

APPENDIX 1 – SCC HIGHWAYS PRE-APPLICATION RESPONSE JUNE 2022

Highway Authority Pre-Planning Advice

Land surrounding Victor Beamish Avenue, Caterham

20 June 2022



Introduction

The following advice is offered to Motion following a request for pre-planning application advice and further to a review of the information provided to the Highway Authority and a subsequent site visit on the 24 May 2022. The advice is offered without prejudice to any future planning application submitted and any advice or recommendations provided by the Local Planning Authority.

Proposed development

The proposed development comprises the erection of 88 residential units and the site has been identified as a draft allocation for housing within Tandridge District Council's forthcoming Local Plan. The development will be accessed via Victor Beamish Avenue which is a 30 mph unclassified road.

Policy and Standards

- National Planning Policy Framework (NPPF 2021)
- Tandridge District Saved Policies DP5, CSP12
- Surrey Design Guide Technical Appendix
- Tandridge Parking Standards DPD
- Vehicular, Cycle and Electric Vehicle Parking Guidance for new Development September 2021
- Travel Plans – A Good Practice Guide for Developers 2018
- Manual for Streets 1 & 2
- Surrey Local Transport Plan

Site Access

Whilst the Technical Note states that Victor Beamish Avenue is a private road, in accordance with Surrey County Councils records the section of road from the junction of Salmons Lane West to the access to Kenley Aerodrome is an unclassified publicly maintainable highway subject to a 30 mph speed limit. The road has a footway on the western side only and street lighting.

Victor Beamish Avenue has a junction with Salmons Lane West which is a C classified local distributor road with footways both sides and street lighting. A drawing has been provided demonstrating visibility splays of 2.4 m 'x' distance by 43 m 'y' distance is achievable in both directions and a swept path diagram showing that a refuse vehicle can turn into and out of the road, has also been provided.

The proposed development will be both sides of Victor Beamish Avenue and a number of access points are proposed. These should be provided with visibility splays of 2.4 m 'x' distance by 43 m 'y' distance in both directions with no obstruction above 0.6 m in height and appropriate width and junction radii.

As there is only a footway on the western side of Beamish Avenue, consideration should be given to providing a footway on the eastern side which may only be possible for part of its length due to the existing mature trees. An informal crossing point between the footways should also be provided.

A Road Safety Audit (RSA) should be submitted with any subsequent planning application. Stage 1 RSAs can be undertaken externally or internally by SCC which would be preferable. If the RSA is to be undertaken externally, the CV's of the auditors should be submitted to SCC in advance of the RSA being undertaken to check compliance with GG119.

Turning

It should be possible for all vehicles refuse/emergency/delivery/removal entering the development to be able to turn and therefore enter and exit onto Victor Beamish Avenue in forward gear. Turning overlays should be provided to demonstrate that this is possible.

Delivery of Development Highway Works

Any proposed highway works will require a Stage 2 Safety Audit to be conducted by SCC and which should be delivered by a Mini S278 Agreement under the provisions of the highways Act 1980. Works constructed under a Mini S278 Agreement will require the payment of a commuted sum for the future maintenance and replacement cost of additional highway features. A Mini S278 Agreement can be used if the cost of the works is under £50,000 and the works are on highway land. If any of the land needs to be dedicated then a full S278 Agreement will be needed.

Please see more details on our website that shows the process and fees included once you have planning permission, please send us the requested forms to get the process started.

<https://www.surreycc.gov.uk/land-planning-and-development/planning/transport-development/delivery-of-development-highway-works>

Layout

It has not yet been confirmed whether the internal roads would remain private. Whether or not the internal roads are to be adopted as maintainable highways, the application drawings must conform to Surrey Design. This would require an Agreement under S38 of the Highways Act 1980. This should be clarified at the planning stage.

The development should provide good quality shared foot/cycle paths throughout the site with a width of at least 3 m and lit.

Sustainability/Accessibility Advice

In respect of promoting sustainable development, the National Planning Policy Framework (2021) states that the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. It also states that local planning authorities should support a pattern of development which, where reasonable to do so, facilitate the use of sustainable modes of transport, and that developments should be located where practical to gain priority to pedestrian and cycle movements, and have access to high quality public transport facilities. The NPPF does however, require that opportunities to maximise sustainable transport solutions will vary from urban to rural areas.

The County Highway Authority (CHA) would like to know the sustainable transport options for the site when assessed against the above policies. Sustainable transport modes other than the private car should be considered where possible to ensure the proposed development combines with the sustainable transport objectives of the NPPF 2021.

The development is situated more than 2 km from Caterham Town Centre and not within a reasonable walking distance however there are a limited number of facilities within a shorter distance. There are bus stops located close to the site but no crossing facility to reach the

one opposite Victor Beamish Avenue. Whyteleafe South Station is 1,3 km from the site however, there is no crossing point from Salmons Lane over Whyteleafe Road and pedestrians have to walk some distance in the carriageway as there are no footways along Salmons Lane on route to the railway station.

A thorough assessment of the walking routes to the various more local facilities such as supermarket, school etc should be undertaken to identify whether any improvements are possible such as additional crossing points etc,

There is a bus stop located on Salmons Lane and consideration should be given to providing a shared pedestrian/cycle path from the development in this location to provide additional permeability.

Trip Generation

SCC supports the use of the TRICS database to demonstrate the likely trip rates associated with the development. The sites chosen should be in a comparable location in terms of accessibility of the site. I note that 'suburban' category has been chosen which is considered acceptable. Multi modal TRICS surveys should also be included.

Traffic Surveys

It is considered that junction impact assessments should be undertaken for the following closest junctions to the site.

- Victor Beamish Avenue/Salmons Lane West
- Salmons Lane/Whyteleafe Road
- Salmons Lane West/Whyteleafe Road
- Salmons Lane West/Buxton Lane/Ninehams Road roundabout junction

There may be other junctions that need to be included but this can be confirmed once distribution diagrams have been produced.

Tandridge District Council Planning Department should be contacted to confirm any committed development.

Parking

Parking provision for the site should be provided in accordance with the Tandridge Parking Standards SPD 2012 and sufficient parking should be provided so that no overflow parking takes place on the public highway.

Cycle Parking

Flats and houses without garages or gardens, are subject to providing secure and covered bicycle parking. Surrey County Council's 'Vehicular and Cycle Parking Guidance (September 2021) requires that 1 & 2 bedroom units be provided with a minimum of 1 secure and covered cycle parking space each and for 3 or more bedroom units be provided with a minimum of 2 cycle parking spaces each. Adequate space should be laid out within the development site for the secure parking of bicycles in an easily accessible location. Vertical cycle stands mounted on walls are unacceptable. Charging points for electric bikes should also be provided. If a planning application is submitted details of the cycle stores including measurements of cycle racks should be provided.

Electric Vehicle Charging

New development is expected to include charging provision for electric vehicle use as standard. Surrey County Councils 'Vehicular and Cycle Parking Guidance (2021) states that

the County Council will seek the provision of electric vehicle (EV) charging points within all new developments. As per this advice 1 fast charge socket should be provided for each house, flat or apartment (allocated and unallocated spaces). According to current guidance the charge point specification is 7kw AC 32 Amp Single Phase dedicated supply.

Travel Plan

A Travel Plan will be required with any formal planning application for the proposed development and a monitoring fee of £4,600 would need to be paid.

SCC would like residents to be provided with either vouchers for public transport or towards purchase of bicycles as suggested in the Technical Note. The value of these to be agreed.

[Travel plans: new development - Surrey County Council \(surreycc.gov.uk\)](http://surreycc.gov.uk)

Mitigation

Highway Improvements.

- A crossing point should be provided over Salmons Lane West for residents of the development to be able to reach the bus stop opposite. SCC carried out a feasibility study into the provision of a pedestrian island in the vicinity of Victor Beamish Avenue within the last couple of years and unfortunately it is not possible to construct an island as there is a high pressure gas main running down the centre of the carriageway. It may therefore only be possible to provide an informal crossing with pram crossing points and tactile paving.

Public Transport Improvements

- The following buses are currently serving this corridor
 - 409 (1/hr) Selsdon to East Grinstead
 - 411 (Every half hour) Great Park to Caterham Railway Station
 - 567 St Bede School to Whyteleafe Tavern (one a day on a weekday)
- There are 6 bus stops within the vicinity of the proposed development. We would require works/contributions to make them fully accessible. Exact details to be discussed further between SCC and the Developer prior to final measures being agreed.
- The following improvements would be required at every bus stop in the vicinity of proposed development.
 - a) Bus stop pole, with Surrey County Council standard specification flag and timetable case
 - b) Raised boarding kerb -140mm high for length of at least 9m
 - c) Bus Shelter to Surrey County Council standard specification
 - d) Electrical supply for shelter lighting and RTPI)
 - e) Bus stop cage / clearway markings, with clearway plate to be provided on bus stop pole

- Bus stops near the proposal

Bus Stop Name	Road Name	Direction
Ninehams Road	Buxton Lane	SE
Ninehams Road	Buxton Lane	N
Salmons Lane Green	Salmons Lane West	W
Salmons Lane Green	Salmons Lane	NE
Whyteleafe Hill	Kenley Aerodrome	S
Whyteleafe Hill	Kenley Aerodrome	N

Construction Transport Management Plan

A Construction Transport Management Plan (CTMP) will need to be provided prior to the commencement of any approved works. This would be secured through a suitably worded planning condition.

Additional Advice

In addition to the above advice, I also refer you to guidance which is contained on our website, and the following link will direct you to a lot of the basic information needed to assist in the highway and transport consideration of many proposals.

<http://www.surreycc.gov.uk/environment-housing-and-planning/planning/transport-development-planning>

There are also references on that web site to other documentation and advice which may assist you in formulating a viable proposal.

Summary

Notwithstanding this advice, as you will be aware, the Highway Authority is a statutory consultee in the planning process, and the final decision on any planning application will be made by the Local Planning Authority.

If you would like to discuss this scheme further or feel there is something I have not covered, please do not hesitate to contact me.

Yours sincerely,

Angela Goddard

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APPENDIX 2 – SCC HERITAGE PRE-APPLICATION RESPONSE SEPTEMBER 2022

To: Nick Pond, Montagu Evans; David Stewart, Tandridge District Council

From: Historic Environment Planning: Historic Buildings

Application Number: Pre-application

Planning Officer: N/A

Designation: Setting of Grade II and Conservation Area

Date Consultation Received: 30/08/2022

Address: Former RAF Kenley, Victor Beamish Avenue, Caterham, CR8 5FX

Proposal: 88 new residential dwellings.



