

TDC Local Plan Review - Detailed Response **by Caterham on the Hill Parish Council** 28th January 2016

TDC Link:

<http://www.tandridge.gov.uk/Planning/planningpolicy/emergingpolicy/localplan.htm>

>>> These notes aim to assist Caterham on the Hill Parish Council (CoTH PC) in preparing its response to the TDC public consultation on its Local Plan Review ending on 26th February 2016.

This report relates to documents recently published by Tandridge District Council (TDC), mainly in December 2015. The report deals only with issues which have direct implications for Caterham on the Hill (CoTH). The documents raise numerous wider issues, but these have not generally been examined in this report.

PC comment: TDC officers have carried out a very considerable amount of work over a short period of time in order to bring forward a series of major review documents. In this context, it is unsurprising that some of the documents contain errors and inaccuracies. There is a need to correct and update the documents, unless this has already been done.

Throughout, Caterham on the Hill is preferred, rather than Caterham-on-the-Hill.

Our Local Plan: Issues and Approaches (77 pages)

TDC Link: Open Link as above and click on [Local Plan for Tandridge](#)

This is one of the main documents relating to this stage of the Local Plan Review and it forms the basis for the public consultation. TDC claims (on p2) that the present stage of the review does not change Green Belt (GB) boundaries, allocate sites or "deliver the strategy". However, the current documents contain numerous statements and assumptions which - if accepted - would lead to changes to the GB and to development land allocations over the Plan period up to 2033.

Strategic Context (p9): This very brief section is a series of bullet points.

Caterham and Oxted are listed as the main retail centres in the District. Redhill, Crawley and Sevenoaks "offer a wider choice of shops and services for Tandridge residents", but there is no mention of Croydon or central London as retail locations (although Croydon is mentioned on a later page). The railway section refers to "the north to south line" (presumably the Oxted line) and "the Reading to Tonbridge line, via Redhill". There is no reference to the Caterham Branch. The aviation section implies that Kenley Airfield is an active aviation airfield.

PC comment: This section should be corrected and expanded to give a fuller picture of the context within which the Local Plan Review is being carried out.

Issues (from p11):

>>> ***This section could usefully be read in full by PCllrs before the PC finalises its response.***

Housing Issues (p12): The six housing issues include: "Concentration of elderly accommodation, particularly in Caterham".

Infrastructure (pp20-22): This is by far the longest list of issues. However, there is no mention among the 18 infrastructure issues of several which affect CotH, including overcrowding and lack of capacity for car parking in many residential streets, traffic congestion and lack of road capacity (at many times of the week, not just in rush hours), and conflict between through traffic and local users. Lack of school capacity is mentioned.

Responses (pp 24-26): This section is much shorter than the list of issues, and no responses are proposed for some of the issues. For example, for the list of 18 infrastructure issues, only two responses are suggested.

Vision, how the district will look in 20 years (p28): This half-page section is extremely brief.

PC comments: The **Issues** section omits some infrastructure issues of concern to residents and businesses in Caterham on the Hill. There are a number of individual issues within the various lists which could be more clearly worded. The **Responses** sections are brief, bland and inadequate. The **Vision** section is extremely vague, and some of its aspirations are in conflict with the proposed housing land commitments later in the report.

How could we achieve our vision? (pp30-66): This is the main section of this document. The text implies that the Local Plan Review is not really about "our vision", but mainly about meeting Government requirements for housing and other development while attempting to limit damage to the district's communities and environment. The "things to note" bullet points on p30 (all in capital letters!) make this clear.

Within this section, sub-section 11, headed **the people** (pp31-45), states in para 11.0.1 (p31): "Chapter 6 of the NPPF requires local planning authorities to meet their full objectively assessed needs and to cater for those housing and economic needs." However, the NPPF actually adds an important caveat which is omitted from the TDC statement. The wording in the NPPF (para 47) states that LAs should "use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, **as far as is consistent with the policies set out in this Framework ...**" (our emphasis). There are numerous NPPF policies which provide a balance to unconstrained development, including protection of the Green Belt, safeguarding and enhancing the environment, providing access to leisure and recreation, improving infrastructure and many more.

PC comment: Paragraph 11.0.1 should be corrected to include the important caveat in the NPPF.

The TDC report sets out seven approaches to development in the district. The starting point is a settlement hierarchy; Caterham on the Hill is listed in the top tier as an Urban Settlement, separately from Caterham Valley.

For **housing provision**, the report next sets out a Delivery Strategy (pp32-40) based on a series of (mainly) cumulative "Approaches". Approach 1 covers dwellings already built and existing commitments. Approach 2a adds sites in main towns including CotH. Approach 2b suggests a higher density of build (at 70 dwellings per hectare, at least double what is currently achieved). Approach 3 adds Green Belt sites around urban areas. Approach 4 includes GB sites around rural villages instead of those around towns. Approach 5 includes GB sites around both towns and villages. Approach 6 is different and includes "a large urban extension or new settlement", but without stating a location or yield.

Approaches 1 - 5 include dwelling numbers (for the years 2013-33) and employment areas (in hectares), so this Review seems to be more about meeting Government requirements rather than providing improvements for existing residents and businesses. As a further complexity, these are provided for a series of between 16 and 53 Clusters across the District. Although the Clusters are shown on maps, it has not been possible to identify their precise locations, or in some cases whether a particular Cluster lies wholly or partly within CotH Parish. The PC has therefore compiled figures for dwelling numbers which the report assesses as deliverable or developable within or bordering CotH Parish, using the sites listed in the HELAA report, Appendix 3 (see below for details). The table below gives the results.

Table: Sites which HELAA Appendix 3 regards as 'deliverable' or 'developable', excluding sites already built or committed (see Approach 5, page 39 of Issues & Approaches Report)

<i>Sites in CotH Parish, not in Green Belt</i>	<i>Sites in Parish, within GB</i>	<i>Sites bordering Parish, not in GB</i>	<i>Sites bordering Parish, within GB</i>	<i>Total dwellings in and bordering Parish</i>	<i>Comparable total for Tandridge District</i>
275	134	92	1395	1896	8597

Notes: The above numbers represent the best estimate which the PC can make, in the absence of clear locational data from the Cluster figures in the report. We have used the dwelling yield numbers in HELAA Appx 3 even where they differ from other sources.

PC comments: The Parish Council considers that the use of Clusters in this report is unhelpful. We recommend that the break-down of housing and employment figures should use identifiable areas, either shown clearly on maps or related to Parish areas or Electoral Wards. We are also concerned that, on these maps, Kenley is shown south of Whyteleafe and within Tandridge District. This is incorrect; the place-name Kenley should be removed from the maps or correctly located outside the District. It would also be helpful to show Caterham Valley and Caterham on the Hill separately, particularly on larger versions of the maps.

From the table above, we conclude that, while the 'deliverable' or 'developable' housing site figures within the Parish seem relatively low, large sites close to the Parish boundary entail that over 40% of the prospective future allocation within the District would be located within or bordering Caterham on the Hill Parish. Our comments on HELAA Appendix 3 (below) indicate that many of these site allocations would be vigorously opposed by the PC and, no doubt, by adjoining Parish Councils, local groups and residents.

