NPPG refers).</p>	
<p><u>Croudace Longsdon Way Caterham</u></p>	
<p>55 It is not clear how the average housing requirement of 102dpa (page 43) has been calculated and why this would only take effect after the Local Plan has been adopted in 2019. It is also unclear why the steering group will only review their delivery programme for years 2026-2033 when the updated housing requirement covers the Neighbourhood plan period from 2015-2033.</p>	<p>55. Average of 102 is derived from the totals of 1075 and 1027 including 10% and 5% windfalls respectively in the Table of Additional Housing Units on pages 34 and 35. It is not suggested that this runs from 2019 but covers the period 2015/25. The reference to 2019 is relation to when the emerging Local Plan may be completed..</p> <p>See answer 40 above in relation to period 2026/35. However it is intended to revise this aspect to accord with delivery under the TDC preferred strategy.</p>
<p>56 On the basis of the Neighbourhood Plan percentage housing need for the area an overall requirement of 2,720 dwellings across the plan period would be required. This is substantially higher than the current figure contained within policy HoO1.</p>	<p>56. Policy HO01 only dealt with delivery in period 2015/25 and this accorded with the required OAN delivery for this period. Delivery for the period 2026/35 was to be reviewed at a later date under the monitoring procedure. However this will be reviewed in final version.</p>
<p>57 It is acknowledged that brownfield sites have a role to play in providing suitable and deliverable housing allocations for the NP and emerging LP. However, a heavy reliance on sites</p>	<p>57. Noted.</p>

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<p>such as these will result in the loss of more employment sites and furthermore will provide more flatted developments which will not meet the current demand for family homes.</p>	
<p>58 However, the NP can identify preferred sites within the Green Belt that would be supported and influence emerging Local Plan policies. For example a preferred mix could be identified to ensure family homes rather than flats can be delivered on the site.</p>	<p>58. The NP is not able to change the status of Green Belt Sites this is the function of the Local Plan. However the Steering Group have carried out Site Assessments on Green Belt and Green Space Sites within the CR3 area and these have set out parameters for future development if Green Belt Status is revised. However the NP does not consider Housing need to be “an Exceptional Circumstance” for allowing development. This is primarily due to the availability of Brown field sites identified for period 2015/25.</p>
<p>59 Paragraph 16 of the NPPF requires NP's to be prepared positively. The current approach of the NP is to reject future growth based on past delivery. There needs to be an acceptance of the increase in housing need and the sustainable nature of the settlements within the NP area which can accommodate growth throughout the Plan period, in order to demonstrate that the Plan has been prepared positively.</p>	<p>59. This statement does not recognise the amount of housing development that has taken place in the CR3 area since 2001 or the identified supply for 2015/25. It is not agreed that policies are negative but realistic to the available future development potential given the development that has already taken place and the need to protect the character and amenities of the area. The NP demonstrates a proportional and identifiable supply for the period 2015/25 and suggests a mechanism for revising the NP for delivery in the period 2026/35.</p>
<p>60 Calculation of housing requirement should be simplified and should take into account the most up to date OAN which equates to 470dpa through the Local Plan period 2013-2033. If it is the aim of the NP to sit alongside the emerging Local Plan it will need to be prepared in</p>	<p>60. Noted but TDC do not provide delivery targets for individual parishes. The analysis with the NP and in Housing Group Report considers both TDC OAN and CR3 OAN and the proportionality of Housing supply by CR3. It uses the best available evidence at this time.</p>

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<p>accordance with these strategic policies. An acceptance of this updated housing requirement is therefore recommended.</p>	
<p>61 By focusing future development on existing brownfield land, will reduce available employment land that the NP seeks to protect. It is recommended that the NP acknowledges the potential benefit that Green Belt sites, released through the emerging Local Plan can bring.</p>	<p>61. Noted. However use of Green Belt sites is not considered to be the only method for meeting need. The present preferred strategy suggests only the inclusion of Green Belt sites that do not satisfy Green Belt uses. Currently very few GB sites in CR3 fall into this category and the CR3 assessments only identify one which might be suitable for development if its status as green belt was removed. Pending the completion of the TD Green Belt review it would be premature of the CR3 NP to allocate or suggest sites as suitable for development. However Site Assessments for Green Belt site have been done and these indicate the suitability of sites for future development.</p>
<p>62 If it is the intention of the NP to sit alongside the emerging Local Plan it is recommended that this preferred strategy is acknowledged and taken into account as it will affect development at Whyteleafe, Caterham on the Hill and Caterham Valley.</p>	<p>62. Noted, The NP is likely to be amended in its final version to take into account the preferred strategy by TDC for meeting housing need in the future.</p>
<p>63 Whilst it is acknowledged that the NP does not have the authority to release Green Belt sites, there is an opportunity to identify preferred sites and influence Local Plan site policies. This could involve, housing mix, open space requirements and landscaping proposals.</p> <p>Sigma Essendene Park</p>	<p>63. See Site Assessments.</p>