Comments:

The header shows that the historic environment considerations are the character and appearance of the Conservation Area and the setting of nearby listed buildings. Special regard has to be had to these matters in the determination of the application in accordance with sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

In line with paragraph 194 of the NPPF local planning authorities should require an applicant to describe the significance of any heritage assets affected by a proposal, including any contribution made by their setting. As a minimum the relevant historic environment record should be consulted. I am not aware that that historic environment record has been consulted as part of your proposal and would encourage you to do so before submitting an application to ensure the scheme is in line with national policy.

As the site is over 0.4 hectares there will be a requirement to carry out an archaeological desk based assessment as part of the application in line with local planning policy. I suggest you get advice on this from my colleague Nigel Randall who is the Archaeological Officer for Tandridge District Council. Nigel can be contacted at nigel.randall@surreycc.gov.uk. Please note my response does not relate to any buried archaeological heritage which will fall in the remit of the Archaeological Officer.

As part of your pre-application you have identified three built heritage assets which have the potential to be affected by this proposal. These are:

- The Grade II listed Former Dining Room and Institute at Former RAF Kenley (referred to as NAAFI Building henceforth)
- Kenley Aerodrome Conservation Area
- The non-designated Former Workshop Buildings

I consider this to be an accurate assessment of those built heritage assets which have the potential to be affected by this proposal. In line with paragraph 195 of the NPPF I have outlined the significance of the heritage assets below and any contribution made by their setting.

Conservation Area

The application site forms part of RAF Kenley, described by Historic England as one of the most complete fighter airfields associated with the Battle of Britain to have survived. The site was historically common land which was later taken under the Defence of the Realm Act during the First World War. The site was used to service aircraft during the First World War, a usage which continued in the interwar period when the site was expanded. There is a 'Kenley Aerodrome Conservation Area

Proposals Statement' (2006) adopted by both Croydon and Tandridge as a Supplementary Planning Document.

Very little survives of the early phase of the airfield in the application site. The only identifying feature is Victor Beamish Avenue which runs northwards from Salmons Lane West and has remained constant throughout the site's time as an airfield. Hangar buildings were built to the north of the application site during this period but have now all been demolished or destroyed. These hangars formed part of Area D highlighted in your heritage statement. Owing to the nature of these buildings as large structures erected purely for maintaining and storing aircraft, this area is currently a large open part of the site which few features indicating its former use. The most important aspects of this area are its association and link with the airfield (including the access road around this) and the Former Workshop Building, discussed below.

As part of this initial phase, troops were stationed in single storey huts to the south of the site. During the early 1930s the Air Ministry sought to expand its RAF aerodromes across the country. Between 1932 and 1934 a major phase of development took part at RAF Kenley and it is this which most strongly contributes to the character and appearance of the Conservation Area today. New buildings were built in blocks to the south of the airfield including the NAAFI Building, Former Officers Mess, Former Workshop Buildings and barracks. During this time the Air Ministry consulted the Royal Fine Arts Commission and architects such as Edwin Lutyens, Reginald Blomfield and Giles Gilbert Scott had an influence on the final designs. While it is unknown who designed the landscaping of the site, it is clear that this was given detailed consideration from maps and aerial photographs showing areas A, B and C highlighted in the heritage statement. This was very different to the plain layout of the single storey huts from the early airbase which did not have any of the paths, trees or planting which typified the 1930s redevelopment of the site. This landscaping is an important part of the Conservation Area's historic and architectural interest.

Area B was given the greatest consideration in terms of landscaping and consisted of a set of three barrack buildings which were between two or three storeys in height (it is unclear from aerial photographs). To its west the area was lined by a formal avenue of trees along Victor Beamish Avenue which were planted as part of the 1930s development. One of the barrack blocks faced directly toward the road showing that views along this avenue were considered important and were designed to contribute to a sense of place on arrival as the trees do today. The remaining buildings were in alignment with this block with the intermediate space set out as lawns punctuated by trees and footpaths. To the south was further open space which was utilised for the construction of barrack huts during the Second World War. A road ran to the north of these as a primary access route with paths running between the blocks linking it up with the wider site.

As part of this phase the NAAFI building (discussed below) and parade ground were also constructed and were a central feature of this area. They also feature the same well considered landscaping with trees forming a soft boundary around the parade ground creating a largely self-contained site. Access to this was via a set of paths to the east which makes up Area C. These continued toward the airfield and Officers Mess and formed an important pedestrian route through the site.

Area A was a more complicated mix of buildings which did not have the same careful planning of Areas B and C and had a much more formal appearance. The entrance to the site off Salmons Road West consisted of a pair of buildings and a gated entrance. The function of the building to the east (located in Area D) was likely the Wireless Telegraph and Radio Telegraphy building (listed as the WT and RT building in the 1945 plan) while that to the west was a Guard House which formed part of the entrance to the site. To the north of the Guard House were two temporary barrack buildings of little note and then a store, a post office and the SHQ (possibly Sector Headquarters) on the same alignment along Victor Beamish Avenue with formal footpaths. These gave some indication of the open character of the site, but more importantly its formality. Aerial photographs suggest these were one to two storeys in height with shallow pitched roofs. The area immediately to the north of the guard building does not ever seem to have had any use as part of the airbase except for temporary barrack buildings.

Overall, this formed a well-designed holistic scheme the open character, landscaping and layout of which gave the area a campus character for ordinary troops stationed at Kenley. As noted in the SPD, these aspects are still evident today and make a strong contribution toward the character and appearance of the Conservation Area as a well-designed scheme for a 1930s airbase. **These areas must not be dismissed as being of no interest.** The special historical and architectural interest of these areas as a former RAF base is particularly evident when compared to the former married quarters to the west of the site which were continually adapted, demolished and rebuilt during their time as part of airbase with very few features of note surviving in each iteration.

In terms of development, the site presents a great deal of potential to do something which not only preserves the character of the Conservation Area, but also enhances it. Views toward Area B are particularly important from Victor Beamish Avenue and any development here must be carefully designed to maintain this character. Thought must also be given to how the landscaping of the site can be reflected as part of the final design, in particular for the design of the circulation routes around the site. The development of Area A should reflect the formality of this space and opportunities to re-create aspects of the site, such as building a lodge building at the entrance, should be encouraged. The SPD makes clear that any new development should preserve the appearance of the area.

NAAFI Building

The NAAFI building is Grade II listed and was a purpose built canteen and entertainment complex for the ordinary military service personnel. The 'back of house' kitchen and support services were housed in the single storey sections to the north either side of a central courtyard, while the dining halls and entertainment areas are those to the south and on the first floor. The appearance of different areas within the building indicate how they were used.

The building was constructed as part of the Air Ministry's expansion of the site between 1932-4. As noted above, the design of such buildings was influenced by the Royal Fine Arts Commission in keeping with other RAF bases around the country. For this reason, the list entry makes clear 'the careful proportions of this building reflect the impact of Air Ministry consultation with the Royal Fine Arts Commission.' The architectural and historic significance of this building includes its use as part of a Battle of Britain airfield, elevational appearance, scale, use of materials, plan form and clear separation of the different functions within the building.

The setting of the building is strongly influenced by its central position in front of the Parade Ground where its imposing appearance can be appreciated as well as its symmetry. As noted above, it was located as part of a careful and well considered landscape design which allowed troops to circulate around the site along footpaths through Area C and also along Victor Beamish Avenue.

Former Workshops

The Former Workshop Buildings to the north are an undesignated heritage asset which were used historically as a machine shop and carpenter's workshop. The building forms part of Area D and did not have the same well landscaped surroundings which form areas A, B and C with the exception of a tree lined avenue to the east which provided access from the barrack blocks. Aerial photographs and maps show it dates from the alterations to the airbase in the 1930s.

The building has limited architectural interest but is of some historic interest as evidence of the former use of RAF Kenley. It makes a positive contribution to the character and appearance of the Conservation Area as evidence of the use of the site and its layout.

I am not aware that Tandridge have made any commitment toward the restoration of this building either as part of the local plan or part of the Conservation Area SPD, although it does say it is a priority to reconstruct the building. Since the publication of this document the building has clearly further deteriorated.

General Comments on Proposed Scheme

You have submitted proposals for 88 new dwellings across the site. My understanding from Tandridge is that these proposals should be guided by the draft local plan allocation HSG06. This allocation is for 75 homes on the site and includes the following site-specific policy requirements for conservation:

1. Development will conserve and enhance the Conservation Area and the setting of nearby heritage assets, including the listed building, Scheduled Monument and be considered in accordance with the Kenley Aerodrome Conservation Area Proposals Statement, or any subsequent update.
2. In keeping with the heritage value of the site and the principles of the Conservation Area, any scheme should focus development primarily to the northern area of the site and a sympathetic design, scale and layout must be demonstrated in any application.
3. All development proposals must be accompanied by a detailed heritage assessment.

In the first place, I am aware that no decision has been made by Tandridge yet on whether the site will entirely or partially be included in the final local plan. As such, please note that the comments contained in this letter are made at officer level without prejudice to any formal decision that may be made by Tandridge District Council. I have only dealt here with the impacts on the built designated and undesignated built heritage assets and any other matters fall to Tandridge to respond to. They are also entitled to disregard my advice should they have sufficient justification, such as evidence which demonstrates why leaving spaces undeveloped contributes to the character and appearance of the Conservation Area.

I am also aware that Tandridge have advised against submitting an outline only scheme for the site, which I support owing the fact there is the potential to cause a great deal of harm to a Conservation Area, listed building and a non-designated heritage asset. All of this will need to be weighed as part of an overall scheme and it will not be possible to get a full understanding of the impact of this from only considering the layout of the site. Please do bear in mind that at the current time it has not been demonstrated that any housing allocation for this site is acceptable as no independent heritage assessment has been submitted for the site which justifies the housing numbers.

The site specific policy requirements make clear that this should be a heritage led scheme which should properly analyse the development of the site and attempt to identify those aspects which reveal the character and appearance of the Conservation Area and the setting of other built heritage assets. While I consider there are some positive aspects of your proposals, at the current time I am unconvinced that any thorough analysis of how the site developed has been carried out nor any attempt made to identify what aspects of this contribute to its significance. While I am pleased that that your intention is to draw on the rich heritage of the Site and the wider RAF Kenley complex much more work is needed to ensure the scheme will not result in an unacceptable level of harm, particularly in Area B. My opinion is that this needs a much more detailed consideration to ensure the granularity of some aspects of the scheme are revised before a full application is submitted. To assist with this I have given quite a thorough set of comments above on the development of the site in order to assist the development of the scheme, but this does not fundamentally change the fact that there is more work to be done on this element prior to submitting an application.