The PC does not agree with the provision figures put forward in any of Approaches 2a, 2b, 3, 4 or 5.

The figures should all be revised downwards before they can be regarded as acceptable. The PC's response to HELAA Appendix 3 gives details. Approach 2a proposes development of urban sites at 70 dph. While this may be feasible at sites near a wide range of facilities and close to stations, the PC regards intensification to 70 dwellings per hectare as unacceptable and unachievable in an area such as Caterham on the Hill. Approaches 3 and 5, which in addition imply the removal of sites from the Green Belt within and around CotH, would be deeply damaging and are strongly opposed.

The Delivery Strategy section also provides **employment** figures. There are yields given (in hectares) for each Approach. In Approaches 2a & 2b, the District figure is 3.2 ha for "commercial intensification" of existing employment areas (none of which are in CotH). For Approaches 3, 4 & 5 this figure increases very sharply to 87.4 ha, with contributions from most of the Clusters, including most of those within and bordering CotH. Although the figures are given as areas of land, the text refers only to "intensification" of employment sites. The PC has not found where locations and assessments for CotH are provided in this report or in the Economic Needs Assessment technical paper (see below). Also, need or demand estimates have not been found within the report to justify the figure of 87.4 ha of employment intensification.

PC comments: The PC does not understand the employment figures in this report. They are given in hectares, implying the use of additional land, but they are also stated to represent intensification on existing sites, implying that no extra land will be needed. The PC does not accept the use of these figures unless further data are made available to justify them.

Sub-section 11 also includes a brief reference to Market and Affordable Homes. The report states that, due to the Government's proposed changes, it is not yet possible to devise approaches on this issue.

Sub-section 12 is headed **the place**. This is much more general in tone and content than the previous sub-section. There are some specific proposals, but few numbers and no tables or maps. There are references to Town Centres, Retail and Leisure, Health and Wellbeing, Design and Safety, Climate Change, Natural Environment, Biodiversity and Geodiversity, European Sites, Heritage, Green Belt, Flooding, Infrastructure and Aviation. Some of these topics (such as Green Belt) are extensively assessed in other reports within the consultation. Others are only treated through general comments and broad aspirations. A future Government decision on expansion of Gatwick Airport could have a huge impact on the District, going far beyond Aviation alone.

PC comments: This sub-section headed **the place** is too vague and general in nature to enable detailed comments or views to be provided. TDC will need to set out specific measures for meeting its aspirations for the people of the District and to explain how the various improvements it seeks in quality of life and environment can be achieved in the context of the several levels of extra new development which may be imposed in line with Government policy in the NPPF. Other sections of

the PC comments illustrate the obvious conflicts in the Parish between provision of extensive new housing and (for example) traffic impacts, possible loss of local green space and loss of Green Belt.

Finally in the main consultation document, there are short sections on **Monitoring, Next Steps** and **"How can I have my say?"**, together with a Glossary of abbreviations. These process sections are brief and generally uncontroversial.

Issues and Objectives Topic Paper (30 pages + 87 pages in Appendices)

TDC Link: Open Link as above and click on [Technical Assessments](#)

This report sets out the process for reviewing a Local Plan and then lists the main Government legislation and guidance documents which need to be taken into account, together with many other reports and studies. These documents between them contain a very large number of objectives, almost all aspirational and unquantified - indeed, some are unquantifiable. Section 4 **Issues for the District** (pp24-27) sets out a large number of issues and problems facing Tandridge District, together with rather fewer positive opportunities; there are over 70 bullet points in all. Finally, there is a short section on **Objectives**, expressed in very general terms. The Issues and Objectives sections are included in the main consultation document (see above). The two Appendices contain comments by "external stakeholders and internal departments" and a further, much longer, list of issues for the District.

PC comments: The manifold ambitions and aspirations set out in this report are, for the most part, endorsed by the PC. The overarching issue for the District remains how to preserve - let alone enhance - the quality of life and environment for Tandridge residents and businesses while accommodating even a small part of the additional housing which the Government seeks to impose through the NPPF.

Spatial Approaches Topic Paper (94 pages)

TDC Link: Open Link as above and click on [Technical Assessments](#)

This report provides further detail on the methodology used to establish the seven Approaches in the main consultation document. The District is divided into 18 smaller areas to enable more detailed assessment; CotH is in Area 1.

Some major constraints affecting development potential within Tandridge are then mapped. These include: restricting development in areas of flooding ; protecting heritage assets (such as Scheduled Monuments); keeping land available to deal with waste and for mineral extraction; and protecting areas of high quality landscape and biodiversity, including AONBs, SSSIs, Ancient Woodland, Historic Parks & Gardens but **not** the Green Belt. There are several other categories; the full list of Tier 1 and Tier 2 constraints is on pp18-24 of the report. The list also includes Local Green Spaces identified through Neighbourhood Plans, and this may become relevant in CotH when the CR3 Neighbourhood Plan reaches fruition.

Readers of the main part of the report may be concerned that some constraints, such as Conservation Areas and Listed Buildings, are missing from the lists in Tiers 1 & 2 within the main part of the report. However, within Appendix 3 (pp81 ff), there is a Tier 3 constraints list which is not mentioned in the main part of the report. It appears that information on these Tier 3 constraints has been omitted in error from the report text.

The map on p54 also shows a third tier of constraints (although not indicated as such). The map has no key, but Tier 1 constraints are in red (none in CotH), Tier 2 in orange, including Westway Common, Town End Recreation Ground and Salmons Lane Green, and Tier 3 in yellow, including Caterham Barracks Conservation Area and the Tandridge part of Kenley Airfield Conservation Area. A number of Listed Buildings are shown by black spots. In Appendix 3 to the report, the tables on pages 67 & 81 show the Tier 2 and Tier 3 constraints within CotH for Area 1, though omitting Salmons Lane Green, and these are also shown on the map in Appendix 1 on p54.

>>> Note for Parish Cllrs: The map on p54 can be enlarged on the website link, to enable the Area 1 constraints to be identified more easily.

PC comments: Information on Tier 3 constraints has been omitted from the main part of the report; this should be rectified. Also, the map on page 54 is wrongly labelled and there is no key; this should also be rectified.

The Parish Council considers that all the constraints shown within the Parish in the map on page 54 and in the tables on pages 67 and 81 are of equal importance. Development in these areas should not be permitted, except within the Conservation Areas where the purpose is to protect or enhance the historic settings or to conserve Listed Buildings.

Queens Park is not included as a constraint area (despite being described elsewhere in the documents as "our flagship wellbeing site"), and some other public open spaces could reasonably be added within the category of Local Green Spaces. The CR3 Neighbourhood Plan will be making reference to these.

Housing and Employment Land Availability Assessment (HELAA) (32 pages)

TDC Link: Open Link as above and click on [Technical Assessments](#)

This report is stated to be a technical study which is an important evidence source but does not in itself represent policy or site allocations. The new acronym HELAA replaces SHLAA (Strategic Housing Land Availability Assessment) as assessments of land for economic development are also included. A table on p6 of the report sets out what the HELAA does and does not do.