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<p>64. The 2017 Neighbourhood Plan assumes the continuation of the Green Belt designation of this site and therefore puts itself at risk of being inconsistent with the emerging Local Plan. In these circumstances the Neighbourhood Plan fails to meet the Basic Conditions and, unless modified, would not pass Examination.</p>	<p>64. Not agree. At present the Essendene Park site is in the Green Belt.</p>
<p>65 Representations in 2016 drawing attention to the frailty of the crude, unconventional and overtly localised methodology for identifying an OAN in the Neighbourhood Plan appear to have been rejected. However, this methodology is unlikely to survive Examination because it does not conform to Government Guidance in the PPG and is inconsistent with the Tandridge Local Plan. A conflict with the Basic Conditions is therefore the likely outcome.</p>	<p>65. Noted but not agreed.</p>
<p><u>Gladman Developments Ltd</u></p>	
<p>HO01</p> <p>66 This policy sets out what is considered to be an appropriate level of growth during the plan period. It is not considered that the current justifications for why this is considered appropriate are sufficient. The PPG states that where a neighbourhood plan is progressing before an up to date Local Plan is in place the local planning authority should be working collaboratively with the qualifying body sharing evidence about emerging housing needs. Before the plan progresses Gladman recommends that the CR3 Forum works with TDC to ensure the emerging need for the Parishes is known so as to ensure it can be met during the plan period without the need to review the CR3NP.</p>	<p>66. Noted but the Plan has been prepared in consultation with TDC local authority and Planners.</p>

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<p>HO06</p> <p>67 It is considered that paragraphs 2 and 3 of this policy should be deleted, it is not considered appropriate to be dictating levels of profit for a developer. Paragraph 173 of the Framework states that that ‘costs of any requirements likely to be applied to development, such as requirements for affordable housing... should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.’ In trying to limit a potential developer or landowners profit this is likely to lead to deliverability issues.</p>	<p>67. See previous response 49. Above. The figure of 15% of Sales Value equates closely to 20% on development costs used routinely in RICS and Developer appraisal valuation. It is also a base figure used by Banks in defining an acceptable return on cost for determining available funding.</p> <p>The Policy is not restrictive merely indicating a benchmark above which justification is required.</p> <p>Ref: Financial viability in planning</p> <p>RICS guidance note</p> <p>1st edition (GN 94/2012)</p>
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Business and Employment Reponses to Reg 14 Consultation April-July 2017

Summary of the key issues/ concerns	Review notes CR3 Response	CR3 Planning Policy Areas
<p>1. No more commercial development</p>	<p>1. Retention of facilities for employment and the local economy to be maintained so far as possible, to ensure that the town is attractive to residents and business.</p>	<p>Balanced Residential & Employment = NPPF. CR3 Business & Employment “Introduction”.</p> <p>Specific. BE01</p>

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2. More business needed	2. The plan seeks to encourage new start-ups whether as mobile, home based, live/work units, shared hubs, or individual premises. A new enterprise park is also a strategic objective, either in existing commercial space or other suitable land.	Balanced Residential & Employment = NPPF. CR3 Business & Employment “Introduction” Specific. BE02/BE03
3. Encourage development of office space in CR3	3. See above, subject to demand/needs	As above Specific. BE01/BE03
4. Bespoke shops	4. To be encouraged, via Masterplan, Town Design Statement & BID	As above Specific. BE01/BE03
5. Encourage new business	5. See above	As above Specific. BE01/BE02/BE03/BE04
6. Current commercial stock is outdated and does not encourage business demand	6. Regenerate existing spaces and consider a new Enterprise location.	As above. Specific. BE02/BE03/BE04
7. CR3 loses employment opportunities and there is a risk that the area becomes a dormitory town	7. A core concern, due to permitted development rights. The central area ‘s town Masterplan needs to balance, retail, residential and business. Outside the town centres, other mixed urban/rural locations are vulnerable to increasing residential demand. This must be balanced with the area’s need for employment.	As above. Specific. BE01/BE02/BE03/BE04/BE05