I also note that you are submitting 13 more homes than in the original site allocation. I am concerned that this has created an unnecessarily cramped appearance in parts of the site and represents over development. Having reviewed the proposals, I consider it is not possible to build this many dwellings without causing unacceptable harm to the character and appearance of the Conservation Area. I have highlighted below where I consider some of these dwellings need to be removed in order to prevent harm to the open character of the Conservation Area. Tandridge may make further specific requests over the housing allocation which I leave to them to discuss with you.

I have split my comments on the scheme itself into the four areas identified by Croydon Borough Council (A, B, C and D) set out on page 10 of your heritage statement. If you wish to provide your own subdivision of this at a later date, please by all means do, but for the purpose of assessing this pre-application this is the easiest way to provide comments.

Area D

I am of the opinion that Area D is one of the most well considered elements of the scheme. Aside from the Former Workshop (discussed below) there is very little left of this part of the site and as a result there is greater potential for change, provided this change fits in with the overall landscaping of the site. Being able to understand its relationship with the airfield is highly important as well as the link with the remainder of the site.

The proposed view toward the NAAFI building is a particularly positive feature. For the scheme to succeed it is vital that Area D be understood as relating to and be accessible from the airfield itself. More recent schemes (prior to Conservation Area designation) have separated housing from the airfield with brick boundary walls and this has prevented the Conservation Area from being considered holistically. The buildings toward the north of the site should have their principal elevations facing toward the airfield.

In terms of materials, I note that many of the buildings are currently shown with slate roofs. I would strongly encourage a clear palette of materials which gives the development a strong sense of place. This was achieved very successfully in Caterham Barracks where stock brick and slate roofs were used similar to the existing buildings, but the height, form and decoration of buildings was varied to bring relief to the site. I consider this should be possible at RAF Kenley.

The scheme will lead to the loss of the undesignated Former Workshop building. I will recommend a level 3 or 4 recording condition on this building which will need to interpret the structure, provide drawings of its layout and elevations and photographs of the building as a whole as well as any specific features of note. The demolition of the building will be considered a degree of harm to the Conservation Area and will need to be weighed against any heritage benefits for the site. I note you have a small garden feature to the north and I would recommend you give some consideration to a commemorative or other feature which demonstrates the link of the site toward the airfield and contributes to the sense of place. You may wish to engage with the Kenley Revival group as part of this. Interpretation on this area of the site would also be welcomed. For clarity, such a feature would not entirely outweigh the harm of the loss of the Former Workshop Building.

As the loss of the Former Workshop building will represent harm, it is highly important that other areas of the development represent high design standards which reflect the character and appearance of the Conservation Area. Should it not be possible to design these in such a way which reflects the development of the airbase, then it may be preferable to revisit either converting or rebuilding the workshop building. If other aspects of the proposal also result in harm then, taking into account the loss of the Former Workshop buildings, there is the potential for the scheme to balance unfavourably and there be grounds for refusal.

While there are many positive aspects to the design of Area D, I am concerned about the proposed parking bays to the north and east of the site which appear isolated and interrupt the green spaces which link the site with the airfield and pedestrian footpaths. Having reviewed the site allocation it is quite clear that this is an issue with the over-development of the site and I would strongly encourage you to lower the number of dwellings in Area D to free up more space for car parking. In particular removing three dwelling block at the south-east corner of the site (within the road) and re-orientating the remaining block would appear to provide at least 8 spaces which would go some way to resolving this issue. Should the scheme be submitted for this area as it is currently then I would consider the parking to harm the openness which contributes the character and appearance of the Conservation Area. Taking into account that your scheme is already 13 dwellings over the site allocation I do not think this request is unreasonable. You may wish to discuss further with Tandridge if there is any scope to remove any of the additional parking spaces around the edge of the site.

A lot of thought will be required as to how the boundaries will appear throughout the site. There is a danger that much of route around Area D will become defined by boundary walls, particularly on approach by car. If access could be provided to the properties at the west of the area from Victor Beamish Avenue and these re-orientated then I would consider this a significant improvement to the scheme. I appreciate this element is currently out of your control, but mention it in case access could be obtained from the MOD which would make this a more acceptable development. This would be of benefit to all parties involved as the current scheme will have quite an unpleasant effect on the northern part of Victor Beamish Avenue which will be defined by brick boundary walls on either side and create an unpleasant tunnelling effect. Tandridge may wish to comment on this further.

Area C

The current proposal will see Area C retained as landscaping as part of the development. I would agree with this principle as the aerial photographs show this was important to circulation routes through the airbase when it was in operation. It is vital that a landscape led approach is taken for this area and in particular how it links with Areas B and D. This is the reason that I would strongly encourage you to remove the parking from the eastern side of Area D.

Area A

As noted in my general comments I am disappointed that a more thorough assessment of how the character and appearance of this part of the site has not been produced nor consideration of what could be done to preserve and enhance it. In particular identifying what kind of buildings were located here (e.g. lodges at the entrance, stores etc), how they were laid out within their plot, scale and (if possible) their appearance. The current proposal does not reflect in any way the character of this part of the site as an airbase and as such I consider the design unjustified.

I would urge you to look again the formality of this space and consider what could be done to reflect its layout. With the exception of the crescent to the south, I consider the remaining buildings should be on the same alignment with formal paths and driveways indicating their usage. Separate garages should be discouraged with the dwellings having the appearance of individual blocks. These should be subservient to the site as a whole and should not be more than two storeys with a shallow pitched roof with any boundaries for these buildings should appear as hedges. For clarity, I am not asking you to produce a pastiche of the original buildings. This should represent an exciting opportunity for your architect to look at producing some top quality design which nods to the history of the site.

I would encourage you to consider a lodge type dwelling at the entrance to the site to indicate a sense of arrival into the airbase. I recognise the crescent is in an area of land which was only ever used for temporary barrack huts but should the opportunity become available, I would still encourage you to incorporate this into the site better. Tandridge may have some better suggestions for how to improve this area of the site.

Area B

I have the greatest concerns about Area B. Historically, this was an open landscaped area with accommodation located in three barrack blocks. As a result, the well landscaped space around these had an open communal use for troops to make use of while resting. I am concerned that the current proposals do not in any way consider the importance of this to the character and appearance of the Conservation Area. Currently there are views out toward this open space through the trees on Victor Beamish Avenue.

At the current time I do not think the right approach has been taken for this area and would encourage you to revisit it entirely. This should be a landscape and heritage led scheme which takes into consideration both the appearance of the area historically and today. Thought should be given to the connectivity of this area with the rest of the site and to reflecting the openness of this part of the Conservation Area. In particular, it is highly important that any buildings along Victor Beamish Way front the highway and contribute to the sense of place. Ideally, this location lends itself to apartments with the area around such dwellings set out for communal space in a campus setting. I suggest this,

along with the concerns raised by Croydon and Sport England are considered and a decision made as to whether it is worth proceeding with developing this part of the site. If the spirit of the original airbase can be achieved then it would have my support although ultimately this is something which Tandridge will need to consider further.

Should you decide to proceed with trying to subdivide this part of the site against my advice, then I would have to consider the impact of this scheme on the openness of the site and being able to interpret it as part of the former airbase. Aspects which I consider would cause harm would be the boundary walls throughout the site, the poor connectivity with the rest of the airbase, the location of parking bays, harm to views from Victor Beamish Way and the cramped appearance of the site. I consider this, along with the loss of the Former Workshop buildings, would represent clear grounds for refusal owing to harm to the character and appearance of the Conservation Area and the setting of the listed building. Reconsidering the location of the block along Victor Beamish Avenue, improving connectivity with the southern part of the site with well landscaped footpaths and reducing the number of units and their parking bays could go some way to improving the scheme, but I am not wholly convinced it would entirely negate this harm. Taking a more landscape and heritage led approach to Area B would be the most appropriate way to proceed.

I hope the above is informative as a way forward. I remain of the opinion that a sensitive and well considered scheme could be achieved on this site, but it will need to pay close attention to the character and appearance of the area. While there are many positive aspects of your scheme, as noted above there are some areas where a lot of further thought is required as to the development of the airbase and those aspects which make a positive contribution to understanding its character and appearance. In particular, I would strongly encourage you to reconsider your approach to Area B which at the current time has the potential to cause a great deal of harm to the Conservation Area.

I remain happy to engage with any amendments to the proposals should you have any further enquiries.

Signed: Chris Reynolds

Date: 02/09/2022

File Ref: 32/10/Gen

For the Director for Community Protection, Transport & Environment

APPENDIX 3 – PROPOSED SITE LAYOUT PLAN REV C



W



Coloured Site Layout
Kenley Campus, Caterham-on-the-Hill

21125 / C104C

Scale 1:500 @ A0 December 2023

APPENDIX 4 – ORIGINAL SCC HERITAGE CONSULTATION RESPONSE

From: Christopher Reynolds <Christopher.Reynolds@surreycc.gov.uk>
Sent: 15 September 2023 19:42
To: Sean Scott
Cc: Statutory
Subject: 2023/878 Kenley Aerodrome
Attachments: 2023'878 Kenley Aerodrome, Victor Beamish Avenue.doc

Dear Sean,

Please find attached our comments on 2023/878 Kenley Aerodrome.

Kind regards,



Chris Reynolds
Senior Historic Buildings Officer

Historic Environment Planning, Surrey County Council, Quadrant Court, 35 Guildford Road,
Woking, GU22 7QQ

Tel: 07790 952958*



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To: Planning Department of Tandridge District Council

From: Historic Environment Planning: Historic Buildings

Application Number: TA/2023/878

Date Consultation Received: 07/09/2023



Address: Kenley Aerodrome, Victor Beamish Avenue, Caterham, Surrey, CR3 5FX

Proposal: Development of the site for 87no. residential dwellings including 40% affordable housing, associated landscaping, amenity space and car parking (outline application all matters reserved aside from access) (This is a major planning application and a Departure from the Development Plan. The site is located within the Kenley Aerodrome Conservation Area, it affects the setting of Listed Buildings, and affects the Setting of Scheduled Monuments)

Designation: Grade II Listed Building and Conservation Area

Comments:

The header shows that the historic environment considerations are the character and appearance of the conservation area and the setting of nearby listed buildings. Special regard has to be had to these matters in the determination of the application in accordance with sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

The applicant has provided a heritage statement to meet the requirements of paragraph 194 of the NPPF. In line with paragraph 195 I have provided further comments below.