The report has sections on policy context and methodology, site identification and assessment, and site capacity. There is also an estimate of the yield from Windfall Sites (of five dwellings or fewer). Employment and Traveller Sites are listed in the body of the report. The 33 Employment, or Economic Needs Assessment (ENA), sites do not include any within or near to CotH Parish. Similarly, there are no Traveller Sites in or near the Parish. However, details on the extensive list of suggested housing sites only appear in Appendices 3, 4 & 5 (see below).

The HELAA report's findings on Housing Land Availability are given in a table on p31. The total yield between 2013 and 2033 is given as 10,533. That total more than meets the Objectively Assessed

Need estimates for the same period. However, this total includes 755 units from 'Deliverable' sites (within the five years up to 2020) and 7,842 units from 'Developable' sites between 2020 and 2033.

PC comment: The housing land availability figures in the report are highly speculative. They depend on all of these sites - including a number within CotH Parish currently in the Green Belt and others which are extremely contentious - coming forward. The PC's comments on HELAA Appendix 3 (below) indicate that there is likely to be widespread opposition to some proposed sites. Other Parish Councils, local groups and residents may have similar comments to make on sites in their areas. The PC considers that these housing yield figures should not be used until the Local Plan Review has assessed the consultation responses and removed sites which are unlikely to be approved for development.

HELAA Appendix 1 - District Wide and Parish HELAA Maps (24 pages)

PC comments: On some of these maps, the HELAA sites are not correctly placed in relation to the background map features. This applies to the Caterham on the Hill map (page 6) and to the Whyteleafe map (page 23). Also on the CotH map, a road is shown running north and then north-west from the Town End / Burntwood Lane junction and passing across the north side of CAT 034 (Dormers); this does not seem to relate to any actual road. As on other maps, the word 'Kenley' wrongly appears within Caterham on the Hill, both on the CotH map and on the District map on p2. It will be necessary to have fully accurate maps for future stages of the Local Plan review.

HELAA Appendix 2 - HELAA Viability Report (about 70 pages)

This report was prepared for TDC by BNP Paribas Real Estate. It tests the 'viability' of the TDC HELAA sites and whether landowners and developers can achieve 'competitive returns'. This depends on various factors and takes account of CIL payments and TDC's 'affordable' housing requirements. The PC has not scrutinised this report in detail.

HELAA Appendix 3 - Deliverable and Developable Sites (84 pages)

Note: Within this report, 'Deliverable' means available for development within 5 years; 'Developable' means can be developed after 5 years.

PC comments: The report's assessments of sites in and adjacent to Caterham on the Hill have been scrutinised. Comments are made on each site.

CAT 004: Former Officers Mess, Kenley Airfield. Claimed to be developable after 5 years.

PC comments: Site Dwelling Yield given as 29 units; current proposals for conversion of existing Officers' Mess, provision of extension and reconstruction of former buildings, envisage 54 units. The PC supports this conversion and redevelopment subject to caveats and conditions. The PC considers that this development can and should take place immediately, not after 5 years. The PC would strongly oppose any development other than what is currently proposed as the entire site lies within the Green Belt and the Kenley Airfield Conservation Area.

CAT 007: 156-180 Whyteleafe Road. Claimed to be deliverable within 5 years.

PC comments: The claim in the TDC text that the site has access from Annes Walk is challenged on

the ground that Annes Walk is a narrow residential street with on-street parking and is unsuitable for access to this site. Two current proposals for 69 units include accesses from Whyteleafe Road. The PC has lodged objections to both proposals.

CAT 019: Caterham Reservoir, Stanstead Road. Claimed to be developable after 5 years.

PC comments: This Green Belt site, with a yield of 27 units, falls outside the CotH Parish area. Development of this site would have traffic impacts on Stanstead Road. Also, the site cannot be developed unless the concurrent Green Belt Assessment leads to its removal from the GB.

CAT 026: Ninehams Gardens. Claimed to be deliverable within 5 years.

PC comment: This site has planning permission as described in the TDC document.

CAT 029: Field at Burntwood Lane. Claimed to be developable after 5 years. Yield 53 units.

PC comments: This Green Belt site falls outside the CotH Parish Council part of Burntwood Lane, although it is immediately east of the Parish boundary. Development of this site would have significant traffic impacts on Burntwood Lane. Also, the site cannot be developed unless the concurrent Green Belt Assessment leads to its removal from the GB. We oppose any loss of GB in this area.

CAT 034: Dormers, Foxon Lane. Claimed to be deliverable within 5 years. Yield 40 units.

PC comments: The PC considers that this purpose-built modern building should be restored as a care home or for a similar use, for which there are increasing needs in the area and to provide local employment. The PC notes that the site is owned by TDC and would welcome an early statement by the Council as to its intentions for future use.

CAT 036: 69-73 Stanstead Road and CAT 045: 72 Stanstead Road. Both sites claimed to be deliverable within 5 years. Combined yield 23 units.

PC comments: These two sites fall outside the CotH Parish Council part of Stanstead Road, though they are immediately south of the Parish boundary. Development of these sites would have traffic impacts on Stanstead Road. CAT 045 is owned by TDC and the PC would welcome an early statement by the Council as to its intentions for future use.

CAT 038: Land north of Waller Lane. Claimed to be developable after 5 years. Yield 30 units.

PC comments: This Green Belt site lies within the Parish, close to the boundary with Caterham Valley. The TDC document accepts that much of this steeply sloping, wooded hillside is unsuitable for development, but claims that part of the site is suitable in principle with a yield of 30 dwelling units. The PC considers that the location of this land makes it completely unsuitable for development. Waller Lane is not suitable for any significant volume of traffic, and the site provides a key part of the narrow strip of Green Belt land separating Caterham on the Hill from Caterham Valley. Loss of any part of this land to development would also make it more difficult to defend retention of adjacent areas of GB. The PC would therefore strongly oppose the removal of any part of this site from the GB or its development for any purpose.

CAT 039: Surrey National Golf Club, Chaldon. Claimed to be developable after 5 years.

PC comments: This large Green Belt site, said to have a yield of 1076 dwellings, lies immediately west of Green Lane and Westway Ward. Development of this site would have numerous adverse impacts on areas of Westway Ward and on traffic levels within the Parish. The PC would strongly oppose the removal of any part of this site from the GB or its development for any purpose.

CAT 040: Land off Salmons Lane West and Victor Beamish Avenue. Claimed to be developable after 5 years, with a yield of 75 units.

PC comments: This site, comprising land north, south and west of the former Kenley Airfield HQ Building and NAAFI, is in the Green Belt and is also within the Kenley Airfield Conservation Area. The building is currently being restored for use as a faith school. The land around is of historic importance and its future use should have regard to its inclusion in the KACA. The PC would strongly oppose the removal of any part of this site from the GB or its development for any inappropriate purpose.

CAT 042: Land to the east of Roffes Lane. Claimed to be developable after 5 years.