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8. Significant commercial spaces must be protected	8. Yes, see above. Should a more specific test be proposed similar to the affordable housing ratio e.g. 40% on significant size development? For example, brownfield site development will have a general presumption in favour of continued use. Proposals for active employment sites must demonstrate that overall there is no employment loss locally. Availability of alternative sites or premises on broadly similar terms, where businesses seek to continue to operate, should be provided in mitigation.	As above. Specific. BE01/BE02/BE03/BE04/BE05
9. Self sufficient parking for new businesses	9. Evidence Base required to support any change from TDC Parking Standards.	This is a gap we need to close. Being addressed through a single Parking Policy
10. Encourages conversion of business to residential if commercial is not feasible	10. Generally yes, or seek new sustainable business in modern sectors. PD rights achieve this, provided the brownfield site is not sustainable for the existing use or user.	PD rights achieve this, provided the brownfield site is not sustainable for the existing use or user, or identified for another commercial use.
11. Support the need to regenerate Caterham Town Centre with a good mixed economy. Central to this is	11. Agree. Masterplan, Town Design Statement and overall	As above. Specific. BE03 & BE04

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<p>the need to provide adequate parking. Caterham does not have a 24 hour car park</p>	<p>business policies intended to support this.</p>	
<p>12. Issue of concern is the inclusion of a Business Park within the NP. There has been no indication of location and we consider that this would also have a negative bearing on the CR3 area i.e. traffic congestion and air pollution.</p>	<p>12. Any business park is intended to be for sustainable modern sectors, e.g. those involved with Internet, communications, technology, creative media, professional services or education- which are growth sectors. Only sites with good road/rail and comms access to be considered such as existing commercial use, or other suitable land e.g. Contaminated.</p>	<p>As above Specific. BE03 & BE04</p>
<p>13. Stop to the loss of commercial (employment) space particularly where we wish to maintain mixed use in and around the village centre (BE06 and E02 refer)</p>	<p>13. See above. The reference to Village is taken to mean Caterham Hill particularly. However, it also applies to other locations around the CR3 Area, including parts of Caterham Valley, Whyteleafe and the various local shopping parades in CR3.</p>	<p>Specific/ BE05 (was BE06)</p>
<p>14. Prevent the net loss of car parking spaces in the centre of Whyteleafe (BE06 refers)</p>	<p>14. Agreed. See 9.</p>	<p>Matter also covered by consultations by Tandridge for Local Plan.</p>
<p>15. Increased parking and public transport, development of a</p>	<p>15. Yes and see above. Any locations to be considered with great care. Transport and parking</p>	<p>As above</p>

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Business/Technology/Science Park in the area as long as it does not create more problems with parking	considered elsewhere in the CR3 Forum Neighbourhood Plan, Caterham Town Design Statement and Masterplan.	Specific. BE03 & BE04
16. The decline in local employment in favour of housing expansion is a significant trend here and in many commuter towns and suburbs	16. Agree	Introduction section and evidence supports this statement.
17. If we could attract interesting and well paid jobs locally, that would boost a lot of household incomes considerably, make the community more equal,	17. Agree. See above	Introduction section and evidence supports this statement. Specific. BE02/BE03/BE04
18. Revitalising our retail offer would be a good way of doing this,	18. Agree. Also see Masterplan, Town Design Statement and BID	As above Specific. BE04
19. Business centre has been suggested in the draft plan but I think it would be good also to have tangible help such as consultancy, a venture fund, bank support etc	19. Excellent ideas and will be considered for action plans, if NP is passed.	Develop these ideas further as part of action plan, whether for start-ups, Business & Technology park, or Town Centre regeneration.
20. I think it's a shame the Rose and Young site is going to be a hotel and retail	20. Planning consents given for a hotel/ ground floor Beefeater plus another large retail unit via	A key site. CPO enquiry/action imminent.