There are three built heritage assets which have the potential to be affected by this proposal. These are:

- Kenley Aerodrome Conservation Area
- The Grade II listed Former Dining Room and Institute at Former RAF Kenley (referred to as NAAFI Building henceforth)
- The non-designated Former Workshop Buildings

Conservation Area

The application site forms part of RAF Kenley, described by Historic England as one of the most complete fighter airfields associated with the Battle of Britain to have survived. The site was historically common land which was later taken under the Defence of the Realm Act during the First World War. The site was used to service aircraft during the First World War, a usage which continued in the interwar period when the site was expanded. There is a 'Kenley Aerodrome Conservation Area Proposals Statement' (2006) adopted by both Croydon and Tandridge as a Supplementary Planning Document. The entire application site falls within Sub-Area 2 of the SPD.

Very little survives of the early phase of the airfield in the application site. The only identifying feature is Victor Beamish Avenue which runs northwards from Salmons Lane West and has remained constant throughout the site's time as an airfield. Hangar buildings were built to the north of the application site during this period but have now all been demolished or destroyed. Owing to the nature of these buildings as large structures erected purely for maintaining and storing aircraft, this area is currently a large open part of the site which few features indicating its former use. The most important aspects of this area are its association and link with the airfield (including the access road around this) and the Former Workshop Building, discussed below.

As part of this initial phase, troops were stationed in single storey huts to the south of the site. During the early 1930s the Air Ministry sought to expand its RAF aerodromes across the country. Between 1932 and 1934 a major phase of development took part at RAF Kenley and it is this which most strongly contributes to the character and appearance of the conservation area today. New buildings were built in blocks to the south of the airfield including the NAAFI Building, Former Officers Mess, Former Workshop Buildings and barracks. During this time the Air Ministry consulted the Royal Fine Arts Commission and architects such as Edwin Lutyens, Reginald Blomfield and Giles Gilbert Scott had an influence on the final designs. While it is unknown who designed the landscaping of the site, it is clear that this was given detailed consideration from maps and aerial photographs shown in the statement of significance – I have included a photograph below so it is clear to what I am referring. This was very different to the plain layout of the single storey huts from the early airbase which did not have any of the paths, trees or planting which typified the 1930s redevelopment of the site. This landscaping is an important part of the conservation area's historic and architectural interest as are the communication routes throughout the site.

The area to the south was given the greatest consideration in terms of landscaping and consisted of a set of three barrack buildings which were between two or three storeys in height (it is unclear from aerial photographs). To its west the area was lined by a formal avenue of trees along Victor Beamish Avenue which were planted as part of the 1930s development. One of the barrack blocks faced directly toward Victor Beamish Road showing that views along this avenue were considered important and were designed to contribute to a sense of place on arrival. The remaining buildings were in alignment with this block with the intermediate space set out as lawns punctuated by trees and footpaths. A road ran to the north of these as a vehicular access route.

As part of this phase the NAAFI building and parade ground were constructed and were a central feature of this area. Both the building and parade ground have the same well considered landscaping with trees forming a soft boundary creating a largely self-contained site. Access between the barrack blocks and NAAFI building were via a set of paths to the east which functioned as a circulation route throughout the whole airfield. These footpaths provided access from the southern end of Victor Beamish Avenue all the way to the airfield and Officer's Mess to the north.

The area to the west of Victor Beamish Avenue was a more eclectic mix of buildings which instead had a much more formal linear appearance. The entrance to the site off Salmons Road West consisted of a pair of buildings and a gated entrance. Aerial photographs suggest these buildings were one to two storeys in height with shallow pitched roofs.

Overall, this formed a well-designed holistic scheme the open character, landscaping and layout of which gave the area a campus character for ordinary troops stationed at Kenley. As noted in the SPD, these aspects are still evident today and make a strong contribution toward the character and appearance of the Conservation Area as a well-designed scheme for a 1930s airbase. These areas must not be dismissed as being of no interest. The special historical and architectural interest of these areas as a former RAF base is particularly evident when compared to the former married quarters to the west of the site which were continually adapted, demolished and rebuilt during their time as part of airbase with very few features of note surviving in each iteration.

NAAFI Building

The NAAFI building is Grade II listed and was a purpose built canteen and entertainment complex for the ordinary military service personnel. The 'back of house' kitchen and support services were housed in the single storey sections to the north either side of a central courtyard, while the dining halls and entertainment areas are those to the south and on the first floor. The appearance of different areas within the building indicate how they were used.

The building was constructed as part of the Air Ministry's expansion of the site between 1932-4. As noted above, the design of such buildings was influenced by the Royal Fine Arts Commission in keeping with other RAF bases around the country. For this reason, the list entry makes clear 'the careful proportions of this building reflect the impact of Air Ministry consultation with the Royal Fine

Arts Commission.' The architectural and historic significance of this building includes its use as part of a Battle of Britain airfield, elevational appearance, scale, use of materials, plan form and clear separation of the different functions within the building.

The setting of the building is strongly influenced by its central position in front of the Parade Ground where its imposing appearance can be appreciated as well as its symmetry. As noted above, it was located as part of a careful and well considered landscape design which allowed troops to circulate around the site along footpaths and also along Victor Beamish Avenue.

Former Workshops

The Former Workshop Buildings to the north are an undesignated heritage asset which were used historically as a machine shop and carpenter's workshop. The building did not have the same landscaped surroundings as the former barrack blocks with the exception of a tree lined avenue to the east which formed part of the circulation routes throughout the whole airfield. Aerial photographs and maps show the building dates from the alterations to the airbase in the 1930s.

The building has limited architectural interest but is of some historic interest as evidence of the former use of RAF Kenley. It makes a positive contribution to the character and appearance of the conservation area as evidence of the use of the site and its layout. Such a contribution is limited as the building is derelict.

I am not aware that Tandridge have made any commitment toward the restoration of this building either as part of the local plan or part of the Kenley Aerodrome Conservation Area Proposals Statement, although it does say it is a priority to reconstruct the building. Since the publication of this document, the building has clearly further deteriorated.



Figure 1: 1961 Aerial photograph of RAF Kenley showing the arrangement of buildings, open spaces, trees, roads and paths.



Figure 2: 1960s Aerial photograph of RAF Kenley showing the arrangement of buildings, open spaces, trees, roads and paths.

Site Allocation

The proposal is for 87 new dwellings across the site with all matters reserved except access. It should be noted that just because the site is a conservation area, it does not mean that Kenley Aerodrome is incapable of redevelopment. Paragraph 206 of the NPPF makes clear that local planning authorities should look for opportunities for new development within conservation areas to enhance or better reveal their significance. Proposals that preserve those elements which make a positive contribution to the asset or better reveal its significance should be treated favourably.

At the time of my comments, I understand there is a possibility the local plan could be withdrawn. I am also aware that the local plan inspector had questioned the evidence basis for this site. Regardless, I have given consideration to draft local plan allocation HSG06. This allocation is for 75 homes on the site and includes the following site-specific policy requirements for conservation:

1. Development will conserve and enhance the conservation area and the setting of nearby heritage assets, including the listed building, Scheduled Monument and be considered in accordance with the Kenley Aerodrome Conservation Area Proposals Statement, or any subsequent update.
2. In keeping with the heritage value of the site and the principles of the conservation area, any scheme should focus development primarily to the northern area of the site and a sympathetic design, scale and layout must be demonstrated in any application.
3. All development proposals must be accompanied by a detailed heritage assessment.

The site specific policy requirements make clear that this should be a heritage led scheme which should properly analyse the development of the site and attempt to identify those aspects which reveal the character and appearance of the conservation area and the setting of other built heritage assets.

General Comments

The scheme before us has all matters reserved except the fact it is for 87 houses and the access has been provided. I have engaged in quite substantial pre-application discussion with the applicant. While I am pleased that they have taken on board quite a lot of my comments, there are some areas

of the scheme where I remain uncomfortable and consider further work is required. In particular, I remain concerned that the number of units (which is 12 over the allocation) is still too high and that there are areas which suffering from overdevelopment as a result. I have made this clear below.

Owing to the nature of the application, the applicant will still need to submit details for the appearance, access, landscaping, layout and scale of buildings on the site. As such, I have only taken into account here those matters which specifically relate to the access of the site and the number of dwellings. I have split my comments into the northern area (the area immediately to the north of the NAAFI building), the western area (the units to the west of Victor Beamish Road) and the southern area (the units to the south of the NAAFI building).

Northern Area

I am of the opinion that the northern area is one of the most well considered elements of the scheme. Aside from the Former Workshop (discussed below) there is very little left of this part of the site and as a result there is greater potential for change, provided this change fits in with the overall landscaping of the site. Being able to understand its relationship with the airfield as well as the link with the remainder of Sub Area 2 are highly desirable elements.

The proposed view toward the NAAFI building is a positive feature of the scheme. For the scheme to succeed it is vital that the northern area be understood as relating to and be accessible from the airfield itself. More recent schemes (prior to conservation area designation) have separated housing from the airfield with brick boundary walls and this has prevented the conservation area from being considered holistically. The buildings toward the north of the site should have principal elevations facing toward the airfield. I do not think the scheme precludes this, but I wish to make it clear now for future reference.

The scheme will lead to the loss of the undesignated Former Workshop building. A building recording condition to level 3 which will be needed to interpret the structure, provide drawings of its layout and elevations and photographs of the building as a whole as well as any specific features of note in line with paragraph 205 of the NPPF. In terms of the impact of its demolition, this should be considered harm to an undesignated heritage asset through its total demolition and harm to the conservation area from the loss of a building which makes a positive contribution to understanding its historic association. It should be noted that even though the building makes a positive contribution to the conservation area, its loss should not be considered substantial harm because of its dilapidated state as I have set out above.

The heritage statement makes note of the fact the garden area to the north has the “potential to accommodate commemorative features, artwork and /or sculpture, in response to the site’s history and its contribution to World War II.” I would consider this to be a heritage benefit, but at present cannot find it on any of the drawings and am not convinced it would be enforceable should the applicant decide not to proceed with this element. I have suggested a condition below which I would encourage you to discuss with the applicant. For clarity, such a feature would not entirely outweigh the harm of the loss of the Former Workshop building. As the loss of the Former Workshop building represents harm, it is highly important that other areas of the development reflect the character and appearance of the conservation area to ensure the scheme balances properly.