PC comment: This Green Belt land, with a claimed yield of 239 dwellings, lies within Chaldon, but on the south-west boundary of CotH Parish. The PC would strongly oppose the removal of any part of this site from the GB or its development for any purpose.

CAT 051: Town End Car Park, rear of Raglan Precinct. Claimed to be deliverable within 5 years.

PC comments: This site, said to have a yield of 7 dwelling units, is owned by TDC. The HELAA report states that "no decision has been made by the Council about whether they wish to develop the site". The PC would strongly oppose the loss of this car park, which is essential for the future viability of the High Street / Town End / Chaldon Road shopping and business area. Development of the site at a level above the car park would have adverse impacts on surrounding residential areas. The PC therefore asks that TDC should make an early statement ruling out development at this site. [Note: the HELAA report implies that highway access to the Town End car park is available from Chaldon Road. This is incorrect.]

CAT 053: Church Hill View, Church Hill. Claimed to be deliverable within 5 years.

PC comments: This Caterham Valley site is shown in two parts in the HELAA report, the northern section being open land beside Church Hill (on the south-west boundary of the Parish) and the southern section being land around Pelham House in Harestone Valley Road. The PC would strongly oppose the development of the northern part of the site. As the land is owned by TDC, the PC asks that TDC should make an early statement ruling out development of this land.

CAT 054: Open Space between the Yorke Gate and Hambledon Park Estates, and other sites within Hambledon Park Estate. Claimed to be deliverable within 5 years, with a yield of 157 units.

PC comments: The two main areas of this site, as shown on the HELAA report map, are the strip of open land running east - west between the two estates, and an adjacent area to the west of the Hambledon Park estate. These open areas are much used for informal leisure and recreation and they form an essential asset for residents of the two estates and other nearby areas of Westway Ward. The PC would strongly oppose any development on any part of these sites. Note: The HELAA entry is incorrect, as the western parts of this land are in the Green Belt.

The HELAA map also shows a number of smaller areas of land within the Hambledon Park Estate, including a wooded area on its frontage with Coulsdon Road. These are equally unsuitable for development. The PC therefore asks that TDC should make an early statement ruling out development at the various sites shown on the HELAA map as CAT 054.

HELAA Appendix 4 - Unavailable Sites (36 pages)

This report lists sites, including three in Caterham on the Hill which have previously been the subject of planning applications or of speculation about development. The sites in CotH are CAT 010 (Land rear of Furrows Place and 30-42 Whyteleafe Road), CAT 022 (Essendene Park, off Whyteleafe Road) & CAT 027 (Texaco Garage, High Street). A further unlisted site in a similar category is land off Salmons Lane to the east of Annes Walk (within Whyteleafe Parish).

PC comment: These sites have not been included in the list in Appendix 3 as 'deliverable or developable' because no confirmation was received from landowners that the sites were available. Although their exclusion is welcome, landowners could change their position on site availability at any time during the Local Plan review, so it would be a wise precaution to carry out HELAA assessments and public consultation on these sites.

HELAA Appendix 5 - Unsuitable Sites (30 pages)

This report lists sites regarded as unsuitable for a variety of reasons including that they are remote from a settlement, comprise ancient woodland, are needed for employment use, are minerals and/or waste sites, or are in the AONB (or 'an AONB candidate'). There are no such sites within or bordering CotH Parish. [CAT 028 is listed in the text as Caterham Reservoir, Stanstead Road, but the map on p 7 shows a site near the A22 Caterham by-pass.]

HELAA Appendix 6 - Non-Qualifying Sites (20 pages)

This report lists sites which would each be unlikely to yield more than five dwelling units. There are three such sites within CotH Parish. These are CAT 046 (Garages behind 105-113 Coulsdon Road), CAT 055 (Caterham Community Centre) & CAT 056 (Garages behind Windmill Close).

PC comment: Although these sites are excluded from the Review, the PC understands that they are owned by TDC and would welcome an early statement by the Council as to its intentions for their future use.

HELAA Appendix 7 - Traveller Sites (20 pages)

The report does not list any traveller sites in or near CotH Parish.

Economic Needs Assessment (107 pages plus 18 pages of Summary)

TDC Link: Open Link as above and click on [Technical Assessments](#)

This report has been prepared for TDC by AECOM.

>>> Parish Cllrs are recommended to read the Executive Summary of this report before finalising the PC's response.

The consultants have surveyed existing sites (of over 0.25 hectares) in Tandridge District which are specifically in use for **industry and warehousing**. There are none in Caterham on the Hill. The consultants estimate that, to maintain current vacancy levels, the demand for industry and

warehousing provision could decline by between 6.5 and 7.9 hectares (median 7.1 ha). There are no recommendations in the report regarding future provision within CoTH.

On **office** use, the survey notes that, despite some continuing demand for office space in the District, there has been some conversion from office to residential use. The consultants estimate that, for the period to 2033, there could be a need for additional office floor-space from 1,080 to 14,522 square metres, with around 7,500 sqm as the median. Conversion to a level of new land requirement is not straightforward, but this could be from 0.1 to 1.2 hectares in the District in the period up to 2033. The report's recommendations include that, in order to provide for the estimated additional need, TDC should "facilitate growth of office space across the District" and should "expand its current town and local centres policies to safeguard and strengthen existing office space suitable for office use within its town centres ... and local centres", including Caterham on the Hill.

PC comment: The Parish Council agrees with and accepts the recommendations of this report.

Strategic Highway Assessment Report (86 pages including 4 Appendices)

TDC Link: Open Link as above and click on [Technical Assessments](#)

This report was prepared for TDC by SCC. It estimates the traffic impacts across and around the District arising from the various 'Approaches' set out in the main consultation document, but only during the weekday morning peak period. [Incidentally, the 'Approaches' are referred to in this Highway Assessment as 'Scenarios'.]

There is a great deal of detail in this report, but the overall conclusions are unsurprising. The Approaches / Scenarios which include major new levels of housing development are expected to lead to significantly higher traffic congestion than already occurs within the District. In Scenarios 3 & 5, the worst affected roads - including some in Caterham - would suffer "unstable" traffic flows with a "poor level of comfort" for drivers, and "a shock wave affecting traffic upstream" (*sic*) (see, for example, the tables on pp26-28 & 35). There would also be wider impacts, including some outside the District. The M25 and M23, predicted to be over capacity by 2031, would be adversely affected.

The evening peak period, weekday mid-days and weekends were not studied, but the implications are clear from this morning peak study.

>>> Parish Councillors are advised to look at the Tables on pp26-28 & 35 and on pp39-42 & 45, and to read the Summaries on pages 4 & 5 and pages 53-54.

PC comments: This report demonstrates that a significant increase in housing development in or around Caterham on the Hill would lead to unacceptable traffic impacts. Although the report focuses on certain roads and junctions and on the weekday morning peak period, similar impacts (perhaps on slightly different parts of the network) would occur at other times. The report refers to "mitigation" measures. However, the Parish Council considers that any major measures to accommodate higher traffic flows in or around Caterham on the Hill could not be achieved without unacceptable damage to the fabric and character of the Parish.