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<p>rather than an office. Currently it may be that companies don't want to relocate to Caterham but it may be that the coming Thameslink service would change that</p>	<p>CPO, and mixed residential and retail by owned. Planning enquiry to review.</p> <p>Thameslink upgrade shelved for the time being, however if Masterplan succeeds that may enhance chances, especially if parking and mixed business/residential use of Town Centre boosted.</p>	<p>Masterplan has opportunity to enhance the attractiveness of Caterham for Business, Retail, Services AND Residents.</p>
<p>21. The decline in local employment in favour of housing expansion is a significant trend here and in many commuter towns and suburbs. I'm against it for what I think is an interesting reason. A year or two ago, Tandridge got a lot of publicity in the national media because it turns out to be the district with the highest proportion of women of working age who choose not to work and are not claiming benefits, resulting in stereotypes in the media about Stepford Wives. If an area is within commuting distance of great jobs in London, is an attractive place to bring up kids but has a rubbish local employment market, then one person may well commute to the capital (or Gatwick or points around the M25) while the other ends up not doing</p>	<p>21. An interesting comment. Broadly the Neighbourhood Plan supports rebalancing the local economy by growing and attracting start ups and other small and Medium sized businesses (SME's)</p> <p>The major reason for this strategy is to reduce the dependency on commuting to London and other centres, instead of local jobs. The trend contributes to parking issues and congestion near stations, peak hour traffic and poor footfall during the day affecting the retail and other business, from either sex, although the statistics support the comment in terms of balance between them.</p> <p>In the end if we can increase higher value jobs for both sexes</p>	<p>See left and above.</p> <p>Specific. BE01, BE02, BE03, BE04 & BE05</p>

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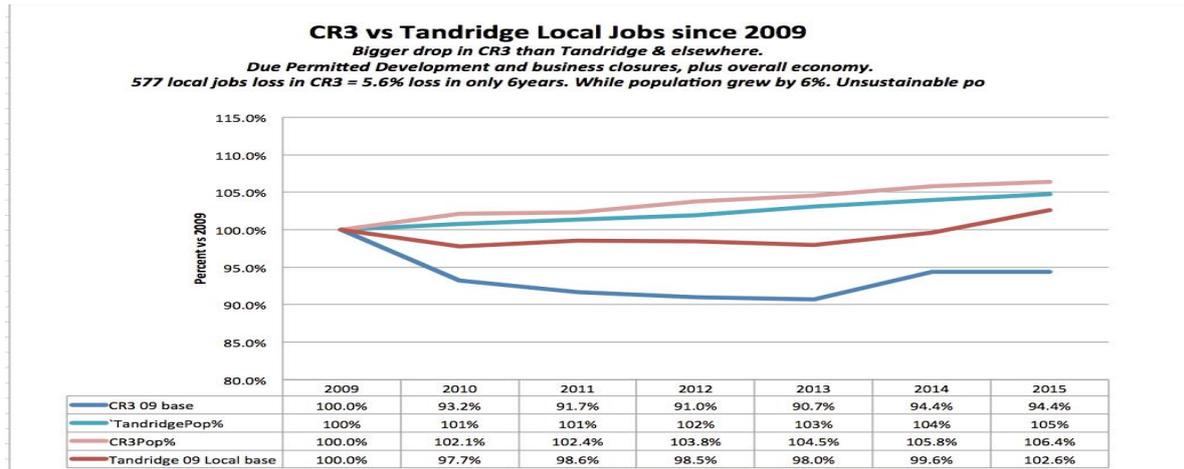
<p>much because childcare concerns make it difficult for that person (usually a woman, but not always) to commute and the local jobs barely cover childcare costs. If we could attract interesting and well paid jobs locally, that would boost a lot of household incomes considerably, make the community more equal, and also drive house prices because currently a lot of couples who want to retain two good careers when they have kids wouldn't consider Caterham but instead stay in London, where house prices are so much higher</p>	<p>locally that would be a significant benefit.</p>	
<p>22. Another is encouraging entrepreneurship. A business centre has been suggested in the draft plan but I think it would be good also to have tangible help such as consultancy, a venture fund, bank support etc, because we already have serviced office capacity (not least Dick's white elephant), plus Bourne House by Whyteleafe South station, so the problem is not primarily about office space</p>	<p>22. Similar comment to 19.</p> <p>Three shared office facilities have been closed or threatened with closure not because of lack of tenants but the profit from residential conversion. These include Orbital House, Bronze Oak & Croudace's Maybrook House.</p> <p>Quadrant House has units vacant but leases discourage tenants. What we have is a shortage and</p>	<p>See left and above.</p> <p>Develop these ideas further as part of action plan, whether for start-ups, Business & Technology park, or Town Centre regeneration.</p>