I previously raised concerns with the applicant about the location of parking bays in this area and suggested they omit one of the units to accommodate these elsewhere. From what I understand most of these bays have just been removed from the scheme. Should Tandridge be opinion that there are not enough parking bays in this area, then consideration should be given to removing a small number of the units rather than trying to insert these within any areas of proposed landscaping. I leave you to consider whether the number of units and access would result in the overdevelopment of the northern area.

Western Area

The proposals for the western area of the site are well considered and have responded to concerns I raised about the alignment of buildings in this location. As can be seen in figures 1 and 2 the buildings reflect the historic linear appearance of the buildings which faced directly on to Victor Beamish Avenue. I only wish to note here that the applicant has responded to my concerns. I will have to consider the design of these buildings as part of the reserved matters stage.

Southern Area

Historically, this was an open landscaped area with accommodation located in three barrack blocks. As a result, the well landscaped space around these had an open communal use for troops to make use of while resting with footpaths connecting all of the area with the airfield to the north. The aerial photographs also show that one of the barrack blocks faced directly on to Victor Beamish Avenue to create a sense of place. Owing to the existing open space, this location lends itself to apartments with the area around such dwellings set out for open space in a campus setting. Any building on Victor Beamish Avenue should have its principal elevation facing the highway owing its status as a gateway and there should be good connectivity throughout the area with the rest of the airbase.

I am disappointed that the current scheme does not adequately respond to the character and appearance of this area. While I consider some of the elements to be an improvement based on what I have previously seen, the end result is a scheme that would see the southern part of the site largely perceived as views of boundaries, car parking and flank elevations rather than well considered open spaces and good quality placemaking. Not only have I raised concerns about this before, but the importance of these elements to understanding the character and appearance of the conservation area are outlined in sections 2.2.11 (boundary treatments) and 2.2.12 (trees and landscape) of the aforementioned SPD. It is even more disappointing that these elements have been missed off page 10 of the Design and Access Statement. Taking this all into account I consider the scheme will see the removal of all character from this part of the conservation area, with the exception of the trees along Victor Beamish Avenue.

At present I am of the opinion there are good heritage grounds for refusal and am content that all of these issues I have raised relate to either the number of units or proposed access throughout the site. I am not in principle against developing this part of the site, but I do think more effort is needed if Tandridge wish to show they have given special regard the preservation of the conservation area. If it proves too complicated, the applicant may be better to remove this element of the scheme entirely.

If we are going to accept the subdivision of this area, then more consideration should be given to the following:

- The circulation routes through the southern area are poor with the footpath limited to just the south of the school site (221125/C05). The whole of this area is a fundamentally important part of the airbase as shown in the aerial photographs and should not be shut off from the rest of the conservation area. There needs to be much better connection from Victor Beamish Avenue through the southern part of the site toward the airfield. This would also improve pedestrian access to the houses at the southern end of the area.

As this is a means of access it needs to be resolved at this stage in the application, not at a later date. If the applicant has to remove units to accommodate this, it should be remembered the scheme as it stands is still 12 units over the original allocation. I suspect it may be possible without removing any units at all as sections of the proposed highway can be used.

- As it stands, the scheme will see the loss of views of open space from Victor Beamish Avenue within conservation area. While there is inevitable harm from this, I would encourage the applicant to look at opening up views from the southern end of Victor Beamish Avenue toward the green open space in the centre of the area.

- The approach to the site from the north will largely consist of a view toward the boundary of plot 10. I consider this to significantly detract from the open space of within the area. I would much prefer this unit to be removed or relocated elsewhere. Again, the removal of this unit would also present an opportunity to provide a view toward the open space at the centre of the site. Should the applicant consider this a layout matter they should show this unit could be relocated elsewhere, otherwise the number of units should be reduced.
- My greatest concern relates to plots 2-9. Victor Beamish Avenue is a gateway into the conservation area and it is vital that the principal elevation of these buildings faces directly on the highway. At present the plans show this will consist of boundary treatments. While I appreciate this is difficult to resolve because of the parking, it does not mean we should just accept quite a serious element of harm. I would encourage the applicant to look at some of the solutions used at Caterham Barracks.

It may be the case that the applicant would prefer to deal with this under reserved matters but I am concerned that we may find ourselves with an unworkable scheme in a couple of years' time where the entire proposal needs to be redrawn. I would much rather this be resolved now.

I have assessed the proposal in accordance with paragraphs 195 and 199 of the NPPF. At present I consider there is harm to Kenley Aerodrome Conservation Area and the setting of the Grade II NAAFI building. This harm is from the loss of the Former Workshop buildings, the loss of open space, permanent loss of circulation routes and the poor design of the gateway into the conservation area. There is also a high degree of harm to the Former Workshop Buildings as a non-designated heritage asset. The heritage benefits put forward are providing a better view toward the NAAFI building and providing a commemorative feature on the site. Taking these into account, I consider there is a residual high degree of less than substantial harm which will need to be weighed against the public benefits of the scheme under paragraph 202 of the NPPF along with harm to the non-designated heritage asset under paragraph 203 of the NPPF.

I have set out above what needs to be considered to try and improve the overall impact of the scheme. I do not consider this to be unachievable nor am I averse to negotiation should alternatives come to light. However, there does need to be something put forward here because the alternative is the total loss of an important part of a designated heritage asset.

Should you disagree, please apply the following conditions:

1. Prior to the commencement of the works a scheme for the recording of existing architectural and historic features affected by the works shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall thereafter be implemented as approved.

Reason: The Local Planning Authority is satisfied that it is fundamental to the development permitted to address this issue before development commences and that without this safeguard planning permission should not be granted, and to record the architectural and historic fabric of the building in accordance with the advice of paragraph 205 of the National Planning Policy Framework.

2. Prior to the commencement of works details of the commemorative feature, artwork and /or sculpture; a timescale for their implementation; and their proposed locations shall be submitted and approved in writing Local Planning Authority. The scheme shall thereafter be implemented as approved.

Reason: To ensure that the development hereby permitted is not occupied until the specified operations have been completed in the interests of the amenities of the area.

APPENDIX 5 – TDC TREE OFFICER CONSULTATION RESPONSE

Tandridge District Council

Planning

Tree Consultation Response

Case Officer: Peter Lee

From: Alastair Durkin
17th October 2023

Application Ref: 2023/878

Date: Revised in red
06/03/2024

Site address: Kenley Aerodrome, Victor Beamish Avenue, Caterham, Surrey, CR3 5FX

1.0 Instructions

1.1 To provide comments in relation to the impact on trees and the provision for soft landscaping.

2.0 Policy background and statutory protection

2.1 Thank you for consulting me. I visited the site recently and inspected the trees shown to be removed, cross checking against the submitted tree survey. I have summarised the relevant local policies below. The Trees and Soft Landscaping SPD also expands on them further.

2.2 You will also be aware that the site is located within the Kenley Airfield Conservation Area, and is almost entirely encompassed by Tree Preservation Order No. 2, 1999, which is an 'area' order covering all the trees that were present on 16th April 1999 when the order was made.

Core Strategy

- *CSP18 Character and Design - Development should have regard for the retention of important trees.*
- *CSP21 Landscape and Countryside - Development is required to conserve and enhance landscape character.*

Detailed Policies Document

- **DP7 General Policy for New Development - Paragraphs 12 (Landscaping) & 13 (Trees):**
 - *Provision to be made for the retention of existing trees that are important by virtue of their significance within the local landscape.*
 - *Their significance may be as a result of their: Size, form, maturity, or because they are rare or unusual.*
 - *The proposal ensures that landscaping is an integral element in layout design, making provision for suitable new planting, trees and boundary treatments to enhance the appearance, character and amenity of the site from the outset.*
- **DP19 Biodiversity, Geological Conservation & Green Infrastructure:**
 - *Where a proposal is likely to result in harm to ancient woodland or veteran trees the granting of planning permission will be wholly exceptional.*
 - *Benefit of the development must clearly outweigh the loss.*

- *Impact or loss should not just be mitigated, but overall ecological benefits should be delivered.*

3.0 Evaluation

- 3.1 I have considered the submitted plans and the Arboricultural Impact Assessment prepared by Barrell Tree Consultancy and I have several significant concerns, particularly in relation to specific trees, but also to the scale of tree losses overall.
- 3.2 Currently the Arboricultural Impact Assessment shows ~~55~~ 50 individual trees and tree groups/partial groups to be removed to facilitate development. This equates to far more trees than ~~55~~ 50 individual trees, however. Helpfully the Proposed Site Layout – Tree Removal plan (Drg No. P110) produced by OSP appears to have established the actual quantity of trees to be removed as being 132, out of 270 – nearly 50% of the total tree cover. No assessment of canopy cover loss has been calculated at this stage.
- 3.3 I have also considered the results of the tree survey and I do not agree with all the conclusions of the tree quality categorisation. Whilst it is fair to say that the BS5837 categorisation method is subjective and open to some interpretation by arboriculturists, it is also important to ensure that agreement as to the relative quality and longevity of trees can be reached, as this can affect how the impact of the development on the tree population is perceived by decision making non-arboriculturists.
- 3.4 A BS5837:2012 ‘A’ category tree is defined within Table 1 of the standard as *Trees of high quality with an estimated remaining life expectancy of at least 40 years.* A ‘B’ category tree is a tree of moderate quality with an estimated remaining life expectancy of at least 20 years. A tree might be downgraded from ‘A’ to ‘B’ because of impaired condition (e.g. presence of significant though remediable defects, including unsympathetic past management and storm damage), such that they are unlikely to be suitable for retention for beyond 40 years; or trees lacking the special quality necessary to merit the category A designation. Paragraph 4.5.6 states: ***Trees of generally high quality and/or value which have a defect or defects that do not reduce their retention span below the suggested 40-year threshold, should be placed in category A, i.e. they should not be downgraded as a result of minor imperfections.***
- 3.5 There are several trees within the survey where I consider the categorisation has erred from the BS5837 guidance. In fact, of the 270 trees surveyed, only 7 trees have been given the BS5837 ‘A’ category, which is an unusual ratio for a large tree population. However, I will concentrate my comments on those to be removed, where I consider the greatest amenity loss will be realised. I also have concerns regarding the assessment of the impact of these removals.
- ~~3.5.1 T87 Lime (Figure 1 overleaf) – Given a ‘B’ category, with no sub-category identified (which errs from BS5837 guidance). No minimum life expectancy has been given, but as the tree is healthy with no defects other than ‘tight forks’ observed, there is no reason why the tree should not live far more than 40 years, particularly with good practice management. The tree is very prominent within the local landscape, and I would give the tree a BS5837 category of ‘A’ sub cat 2, due to its high quality, estimated remaining life expectancy exceeding 40 years, and for its visual importance as a landscape feature. No retained.~~