It is the view of the Parish Council that this report alone demonstrates that the housing provisions mooted in Approaches (Scenarios) 3 and 5 are unacceptable and unachievable.

Green Belt Assessment (55 pages, plus 519 pages in 6 Appendices)

TDC Link: Open Link as above and click on [Technical Assessments](#)

This report aims to assess the extent to which existing Green Belt land in Tandridge serves one or more of the five GB purposes set out in the Government's National Planning Policy Framework (NPPF). The report does not aim to assess whether any areas should be added to the Green Belt.

The five purposes are:

- To check the unrestricted sprawl of large built up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns;
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

It will be seen that the importance of the Green Belt is mainly that it is a 'belt' rather than that the land within it is necessarily 'green'.

As with the present set of documents as a whole, TDC asserts that this report "will not draw up or review Green Belt boundaries, nor will it assess the suitability of land for development or make recommendations as to whether the Green Belt boundary should be altered". However, it is likely that the report and its conclusions will, unless challenged, influence subsequent stages of the plan in which boundaries will be reviewed. It is unfortunate that the assessments of existing GB areas are not balanced by any study of potential additions to the GB.

The report sets out the methodology used in the review and its historic context (national and local). Tandridge is divided into numerous areas in terms of the status of the many towns and villages in relation to the GB. Caterham (Caterham on the Hill and Caterham Valley) is a "settlement which is inset from the Green Belt" (report p12). This jargon means that the urban areas of Caterham are not within the GB. The report then looks briefly at changes to GB boundaries, including in Caterham and Whyteleafe. There is some confusion in this section about the location of Kenley Airfield and the administrative areas in which changes to GB boundaries have been made and development has taken place (report p14). This confusion arises in more detail in Appendix A (see below).

PC comments: In all the TDC documents, the locations of Kenley (in Croydon) and Kenley Airfield (mostly in Croydon, but with part of the Conservation Area in Tandridge), the minor change to the administrative boundary, changes to the Green Belt, and also the location of recent housing development, need to be accurate and clear. This comment also applies to Appendix A (below).

Caterham on the Hill is a large Parish, with a population of some 13,000. It forms the historic core of Caterham and is distinct from Caterham Valley and Whyteleafe. A major purpose of the GB in this area is to provide a belt of open land which continues to separate the main parts of these settlements from each other. The Parish Council therefore concludes that Caterham on the Hill should be treated throughout the Local Plan Review as a distinct location, separate from Caterham Valley and Whyteleafe.

For its **Strategic Assessment** (from page 17), the report divides the Tandridge GB into three areas, approximately north to south in the District. CotH Parish is in Area A. In terms of meeting objectives, the report states (para 5.10) that Strategic Area A has:

- > Strong role in containing the urban conurbation of London and the large built up areas in the District and outside;
- > Prevents the coalescence of a number of the towns within the strategic area;
- > Contributes less effectively towards safeguarding the countryside as large areas in this strategic area contain development and infrastructure; and
- > Varies in how it preserves the setting of Conservation Areas; those in the outlying countryside are preserved by this strategic area of Green Belt; Conservation Areas within the urban settlements are not.

PC comment: These conclusions are for the most part supported by the PC. It will be important to prevent the future coalescence between Caterham on the Hill and Caterham Valley by maintaining the Green Belt areas between these two settlements (see also below). The wording of the final point is noted, but this should not be taken as implying that the Caterham Barracks and Kenley Airfield Conservation Areas are unsatisfactory or not worth conserving. Conservation Areas within larger settlements are of equal value to those in small villages. Once again, in the map on p19 Kenley is wrongly placed within Tandridge District south of Whyteleafe; this should be corrected. The text on p17 correctly lists Kenley within London.

The report then provides **Parcel Assessments** for each of 47 GB 'Parcels' within the District. There is no map of these in the main report. There is an overview map on p252 (best viewed online) and there are detailed local maps in Appendix D. The Parcels of greatest concern to Caterham on the Hill are: GBA 004, which runs north-south through the eastern part of CotH and also within Whyteleafe and Caterham Valley (and, in the south, within Chaldon); GBA 010, which lies to the west of CotH and includes Chaldon golf course, and GBA 046 & 047, two small areas adjoining Coulsdon Common. There are also Coulsdon and Kenley Commons to the north of CotH, which are within the LB Croydon Green Belt. There is a map showing all these areas on p275 of the report. However, that map does not show contiguous GB areas in LB Croydon.

The report provides an overview of the GB areas, with further detail in Appendix D. On p31, the report deals with Caterham on the Hill and Caterham Valley together, and states that "the Green Belt plays a key role in keeping the two parts of Caterham and Warlingham / Whyteleafe separate but at the same time it has large scale development within it that encroaches upon the countryside". The report adds that there is "a part [of the GB] to the south of Caterham, which has large scale development within it that has an encroaching impact on the countryside". On p32, the report states: "There are also two small pieces of Green Belt (GBA 046 & 047) to the north of Caterham that serve no Green Belt purpose and have little connection to the settlement".

The report also has sections on Whyteleafe (p32) and Chaldon (p33).

PC comments: It would have been helpful to have had a map of the Parcels within the main report. It would also have been helpful to show the TDC / LB Croydon boundary on the map on p275, together with areas of GB in LB Croydon which are adjacent to Tandridge.

Neither of the statements on p31 about "large scale development" within the GB around Caterham applies to Caterham on the Hill (except within the academic campus). It would have been better to treat CoH and Caterham Valley separately here, particularly as a main purpose of GBA 004 is to separate the two.

The PC objects strongly to the report's comment on GBA 046 & 047. Both adjoin Coulsdon Common, and GBA 047 forms an integral part of the Common; it is shown thus on maps displayed by City (of London) Commons, which owns and manages Coulsdon and Kenley Commons. This statement in the report should be removed, or changed to reflect the actual situation.

The report lists **Areas for Further Investigation**. These have a different set of numbers to those for the GB Parcels. Again there is no map in the main report, but there is one in Appendix F, p574).

Area of Further Investigation 006, titled "District Boundary with Croydon, adjoining Kenley", refers to "urban sprawl from Kenley Aerodrome", but the map shows 006 as an area east of the A22 and not near Kenley Airfield (as it is now generally called).

Area of Further Investigation 008 comments on GBA 004, the areas separating Caterham on the Hill and Caterham Valley. The full text of these comments is reproduced here.

As set out in the assessment on Strategic Area A, the north of the District has a role in preventing the sprawl from Greater London. The development that has occurred in Kenley has created sprawl into Caterham. As this area has changed substantially since Green Belt has been designated, this parcel is at risk of development. This is particularly apparent in that the space between Caterham on the Hill and Caterham Valley as it was designated for residential development in the 1974 Surrey Development Plan. The reason why this area was never built out and put back into the Green Belt is unknown. However, it could be due to the topography of the parcel. For all these reasons, this area has been identified as an area for further investigation.