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	<p>the wrong sorts of units. The NP seeks to rebalance this.</p> <p>“Other” services are an excellent idea</p>	
<p>23. On business/employment opportunities, I was interested to read the section on support for a business/enterprise park. This sounds good. But it wasn't clear to me (sorry if I missed this) where this could be located. That seems a key requirement. Without a site identified, there seems little prospect of being able to get support from those bodies that hold the key to the necessary funding and other support.</p>	<p>23. There are several sites that could be suitable, however the point made is well taken.</p> <p>We seek land and property owners, plus other's who may be interested in the transition of existing brownfield commercial sites or contaminated, or flood risk sites to make contact.</p>	<p>See left and above</p> <p>Specific. BE02, BE03, BE04 & BE05</p>
<p>24. While the CR3 plan has a limitation on the numbers of units I would question some of the preferred sites. If the Texaco garage goes, there will be constant congestion at the other garage, this is already busy and we will lose a local facility in terms of car maintenance all while we are adding to the population and the number of cars. If the recycling facility goes, will Surrey County Council actually provide a new facility or will we</p>	<p>24. Commercial sites – Texaco- list of sites. Point re increasing dependency on a single petrol station noted.</p> <p>Recycling Centre. Current Surrey Consultation. Similar potential dependency on fewer sites locally and an impact on congestion noted.</p> <p>Both sites provide local employment as well as a service to residents and business. They are part of the area's facilities and infrastructure that we</p>	<p>Overall policy (BE01) seeks to protect key sites, especially active employment ones. Against this the government has introduced PD rights, which have been used to gain residential conversion. Where there are sound arguments to retail a service or site, we anticipate the Neighbourhood Plan will provide resistance over and above the current status quo, however we cannot block all sites and local comment at the time of any planning</p>

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<p>find ourselves having to travel to Earlswood as we do now if you have a bag of soil or stones from the garden. The more facilities that go locally will only increase traffic in an already congested area.</p>	<p>seek to maintain and improve – within the bounds of economic sustainability.</p>	<p>application will continue to be vital.</p>
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Transport Group Response to Comments 2017 Regulation 14 Consultation

Transport SoC 2017

From a review of the Comments from the 2017 Reg 14 consultation:

The Statutory Consultees, Highways England, also TfL have a comment, they both replied. Their comment is that they are both concerned with strategic level matters it would seem.

Otherwise a small number of residents comment on traffic and parking in amongst other topics. Some of the most apparent comments are from those on the new developments on the old St Lawrence’s hospital estate where they drive children to school at St John’s in the Valley.

The roads would be congested if that many cars seek to make that journey all at the same time. More local schools in walking distance would address this. Of course sites would have to be found. De Stafford do well as a school with a good proportion of children walking to school.

Parking is always an observation. Never convenient enough is it?

In the light of these comments no changes to the Transport policies have been made as these topics are already addressed and these comments serve to support those in place.

Leisure and Community Group Response to 2017 Regulation 14 Consultation

Responses to TDC comments

LC1 Allotments - they asked for further justification and we stated that all the extra justification was in Appendix LC 1 on the webforum. Legal details were checked.

LC2 Burials - TDC asked for all references to crematoria to be removed. They were removed.

LC3 Churches - TDC said DP 18 covered this. We felt that as we had lost some churches to residential development we should maintain this policy as a safeguard. It was retained.

LC4 Community Hubs - TDC noticed that a map was referred to but not present. This has been reinserted.

LC5 Community Assets for the Future - TDC felt this was unnecessary as a policy. It was removed.

LC6 Libraries - TDC felt DP18 covered this. On reviewing DP18 it was felt that this needed to be retained.

LC7 Footpaths - TDC felt this was already covered elsewhere. It was removed and covered by Transport.

LC8 Open Spaces - TDC felt this was covered elsewhere. It was removed and covered by Green Spaces.

LC9 Parking in Open Spaces - TDC felt this was covered elsewhere. It was removed and incorporated into Transport and Open Spaces.

LC10 Public Toilets - TDC felt this should be removed as it would be covered by various local authority legislation. It was removed.

LC11 Tourism - TDC asked for clarification of "improved signage and increased advertising". This was done to clarify the policy.

LC 12 Public Houses - TDC asked for clarification of the wording. This was done.

LC13 School Facilities - TDC felt this was already covered. This was checked with Education and removed.

LC14 Sports Facilities - TDC agreed and retained.

Aspirations.

LCA 1 Older Population - TDC felt this was not viable. This was removed and the wording of the policy LC4 was increased to cover it.

LCA 2 Litterbins - As above. Removed.

LCA 3 - Information Sharing - As above. Removed.

LCA 4 Swimming Baths - As above. Removed.

LCA 5 Youth provision - This was felt to be unnecessary and unattainable and removed.

LCA 6 Burial Ground - TDC agreed and retained.

This means L&C section now has 8 Policies and 1 Aspiration.

Comments on Community Hub - Soper Hall - asked that this Hall be described as being a successful hub for Caterham Valley. As this is a work in progress, wording has been altered to accommodate this by saying " The continued development of the Soper Hall as a centre for Caterham Valley will be supported".