Figure 1 - T87 Lime as viewed from the aerodrome access and parking off Victor Beamish Avenue

3.5.2 ~~G123 4 x London Plane (Figure 2) – All four trees within this cohesive group have been given a ‘B’ category, with no sub-category identified (which errs from BS5837 guidance). No minimum life expectancy has been given, but as the trees are clearly only in their mid-life stage with no significant defects observed, there is no reason why they should not live far more than 40 years, particularly with good practice management, such as the creation of secondary pollard points – all four trees being ‘lapsed pollards’ – trees that were reduced to the main stem many years ago and then left to grow without further significant crown management. They are trees of high quality and very visually prominent when viewed from Victor Beamish Avenue and surrounding properties within Rosebriars and Hillhurst Gardens. I would give these trees a BS5837 category of ‘A’ sub-cat 1/2. Now retained.~~



Figure 1 – G123 group of 4 x London Plane trees (arrowed) as viewed from Victor Beamish Avenue

3.6 ~~There are certainly areas within the proposed layout where trees of good quality have been retained (V129 a veteran Field maple, for example) but considering the very high number of tree removals required to accommodate the proposal, I would expect T87 and G123 to have been accommodated and made features of the development. Indeed, as trees of importance they should be designed into the proposal to be policy compliant. I acknowledge that this is an outline application, with all matters reserved apart from access, but aside from the large number of lower quality tree losses, which cumulatively will also have a very negative impact on the landscape and the character of the conservation area, it must be acknowledged at this stage that the loss of T87 and G123 in particular is not acceptable. Whilst T87 and G123 have now been shown as retained, and this is a very positive step forward, it must also be acknowledged that the large number of lower quality tree losses, will cumulatively have a very negative impact on the landscape and the character of the conservation area. It will no doubt~~

be a consideration within the planning balance as to whether this impact is acceptable in the context of the development as a whole.

- 3.7 In terms of the provision for soft landscaping I am reasonably satisfied that sufficient space has been provided for new planting. However, not to a degree that would in any way make up for the huge tree losses, particularly as there is unlikely to be a great deal of space to accommodate larger species trees. I would suggest that in any detailed application further provision is made for large species tree planting, with adequate space to mature both above and below ground. Planting on frontages will also be important, in pursuance of paragraph 131 of the NPPF which requires all new streets to be tree lined unless there are clear, justifiable and compelling reasons why this would be inappropriate.

4.0 Conclusions & Recommendations

- 4.1 ~~With all the above in mind I am of the view that in its current form the application fails to recognise the constraints imposed by the most important existing trees, which are important by virtue of their significance within the local landscape, contrary to Policy DP7 of the Tandridge Local Plan Part 2: Detailed Policies 2014, Policy CSP18 of the Tandridge District Core Strategy 2008, and Key Consideration 2 and 4 of the Tandridge District Trees and Soft Landscaping Supplementary Planning Document.~~ I am very glad to see that T87 and G123 have now been retained in the indicative layout, and as such I have no specific objections in terms of the principle of development against the loss of important individual trees, considering the outline nature of the application with all matters reserved save for access. However, I do remain concerned with regards to the volume of tree losses overall, and consideration should therefore be given to my comments at 3.7 above regarding scope for tree planting, and whether on a broader scale the character of the conservation area will be negatively affected.

Alastair Durkin BSc (Hons) MICFor FArborA
Principal Tree Officer
Planning Development Management
Tel: 01883 732863

adurkin@tandridge.gov.uk

APPENDIX 6 – REVISED SCC HERITAGE CONSULTATION RESPONSE



From: Christopher Reynolds <Christopher.Reynolds@surreycc.gov.uk>
Sent: 14 February 2024 18:22
To: Peter Lee
Cc: Statutory
Subject: 2023/878 Kenley Aerodrome
Attachments: 2023'878 Kenley Aerodrome, Victor Beamish Avenue (2).docx

Dear Peter,

Please find attached our revised comments on 2023/878 Kenley Aerodrome.

Kind regards,



Chris Reynolds
Senior Historic Buildings Officer

Historic Environment Planning, Surrey County Council, Quadrant Court, 35 Guildford Road,
Woking, GU22 7QQ

Tel: 07790 952958*

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To: Planning Department of Tandridge District Council

From: Historic Environment Planning: Historic Buildings

Application Number: TA/2023/878

Date Consultation Received: 01/02/2024



Address: Kenley Aerodrome, Victor Beamish Avenue, Caterham, Surrey, CR3 5FX

Proposal: Development of the site for 87 no. residential dwellings including 40% affordable housing, associated landscaping, amenity space and car parking (outline application all matters reserved aside from access) (Updated Design and Access Statement, Arboricultural Impact Assessment and Indicative Layout Plan reducing unit numbers received)

Designation: Grade II Listed Building and Conservation Area

Comments:

Please note: My understanding is that the number of residential units has now been changed. Please make sure you only grant permission for the correct number of units. A number of other drawings of the previous scheme are also live on the website, so please make sure you do not accidentally approve the wrong documents.

I have previously advised the following for this site [new NPPF paragraphs in square brackets]:

The header shows that the historic environment considerations are the character and appearance of the conservation area and the setting of nearby listed buildings. Special regard has to be had to these matters in the determination of the application in accordance with sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

The applicant has provided a heritage statement to meet the requirements of paragraph 194 [200] of the NPPF. In line with paragraph 195 [201] I have provided further comments below.

There are three built heritage assets which have the potential to be affected by this proposal. These are:

- *Kenley Aerodrome Conservation Area*
- *The Grade II listed Former Dining Room and Institute at Former RAF Kenley (referred to as NAAFI Building henceforth)*
- *The non-designated Former Workshop Buildings*

Conservation Area

The application site forms part of RAF Kenley, described by Historic England as one of the most complete fighter airfields associated with the Battle of Britain to have survived. The site was historically common land which was later taken under the Defence of the Realm Act during the First World War. The site was used to service aircraft during the First World War, a usage which continued in the interwar period when the site was expanded. There is a 'Kenley Aerodrome Conservation Area Proposals Statement' (2006) adopted by both Croydon and Tandridge as a Supplementary Planning Document. The entire application site falls within Sub-Area 2 of the SPD.

Very little survives of the early phase of the airfield in the application site. The only identifying feature is Victor Beamish Avenue which runs northwards from Salmons Lane West and has remained

constant throughout the site's time as an airfield. Hangar buildings were built to the north of the application site during this period but have now all been demolished or destroyed. Owing to the nature of these buildings as large structures erected purely for maintaining and storing aircraft, this area is currently a large open part of the site which few features indicating its former use. The most important aspects of this area are its association and link with the airfield (including the access road around this) and the Former Workshop Building, discussed below.

As part of this initial phase, troops were stationed in single storey huts to the south of the site. During the early 1930s the Air Ministry sought to expand its RAF aerodromes across the country. Between 1932 and 1934 a major phase of development took part at RAF Kenley and it is this which most strongly contributes to the character and appearance of the conservation area today. New buildings were built in blocks to the south of the airfield including the NAAFI Building, Former Officers Mess, Former Workshop Buildings and barracks. During this time the Air Ministry consulted the Royal Fine Arts Commission and architects such as Edwin Lutyens, Reginald Blomfield and Giles Gilbert Scott had an influence on the final designs. While it is unknown who designed the landscaping of the site, it is clear that this was given detailed consideration from maps and aerial photographs shown in the statement of significance – I have included a photograph below so it is clear to what I am referring. This was very different to the plain layout of the single storey huts from the early airbase which did not have any of the paths, trees or planting which typified the 1930s redevelopment of the site. This landscaping is an important part of the conservation area's historic and architectural interest as are the communication routes throughout the site.

The area to the south was given the greatest consideration in terms of landscaping and consisted of a set of three barrack buildings which were between two or three storeys in height (it is unclear from aerial photographs). To its west the area was lined by a formal avenue of trees along Victor Beamish Avenue which were planted as part of the 1930s development. One of the barrack blocks faced directly toward Victor Beamish Road showing that views along this avenue were considered important and were designed to contribute to a sense of place on arrival. The remaining buildings were in alignment with this block with the intermediate space set out as lawns punctuated by trees and footpaths. A road ran to the north of these as a vehicular access route.

As part of this phase the NAAFI building and parade ground were constructed and were a central feature of this area. Both the building and parade ground have the same well considered landscaping with trees forming a soft boundary creating a largely self-contained site. Access between the barrack blocks and NAAFI building were via a set of paths to the east which functioned as a circulation route throughout the whole airfield. These footpaths provided access from the southern end of Victor Beamish Avenue all the way to the airfield and Officer's Mess to the north.

The area to the west of Victor Beamish Avenue was a more eclectic mix of buildings which instead had a much more formal linear appearance. The entrance to the site off Salmons Road West consisted of a pair of buildings and a gated entrance. Aerial photographs suggest these buildings were one to two storeys in height with shallow pitched roofs.

Overall, this formed a well-designed holistic scheme the open character, landscaping and layout of which gave the area a campus character for ordinary troops stationed at Kenley. As noted in the SPD, these aspects are still evident today and make a strong contribution toward the character and appearance of the Conservation Area as a well-designed scheme for a 1930s airbase. These areas must not be dismissed as being of no interest. The special historical and architectural interest of these areas as a former RAF base is particularly evident when compared to the former married quarters to the west of the site which were continually adapted, demolished and rebuilt during their time as part of airbase with very few features of note surviving in each iteration.

NAAFI Building

The NAAFI building is Grade II listed and was a purpose built canteen and entertainment complex for the ordinary military service personnel. The 'back of house' kitchen and support services were housed in the single storey sections to the north either side of a central courtyard, while the dining

halls and entertainment areas are those to the south and on the first floor. The appearance of different areas within the building indicate how they were used.