Further, this thin strip of Green Belt separates Caterham Valley, Caterham on the Hill and Whyteleafe, and at some points these settlements are in very close proximity to each other. The redevelopment of Kenley Aerodrome, whilst not physically merging Kenley with Caterham, has created the perception of settlements merging. Further, the area contains a mix of uses, such as schools and sports grounds, which add to the perception that the settlements adjacent are merging. Whilst the topography and woodland between the settlements assist in preventing coalescence, the Green Belt also plays a role and as such this parcel is extremely effective at meeting this purpose. To understand the relevance of this parcel in preventing coalescence, this area has been identified as an area for further investigation.

PC comments: The TDC report's comments on Area of Further Investigation 008 contain errors and are confusing. The statements that "the development that has occurred in Kenley has created sprawl into Caterham" and "the redevelopment of Kenley Aerodrome, whilst not physically merging Kenley

with Caterham, has created the perception of settlements merging" are wrong. The author may have confused Kenley (in LB Croydon) with the redevelopment of the Kenley Park Estate (in the northern part of Caterham on the Hill); this was previously the site of MoD housing (albeit with a minor change in the Tandridge / Croydon boundary around twenty years ago). Kenley Airfield itself is a Conservation Area (partly within Croydon) and has not been redeveloped.

The Parish Council offered help to TDC in understanding GBA 004, which is complex and multi-faceted. Unfortunately, this offer was declined. This section must now be rewritten.

The PC has no objection to further investigation of GBA 004, but further work needs to be both accurate and aware of the important function of this area in separating Caterham on the Hill from Caterham Valley and Whyteleafe.

Areas of Further Investigation 048 & 049 relate to GBA 046 & 047. The report's comments are:

The size and location of the Green Belt mean [these areas] have little impact in relation to preventing sprawl or coalescence of Caterham on the Hill with Old Coulsdon or preserving the setting of a Conservation Area. As they do not serve any of the purposes in their entirety and as such require further consideration as to whether they should form part of the Green Belt.

PC comments:

As stated above, the Parish Council objects to the report's opinions on Areas of Further Investigation 048 & 049 (GBA 046 & 047). In particular, any attempt to remove part of Coulsdon Common (GBA 047) from the Green Belt (solely, it seems because of the location of the TDC / LBC boundary) would be strongly resisted. The open and undeveloped part of GBA 046 includes many trees, and its removal from the GB would be pointless. There needs to be consultation with City (of London) Commons before work on these two sites is taken further.

The report ends with a series of **Recommendations** and a **Glossary**. The Recommendations are general in nature and concern possible future stages in the Green Belt Review process.

Green Belt Assessment, Appendix A: Historic Assessments

In the remaining sections of this consultation response, the PC's **comments** appear throughout and not in separate paragraphs.

An index indicating the page numbers for each settlement would be helpful.

A.23. Caterham (Caterham Valley, Caterham on the Hill) (p197 - p208)

Q1 (about development in the GB and changes to GB boundaries)

Surrey County Development Plan 1958 The report (on p197) states that Box 2 in Figure A.23.1 shows that "the area behind Ninehams Gardens" was not in the Green Belt in 1958. However, the map showing the area is too small to be sure of this without inspecting the original document. There

are actually two areas (near to each other, one behind Ninehams Gardens, the other further west behind Ninehams Road) which are included in the main GB assessments (GBA 046 & 047).

Surrey Development Plan 1974 The text on p198 states that Box 2 in Figure A.23.2 shows that "two small parcels [GBA 046 & 047] were put into the Green Belt" and claims that this was done "to provide for a primary school and a secondary school, shown as PS and SS on the map". However, the map does not show PS or SS at this location, so this needs to be corrected. Also, the blue border of Box 2 obscures the western of the two areas. It would be helpful for the text of this Plan to be checked to ascertain the reasons for this change in the GB, bearing in mind that these two small sites border on the GB in LB Croydon.

Surrey Structure Plan 1980 No comment by the PC on this text.

Draft Whyteleafe Local Plan 1987 This plan included a map that shows the Green Belt around Caterham. It appears from this map that the two areas GBA 046 & 047 were, once again, not in the GB. However, this was only a draft plan, and another 'removal' from the GB is noted as a "mapping error". The PC considers that an out-of-date map may have been used for this draft plan, and that no weight should be accorded to the text on p199 of the report, or to Figure A.23.3 on p200, or to the zoomed-in maps on p199.

Surrey Structure Plan 1989 No comment by the PC on this text.

North of the Downs Local Plan 1992 The report text on pp200-201 is not fully understood; also, there is reference to Whyteleafe rather than Caterham. Perhaps locations could be indicated more clearly, with a map showing the changes.

Tandridge District Council Local Plan 2001 The coloured map on p201 is the first which clearly shows the two areas of GB, one behind Ninehams Gardens (not Nineham Gardens as in the caption) (GBA 046) and the other further west behind Ninehams Road (GBA 047). The text on p202 claims: "The area in the box 2 shows the two areas behind Nineham Gardens as Green Belt. The Plan does not set out any justification for this change. The two small spaces between Nineham Gardens are no longer allocated for open space provision and instead there is an access road into the area on the east and the area on the west is not used as public open space." However, no textual evidence has been provided for this claim that there have been recent changes to the status and boundaries of GBA 046 & 047. Local knowledge of the area suggests that the status of these two small areas did not change at the time of the 2001 Local Plan, and that GBA 047 in particular has been part of Coulsdon Common for very many years. None of the earlier monochrome maps shows these two areas with sufficient clarity to determine whether there was a change in GB status or boundary in 2001. The map on p201 is also the first to show the slight revision to the Tandridge DC / LB Croydon boundary to incorporate all of the then MoD housing and which has since been redeveloped as the Kenley Park Estate.

2008 Core Strategy No comment by the PC on this text or map.

Q2 (about 'inset' areas and changes to urban areas)

On pages 202-203, there appears the statement: "Development within the Green Belt near Caterham has been taking place on four major sites since the designation of the Green Belt: St Lawrence's Hospital; Caterham School; De Stafford School; Kenley Aerodrome." On p204, Figure A.23.7 is captioned "St Lawrence's Hospital in 2014". This shows the Yorke Gate estate, with part of the Hambledon Park Estate to the south and part of the redeveloped Caterham Barracks 'Village' to the north. Also on p204, Figure A.23.8 is captioned "St Lawrence's Hospital in the Tandridge DC Local Plan 2001". This mainly shows the boundary (in red) of the Caterham Barracks Conservation Area, which was designated in 1995; the Barracks was never within the GB.

On p205, it is unhelpful that assessments relating to Kenley Airfield and de Stafford School are included with Whyteleafe.

On p206, under Q4, the report states: "There have also been a number of schools where the playing fields have been protected. The exception to this is Caterham Secondary School, which was previously Portley House School where development has taken place and the school has significantly grown in size." The former Portley House School is now the main building of Sunnydown School, whereas most of the fairly recent development has been around de Stafford School, including the Sports Centre.

A.24. Whyteleafe (p208 - p217)

There are numerous references to areas within Caterham on the Hill (and to Caterham Valley) in this Whyteleafe section of the Appendix. This is confusing and unhelpful. The relevant sections of text and maps should be moved to section A.23 or preferably to separate sections on Caterham on the Hill and Caterham Valley. In particular, the history of the changes to the GB separating the Hill and the Valley is useful, but it should be in the correct place in this Appendix.

Comments on section A.24 Text on p211 relating to Caterham Secondary School and Kenley Aerodrome is dealt with more fully on pp215-216. On these pages, in the sub-section headed *Kenley Aerodrome*, the removal from the GB of what was originally MoD housing to the east of Buxton Lane (including Rosebriars, Hillhurst Gardens and the former Kenley Close) is shown by the comparison between Figures A.24.6 and A.24.7. However, it would be useful for Figure A.24.7 to cover the area immediately to the west of what appears on the map, so that the TDC / LBC boundary change is also shown. Flintfield House (referred to near the top of p215) was demolished over thirty years ago. The most important buildings within the Kenley Airfield Conservation Area are the former Officers' Mess and the former HQ / NAAFI building. The sub-section headed *Portley House School* refers to the group of schools now called Audley, St Francis', Sunnydown and de Stafford. The caption to Figure A.24.9 could helpfully be revised to make that clear.

Parish Council conclusions on TDC Green Belt Assessment, Appendix A

Caterham on the Hill is a large Parish, with a population of some 13,000. It forms the historic core of Caterham and is distinct from Caterham Valley and Whyteleafe. A major purpose of GBA 004 is to provide a belt of open land which continues to separate the main parts of these settlements from each other.

There is considerable reference in this Appendix and elsewhere to "major" changes to the Green Belt in Caterham on the Hill and to "large scale" development in the Green Belt in this area. The two main

changes, at St Lawrence's Hospital and in a smaller area south of Kenley Airfield, reflected the pre-existing buildings of the Hospital and the RAF (later MoD) housing associated with the Airfield. Arguably these areas should never have formed part of the GB. The only significant recent development within the CoTH area of the GB has been at the academic campus, particularly at de Stafford. This was permitted GB development at the time it was carried out.

On Appendix A, the Parish Council therefore concludes that the Caterham on the Hill sections of the text should be brought together in a single location, separate from references to Caterham Valley and Whyteleafe. Corrections then need to be made before they become an accurate record of the history of the Green Belt relating to Caterham on the Hill. Assessments affecting future Green Belt or development policies should not rely on this Appendix until these changes have taken place. Even then, Appendix A, while interesting historically, should not be used as a reason for future changes to the GB.

Appendix B: Strategic Green Belt Area Assessments, Strategic Area A

Para B.2.1.1 The claim that "large scale" development has occurred at various (present and former) Green Belt areas in Caterham on the Hill is an exaggeration. When the St Lawrence's Hospital site was removed from the GB in the 1992 Plan, the hospital had been in place for many decades. Other GB development was generally pre-existing, small in scale or permitted in the GB at the time it took place. The impression created in this paragraph is of widespread development within the GB in Caterham on the Hill. This is incorrect.

Para B.2.1.2 There is a footnote symbol but no footnote. It may have been intended to be "Caterham on the Hill and Caterham Valley". The Parish Council considers that the two settlements should be treated separately. The sentence: "Some of the development around Kenley airfield has taken place since the designation of Green Belt in this area and gives the perception that Kenley and Whyteleafe have merged" is wrong and should be deleted. The original MoD housing development on a small area of GB south of Kenley Airfield took place some decades ago, and that land was subsequently removed from the GB. Also, it is not in Kenley and it is not near Whyteleafe. The final sentence of this paragraph should also be removed unless it relates to the area north of Whyteleafe on the A22.

Para B.2.1.3 This paragraph relates to the Caterham, Chaldon, Whyteleafe and Warlingham areas in general:

The characteristics of the area are dominated by infrastructure features; railways and roads that lead towards the conurbation of London. As a general characteristic, the area appears slightly dilapidated emphasised through the degraded vacant buildings and industrial estates. There are some large open spaces that are currently tired and overgrown. The amount of countryside in this Strategic Green Belt Area is minimal in comparison to the other Strategic Green Belt Areas, limiting its tranquillity and serenity. There are a number of ancient woodlands and the topography of the area is very steep, sitting on a ridge. However due to the valley and the wooded areas, the settlements themselves are quite obscured. Overall, this band's contribution to this purpose is less effective than B and C, for example, that is predominantly open countryside.

These disparaging comments give a misleading impression and are greatly resented by Caterham on the Hill Parish Council. These towns and villages are at risk of coalescence and in some places of merging with Greater London, and this is what the Green Belt is designed to prevent. Caterham on the Hill and its neighbours need the strong support of Tandridge District Council throughout the Local

Plan Review process. They do not need derogatory, inaccurate or irrelevant comments. This paragraph should be withdrawn and rewritten.

Para B.2.1.5 Once again, the comment about development at Kenley Airfield is misleading, and the statement "the perception that Kenley has merged with Caterham" is incorrect and should be deleted.

Appendix C: Conservation Areas Map

This map omits GBA 047. The Kenley Airfield (not just "Kenley") Conservation Area straddles the boundary into LB Croydon.

Appendix D: Parcel Assessments

D.5 GBA 004 (pp 275-283)

Figure D.5.1 on page 275 shows the Tandridge Green Belt (area GBA 004) which separates the main part of Caterham on the Hill from Caterham Valley and Whyteleafe. However, it does not show contiguous GB within LB Croydon, and thus gives a misleading impression of a lack of GB to the north of Caterham. The TDC / LBC boundary and the Croydon GB should be shown (perhaps by hatching) so as to give an accurate picture. This comment also applies to other maps within this Appendix which border LB Croydon.

Para D.5.4 It is worth adding that TDC describes Queens Park as "our flagship wellbeing site".

Para D.5.4 or D.5.5 There needs to be a sentence here about the GB land between Waller Lane and Burntwood Lane, particularly as there have been speculative development applications in parts of this area.

Para D.5.6 In the last sentence, Kenley Aerodrome is now known as Kenley Airfield. There are two "large detached buildings" within the Kenley Airfield Conservation Area, both of which are Listed Grade II by Historic England. The former HQ / NAAFI building on the southern side of the Airfield is currently in course of conversion to become an independent school. The former Officers' Mess south-east of the Airfield is currently the subject of a planning application for conversion to use as flats. The final phrase "impacting on its rural feel" is irrelevant, as the Green Belt is not primarily intended solely for rural areas. Some redrafting of this paragraph is needed.

Para D.5.7 (and elsewhere in the Green Belt Assessment report) The references to "substantial change" in this area are exaggerated. As stated, the academic campus - particularly de Stafford School - was enlarged under previous GB policy when school development was a permitted exemption. Kenley Airfield itself has not been developed at all and is a very large open area of GB, mainly within LB Croydon. The former MoD housing in a relatively small area south of the operational airfield were removed from the GB, and there was also an amendment to the TDC / LBC boundary before part of this land was redeveloped as the Kenley Park Estate. Statements implying that this was a major change to parcel GBA 004 / AFI 008 are misleading.