The building was constructed as part of the Air Ministry's expansion of the site between 1932-4. As noted above, the design of such buildings was influenced by the Royal Fine Arts Commission in keeping with other RAF bases around the country. For this reason, the list entry makes clear 'the careful proportions of this building reflect the impact of Air Ministry consultation with the Royal Fine Arts Commission.' The architectural and historic significance of this building includes its use as part of a Battle of Britain airfield, elevational appearance, scale, use of materials, plan form and clear separation of the different functions within the building.

The setting of the building is strongly influenced by its central position in front of the Parade Ground where its imposing appearance can be appreciated as well as its symmetry. As noted above, it was located as part of a careful and well considered landscape design which allowed troops to circulate around the site along footpaths and also along Victor Beamish Avenue.

Former Workshops

The Former Workshop Buildings to the north are an undesignated heritage asset which were used historically as a machine shop and carpenter's workshop. The building did not have the same landscaped surroundings as the former barrack blocks with the exception of a tree lined avenue to the east which formed part of the circulation routes throughout the whole airfield. Aerial photographs and maps show the building dates from the alterations to the airbase in the 1930s.

The building has limited architectural interest but is of some historic interest as evidence of the former use of RAF Kenley. It makes a positive contribution to the character and appearance of the conservation area as evidence of the use of the site and its layout. Such a contribution is limited as the building is derelict.

I am not aware that Tandridge have made any commitment toward the restoration of this building either as part of the local plan or part of the Kenley Aerodrome Conservation Area Proposals Statement, although it does say it is a priority to reconstruct the building. Since the publication of this document, the building has clearly further deteriorated.



Figure 1: 1961 Aerial photograph of RAF Kenley showing the arrangement of buildings, open spaces, trees, roads and paths.



Figure 2: 1960s Aerial photograph of RAF Kenley showing the arrangement of buildings, open spaces, trees, roads and paths.

Previous Comments

As part of my previous comments, I noted that the local plan could be withdrawn, but still gave consideration to the draft allocation for 75 houses. Throughout my comments I stressed that the number of units within the previous scheme was too high (87) and as such the character and appearance of the conservation area was suffering as a result. Key elements I raised concerns about included the open space to the south of the designation, the circulation routes throughout the entire site, overdevelopment and the alignment of the houses along Victor Beamish Avenue. The applicant has sought to respond to these elements as part of the revised scheme.

My understanding is that the local plan is in the process of being dismissed. Ultimately, this is a matter for the Planning Officer to consider in the overall determination of this application. From my point of view, I still need to assess the application in accordance with the relevant paragraphs of the NPPF and local policy. As noted last time, this includes paragraph 211 of the NPPF which makes very clear that local planning authorities should look for opportunities for new development within conservation areas to enhance or better reveal their significance. In essence, just because a site may be a conservation area, it does not mean that parts of it cannot be redeveloped in a way which better reveals its significance.

General Comments

The scheme before us has all matters reserved except the fact it is for 80 houses and the access has been provided. The applicant and I have engaged in a lot of pre-application discussion to establish the significance of the site and identify those elements which are important for preserving and enhancing its significance. I am content that the applicant has in principle responded to many of the points I have raised.

Owing to the nature of the application, the applicant will still need to submit details for the appearance, access, landscaping, layout and scale of buildings on the site. As such, I have only taken into account here those matters which specifically relate to the access of the site and the number of dwellings. I have split my comments into the northern area (the area immediately to the north of the NAAFI building), the western area (the units to the west of Victor Beamish Road) and the southern area (the units to the south of the NAAFI building).

Northern Area

Aside from the Former Workshop (discussed below) there is very little left of this part of the site and as a result there is greater potential for change, provided this change fits in with the overall landscaping of the site. Being able to understand its relationship with the airfield as well as the link with the southern and western areas are highly desirable elements. For the scheme to succeed it is vital that the northern area be understood as relating to and be accessible from the airfield itself and some of the buildings toward the north of the site should have principal elevations facing toward the airfield. These matters should be taken into account as part of the reserved matters.

The scheme will lead to the loss of the undesignated Former Workshop Building. A building recording condition to level 3 which will be needed to interpret the structure, provide drawings of its layout and elevations and photographs of the building as a whole as well as any specific features of note in line with paragraph 211 of the NPPF. In terms of the impact of its demolition, this should be considered harm to an undesignated heritage asset through its total demolition and harm to the conservation area from the loss of a building which makes a positive contribution to understanding its historic interest. It should be noted that even though the building makes a positive contribution to the conservation area, its loss should not be considered substantial harm because of its dilapidated state as I have set out above.

The heritage statement makes note of the fact the garden area to the north has the 'potential to accommodate commemorative features, artwork and /or sculpture, in response to the site's history and its contribution to World War II.' I would consider this to be a heritage benefit, but at present cannot find it on any of the drawings and am not convinced it would be enforceable should the applicant decide not to proceed with this element. I have suggested a condition below which I would encourage you to discuss with the applicant.

Western Area

The proposals for the western area of the site are well considered and have responded to concerns I raised about the alignment of buildings in this location. As can be seen in figures 1 and 2 the buildings mostly reflect the historic linear appearance of the buildings which faced directly on to Victor Beamish Avenue. I am little disappointed that two of the houses will not directly face Victor Beamish Avenue (18 and 19) but I consider this preferable to a previous scheme I saw for the site. I only wish to note here that the applicant has responded to my concerns. I will have to consider the design of these buildings as part of the reserved matters stage.

Southern Area

Historically, this was an open landscaped area with accommodation in three barrack blocks. As a result, the well landscaped space around these had an open communal use for troops to make use of while resting with footpaths connecting all of the area with the airfield to the north. The aerial photographs also show that one of the barrack blocks faced directly on to Victor Beamish Avenue to create a sense of place. Any building on Victor Beamish Avenue should have its principal elevation facing the highway owing to its status as a gateway for the wider airfield. There should also be good connectivity throughout the area with the rest of the airbase.

Since the previous scheme this element of the proposal has improved significantly. Key changes include the removal of units to provide more open space, better connectivity through the site and the re-orientation of units 3-10 so they face directly onto Victor Beamish Avenue. I am pleased to say that this has responded to the points I raised in my initial consultation response. I consider that the proposed residential units and improved interconnectivity of the site has the potential to enhance the conservation area, subject to reserved matters.

Overall Balance and Reserved Matters

As outlined above, there will be harm from the scheme from the loss of the Former Workshop Buildings. While the rest of the site will quite significantly change from its current character and appearance, I am not of the opinion that this will necessarily equate to harm. This is because only

elements of the character and appearance of the site reveal its historic or architectural interest. Ultimately, the applicant has given careful thought and consideration to those elements highlighted as being significant.

On balance, I consider that the arrangement of the buildings along Victor Beamish Avenue and the improved connectivity throughout the site will be an improvement. There will also be a benefit from the proposed new sculpture to the north of the site. Subject to the reserved matters being acceptable, I consider the scheme to result in an overall benefit to the conservation area.

The following will need careful consideration at the reserved matters stage:

- I am keen to see careful thought and attention given to the materiality of the paths around the conservation area. These are a vital element of the character of the area showing it as being one former airbase. I would not object to the central avenue being block paving should you feel it needs to be differentiated from the rest of the site.
- The driveway for Plot 13 may prove a little tricky in terms of the footpath going past the building. I am quite keen not to see a boundary fence put up all the way along the path. You may prefer to change the access to run between Plot 12 and 14 if it proves an issue.
- As stated previously, I have no issues with Plots 3-10 being 3 storey as per the original barrack buildings if it improves the viability of the site.
- I would like to see details of the proposed gates to the courtyard parking for plots 53-80. I would anticipate these being not overly decorative.
- The connectivity between the north of the site and the airfield is key to enhance the conservation area as a whole. I would encourage you to give this thought in terms of landscaping.
- Conversely, I would quite like to see spaces 67-73 hidden behind a low lying hedge, if possible, when viewed from the airfield.
- You may wish to raise the proposed sculpture with the Kenley Revival project. Some interpretation here would be welcome as well.
- Exposed brick and slate are particularly welcome as materials for this site as a whole. A further condition may be applied asking for samples should it not be clear what is being proposed.
- Should casement windows be proposed, these should have even sightlines. I would prefer top hung sash units to be avoided.
- I would support a sign at the entrance to the site welcoming people to the former airbase, although I am not sure how achievable this would be in reality.

Conditions

At present, quite significant elements of the proposal are reserved so there are only limited conditions which should be applied. I have spoken to the applicant about these before and would suggest:

1. Prior to the commencement of the works, a scheme for the recording of existing architectural and historic features affected by the works shall be submitted to and approved in writing by the Local Planning Authority. This shall include a record of the Former Workshop Building to level 3 of *Understanding Historic Buildings* and a photographic record of the entire site. The scheme shall thereafter be implemented as approved.

Reason: The Local Planning Authority is satisfied that it is fundamental to the development permitted to address this issue before development commences and that without this safeguard planning permission should not be granted, and to record the architectural and historic fabric of the building in accordance with the advice of paragraph 211 of the National Planning Policy Framework.

2. Prior to the commencement of works, details of the commemorative feature, artwork and /or sculpture; a timescale for their implementation; and their proposed locations shall be submitted

and approved in writing Local Planning Authority. The scheme shall thereafter be implemented as approved.

Reason: To ensure that the development hereby permitted is not occupied until the specified operations have been completed in the interests of the amenities of the area.

I have assessed this application in line with paragraphs 201 and 205 of the NPPF. Subject to the reserved matters, I am of the opinion that the scheme overall will result in a benefit to the conservation area owing to the proposed commemorative feature, reinstatement of paths, better connectivity with the airfield and the arrangement of buildings along Victor Beamish Avenue. Such a benefit is modest and this will need to be taken into account with regard to other matters raised by consultees.

Signed: Christopher Reynolds, Historic Buildings Officer
File Ref: 32/10/655

Date: 14/02/2024

APPENDIX 7 – ORIGINAL SPORT ENGLAND CONSULTATION RESPONSE

Tandridge District Council

FAO: Sean Scott

By email only

25th September 2023

**Town & Country Planning (Development Management Procedure) (England)
Order 2015**

Application Reference: 2023/878

Site: KENLEY AERODROME, VICTOR BEAMISH AVENUE, CATERHAM, CR3 5FX

Proposal: Development of the site for 87no. residential dwellings including 40% affordable housing, associated landscaping, amenity space and car parking (outline application all matters reserved aside from access) (This is a major planning application and a Departure from the Development Plan. The site is located within the Kenley Aerodrome Conservation Area, it affects the setting of Listed Buildings, and affects the Setting of Scheduled Monuments)

Sport England Reference: PA/23/SE/TN/65609

Thank you for consulting Sport England on the above application.