Para D.5.10 Conclusion on Purpose 1 (to check unrestricted sprawl of built-up areas) Once again, there is confusion here. The development of Kenley Park Estate is not "in Kenley", despite the name. It is an integral part of Portley Ward in Caterham on the Hill and it is well separated from suburban Kenley (within LB Croydon) by the open GB land of the Kenley Airfield Conservation Area. This has not "created sprawl to occur into Caterham". The two sentences should be corrected. The

paragraph should also highlight the success of GBA 004 - despite development pressures - in preventing the coalescence of Caterham on the Hill, Caterham Valley and Whyteleafe.

Para D.5.12 The text appears to suggest that Queens Park could be removed from the Green Belt. As this is presumably not the intention, it should be clarified. Also, there is adequate GB land east of the de Stafford complex to separate this from the main parts of Whyteleafe and Caterham Valley.

Para D.5.13 This is incorrect for the reasons given above. The paragraph should be deleted.

Para D.5.14 The para states that "Kenley Aerodrome ... is not identified as an individual settlement under this purpose". This is not understood, as Kenley Airfield is an open area within the (mainly LB Croydon) Green Belt. The author now claims that "the development at Kenley Aerodrome has added to the perception that Kenley and Whyteleafe have merged". This is not correct and the sentence should be removed.

Para D.5.16 Yet another erroneous reference to Kenley Aerodrome needs to be removed.

Para D.5.17 And again! There seems to be great concern about the Kenley Park Estate redevelopment of former MoD housing, but this is based on a misunderstanding of its location and relatively modest scale. Indeed, this whole paragraph creates a misleading impression of GBA 004 / AFI 008 and it should be deleted or rewritten.

Paras D.5.17 & D.5.18 Conclusion on Purpose 2 (to prevent neighbouring towns merging) Subject to the comment above, the text in these paras is supported by the Parish Council.

Paras D.5.19 to D.5.22 The statement that there are no conservation areas within GBA 004 is wrong. There are no urban conservation areas, but part of GBA 004 lies within the Kenley Airfield Conservation Area (which straddles the boundary with LB Croydon). It may be that these paras have been included in error, as the same issue is dealt with differently below.

Para D.5.26 The purpose of this paragraph is not clear. If it implies that Queens Park could be removed from the Green Belt, this would be strongly resisted by the Parish Council.

Paras D.5.29 and D.5.33 These Conclusions paras on Purpose 3 (saving the countryside from encroachment) and Purpose 4 (preserving the setting and character of history towns) are accepted by the Parish Council.

Paras D.5.34 & D.5.35 Overall Conclusion on GBA 004 Caterham on the Hill Parish Council considers that the main and essential purpose of GBA 004 is to act as a permanent buffer preventing the coalescence of the main parts of Caterham on the Hill with Caterham Valley and Whyteleafe. This objective should be clearly stated and endorsed within this conclusion. These paragraphs could helpfully be redrafted to give greater prominence to this aim.

D.47 GBA 046 & 047 (pp 541-546)

Figure D.47.1 The map should show the TDC / LBC boundary and the Green Belt within Croydon.

Figures D.47.2 to D.47.4, and text D.47.1 to D.47.6 The photos show the pleasant, partly wooded and partly open area. Photo D.47.2 shows part of Coulsdon Common rather than GBA 046 itself, so could be misleading. Photos D.47.3 & D.47.4 show that GBA 047, behind gardens in Ninehams Road, is open and attractive. This is a typical 'urban fringe' Green Belt area and it is an integral part of Coulsdon Common. The text does not acknowledge this, and should be changed. It should be noted

that the Merlewood Estate Office is not in the GB; it is located between the two parcels GBA 046 and GBA 047. The text needs to be corrected here.

D.47.7 Conclusion on Purpose 1 (to check unrestricted sprawl) Contrary to what is stated in the report, these areas should be taken together with Coulsdon Common in LB Croydon. As such they form an integral part of the GB separating Old Coulsdon from Caterham. The implication that LB Croydon or City (of London) Commons would consider permitting development of Coulsdon Common is absurd and should be deleted.

D.47.8 to D.47.12 Purpose 2 (to prevent neighbouring towns merging) Again there is pointless speculation about southward development of Old Coulsdon, though this is acknowledged as "unlikely". The two areas GBA 046 and 047 (especially the latter) should be seen as part of Coulsdon Common and not as small isolated pockets of GB within Tandridge.

D.47.13 to D.47.17 Purpose 3 (to guard the countryside from encroachment) Para D.47.14 is incorrect. Although there are some buildings in GBA 046, the main Merlewood office and yard are located between GBA 046 & GBA 047. The north side of GBA 046 adjoins Coulsdon Common. GBA 047 has back gardens of Ninehams Road and part of Merlewood on two sides, not three. As noted before, it is managed and used as an integral part of Coulsdon Common. On D.47.17, proximity to housing applies in many 'urban fringe' GB areas, yet limiting further outward development is the purpose of such parts of the GB.

D.47.22 Overall Conclusion on GBA 046 & 047 Caterham on the Hill Parish Council objects strongly to the report's conclusion that "neither parcel is considered to serve the purposes of the Green Belt". The author seems to have viewed these areas in isolation from the adjoining GB in LB Croydon. GBA 047 is a typical 'urban fringe' Green Belt area and it is an integral part of Coulsdon Common. GBA 046 also adjoins the Croydon Green Belt. Both are, in effect, small elements of the LB Croydon GB. The fact that the administrative boundary places them in Tandridge rather than Croydon is irrelevant.

Appendix E: Settlement Assessments

E.17 Caterham (pp 561-562)

Para E.17.2 In the first line, "some" would be more accurate than "many". The distinction between Caterham on the Hill and Caterham Valley needs to be repeated here.

Para E.17.4 The Caterham Barracks Conservation area faces the GB on its west side. The Kenley Airfield Conservation Area as a whole (rather than just its Tandridge part) is bounded by Coulsdon and Kenley Commons; development is limited to parts of its east and south sides. Also, Kenley Airfield was closed for powered aircraft in the 1970s; it is used for gliding and for a variety of informal leisure purposes.

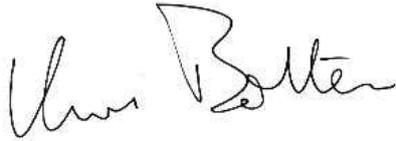
Para E.17.5 GBA 004 does not have "large scale development within it". The present GB area only has significant development at the academic campus, the Dene Hospital, St Mary's Church and the two Listed Buildings in the Kenley Airfield Conservation Area, plus some scattered buildings elsewhere.

Para E.17.7 This paragraph is wrong and should be removed or redrafted. See the PC's comments above.

Appendix F: Map of Areas for Further Investigation (AFIs)

These areas are unhelpfully numbered differently from the Green Belt Area numbers used in the bulk of the report. It would be preferable to retain the GBA numbers, with suffixes where there are two or more AFIs within a single GBA.

TDC has published (or referenced) a number of other reports as part of the Local Plan Review process. Those which have been studied by the Parish Council are shown in the Appendix.



**Chris Botten, Chairman
Caterham on the Hill Parish Council**



**Hilary Turner, Chairman, Planning Committee
Caterham on the Hill Parish Council**