Sport England – statutory consultee role and policy

We understand that you have consulted us as a statutory consultee in line with the above Order. Therefore, we have considered the application in light of the National Planning Policy Framework (NPPF), in particular paragraph 99, and Sport England's Playing Fields Policy, which is presented within our 'Playing Fields Policy and Guidance Document': www.sportengland.org/playingfieldspolicy

Sport England's policy is to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of:

- all or any part of a playing field, or
- land which has been used as a playing field land remains undeveloped, or
- land allocated for use as a playing field

unless, in the judgement of Sport England the development as a whole meets with one or more of five specific exceptions. The exceptions are provided in the Annex to this response.

The proposal and impact on playing field

The proposal will result in the loss of the existing playing field at the site. Sport England notes that the playing field has been marked out and used for football

and rounders. The pitch does not conform to FA recommended size guidelines and measures 66m x 41m. Given the constraints of the playing field site, Sport England considers that only a 7 x 7 FA recommended sized pitch can be accommodated (61m x 43m inc 3m run/off) in this area.

Sport England notes that there is no proposal to replace the playing field.

We have consulted the Football Foundation/FA on the application and we have received the following comments. The FF comments that the Playing Pitch Strategy (PPS) for Tandridge from 2018 states that based on demand at the time, there was relatively minimal capacity existing on youth and mini pitches. However, with the increased participation numbers in the last couple of years within the area is likely to have had an impact on the demand and capacity of the pitches. The PPS is now considered out of date. Therefore, with no update PPS there is no current evidence for the loss of grass pitches. The plans show the loss of a grass pitch therefore we would expect mitigation for this via replacement of the grass pitch provision to equal or better scale and quality, or contribution into alternative appropriate facilities to mitigate the loss (i.e. 3G pitch provision) within the area.

Assessment against Sport England's Playing Fields Policy and NPPF

The application will result in the loss of the playing field/pitch at the site without any proposed replacement provision. There is no evidence which justifies the loss of the playing field as surplus to requirements.

Sport England considers that the District Council's Draft Local Plan policy TLP39 is relevant to the application and supports Sport England's position.

"TLP39: Providing Playing Pitches and Built Leisure Facilities

Existing Facilities

All existing playing pitches including those on the Policies Map, and built leisure facilities as depicted on the Policies Maps, will be protected for their current use unless they are appropriately replaced in a suitable location, or where demonstrated they are surplus to requirement. All applications for development must be in accordance with the Council's most up-to-date Playing Pitch Strategy."

As indicated by the Football Foundation, the PPS is now 5 years old and is at the end of its life in terms representing a robust and up to date assessment of need.

Sport England's position

Given the above considerations, Sport England raises a **statutory objection** to the application because it is not considered to accord with any of the exceptions to

Annex

The Five Exceptions to Sport England's Playing Fields Policy

Exception 1

A robust and up-to-date assessment has demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the catchment, which will remain the case should the development be permitted, and the site has no special significance to the interests of sport.

Exception 2

The proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.

Exception 3

The proposed development affects only land incapable of forming part of a playing pitch and does not:

- reduce the size of any playing pitch;
 - result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);
 - reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality;
 - result in the loss of other sporting provision or ancillary facilities on the site;
- or
- prejudice the use of any remaining areas of playing field on the site.

Exception 4

The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:

- of equivalent or better quality, and
- of equivalent or greater quantity, and
- in a suitable location, and
- subject to equivalent or better accessibility and management arrangements.

Exception 5

The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.

The full 'Playing Fields Policy and Guidance Document' is available to view at:
www.sportengland.org/playingfieldspolicy

our Playing Fields Policy; paragraph 99 of the NPPF; or Tandridge District's Draft Local Plan policy TLP39.

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agendas, report(s) and committee date(s).

If you would like any further information or advice, please the undersigned.

Yours sincerely,

Owen Neal (MRTPI)
Planning Manager

E: owen.neal@sportengland.org
T: 07788396293

APPENDIX 8 – DECISION NOTICE

TANDRIDGE DISTRICT COUNCIL

Town & Country Planning Act 1990

Nadia Shojaie
Daniel Watney LLP
165 Fleet Street
London
EC4A 2DW

TANDRIDGE DISTRICT COUNCIL as Local Planning Authority under the provisions of Part III of the Town and Country Planning Act 1990 hereby REFUSES planning permission for: -

Development of the site for 80no. residential dwellings including 40% affordable housing, associated landscaping, amenity space and car parking (outline application all matters reserved aside from access)

At

Kenley Aerodrome, Victor Beamish Avenue, Caterham, Surrey, CR3 5FX

in accordance with the application registered by the Council on the 20th July 2023 for the following reasons: -

1. The proposal would result in the loss of a playing field, which would not be replaced as part of the proposal and would therefore conflict with Policy CSP13 of the Tandridge District Core Strategy 2008, Policy DP 18 of the Tandridge Local Plan - Part 2: Detailed Policies 2014, Sport England's Playing Fields Policy and Guidance Document and with Paragraph 103 of the National Planning Policy Framework (December 2023).
2. The proposed development is considered to be inappropriate development in the Green Belt, given that it would fail to comply with any of the defined exceptions at paragraphs 154 and 155 of the National Planning Policy Framework (December 2023). The cumulative benefits of the scheme which have been presented as Very Special Circumstances (VSCs) are insufficient to outweigh the substantial harm to the Green Belt, by virtue of inappropriateness and due to the harm to openness that would arise, in addition to the significant harm to the character and appearance of the site, area and landscape. Accordingly, the proposed development is considered to be contrary to Policies DP10 and DP13 of the Tandridge Local Plan 2014 Part 2: Detailed Policies and the NPPF (December 2023).
3. The site is located in an unsustainable location in transport terms, where the only realistic means of transport would be the private car, due to the distance to local amenities, the lack of suitable pedestrian and cycle connections to those amenities, and the limited availability of accessible public transport services. This is contrary to the aims of the NPPF (December 2023), the Surrey Local Transport Plan 4 (2022) Policy CSP1 Tandridge District Core Strategy (2008), and Policy DP1 of the Tandridge Local Plan 2014 Part 2: Detailed Policies.

4. The proposals would result in an unacceptable impact to highway capacity, in particular at the roundabout junction of Salmons Lane West, Buxton Lane and Ninehams Road, contrary the aims of the NPPF (December 2023) , the Surrey Local Transport Plan 4 (2022) the Tandridge Core Strategy 2008 and Policy DP5 of the Tandridge Local Plan - Part 2: Detailed Policies 2014.
5. The proposed development would result in the felling of a significant number of protected trees subject to Tree Preservation Order protection or protected due to their location within the Kenley Aerodrome Conservation Area. The indicative layout details provided would not allow for the retention of existing trees that are important by virtue of their significance within the local landscape and would not appear to allow sufficient space for appropriate replacement planting and as such the proposal would conflict with the requirements of Policy CSP 21 of the Tandridge District Core Strategy 2008, Policy DP7 of the Tandridge Local Plan - Part 2: Detailed Policies 2014 and paragraph 180 of the National Planning Policy Framework (December 2023).
6. Insufficient information has been provided to allow a full assessment of the potential harm of the proposed development on designated and non-designated heritage assets, including the Kenley Aerodrome Conservation Area within which the application site is located and the Grade II listed former Dining Room and Institute building which the application site surrounds. Proposed 'mitigation' measures have not been detailed and it has not been demonstrated that the public benefits of the proposal would significantly outweigh the less than substantial harm that would result to the character and appearance of the conservation area, the impact on the character and setting of the listed building and through the loss of the non-designated former workshop buildings as a result of the development. As such, the proposal would conflict with Policy DP20 of the Tandridge Local Plan - Part 2: Detailed Policies 2014 and paragraphs 205, 206, 208 and 209 of the National Planning Policy Framework (December 2023).
7. Insufficient information has been provided to demonstrate that the proposed development would conserve and enhance the natural environment and deliver an appropriate level of biodiversity net gain. As a result, the proposal would conflict with the requirements of Policy CSP17 of the Tandridge District Core Strategy 2008, Policy DP19 of the Tandridge Local Plan - Part 2: Detailed Policies 2014 and the National Planning Policy Framework (December 2023).

Informatives:

1. The development has been assessed against Tandridge District Core Strategy 2008 Policies CSP1, CSP2, CSP3, CSP4, CSP7, CSP12, CSP13, CSP14, CSP15, CSP17, CSP18, CSP19 and CSP21, Tandridge Local Plan: Part 2 – Detailed Policies 2014 – Policies DP1, DP5, DP7, DP10, DP13, DP18, DP19, DP20, DP21 and DP22, Caterham, Chaldon and Whyteleafe Neighbourhood Plan 2021 Policies CCW4, CCW5, CCW6 and CCW10 and material considerations.
2. The Local Planning Authority has acted in a positive and creative way in determining this application, as required by the NPPF (December 2023), and has assessed the proposal against all material considerations including the presumption in favour of sustainable development and that which improves the economic, social and environmental conditions of the area, planning policies and guidance and representations received.
3. This decision relates to drawings and documents numbered 21125/C04B, C05, C06A, C07A, C08A, C09A, C10A, C100, C104C, P101, P110, 21174-3, 21174-4, 2193-00-GF-DR-L-00100 and 00101.

Dated: 13 May 2024

Femi Nwanze
for Helen Murch
Chief Planning Officer

NB: *Please also see attached notes*

APPENDIX 9 – OFFICERS REPORT

Application: 2023/878

Location: Kenley Aerodrome, Victor Beamish Avenue, Caterham, Surrey, CR3 5FX

Proposal: Development of the site for 80no. residential dwellings including 40% affordable housing, associated landscaping, amenity space and car parking (Outline application all matters reserved aside from access)

Ward: Portley

Constraints – Article 4 (ENF/2007/29). Adjacent to Ancient Woodland (500 metres), Biggin Hill Safeguarding, Kenley Aerodrome Conservation Area, Gas Pipeline within 175m, Green Belt, Kenley Safeguarding, Listed Building – Former Dining Room and Institute at Former RAF Kenley – Grade II, C and D Class Roads, Risk of 1 in 100- and 1000-year Surface Water Flooding, Source Protection Zones 2 and 3, Tree Preservation Orders.

Decision Level: Chief Planning Officer - Delegated

RECOMMENDATION: Refuse

1.0 Summary

- 1.1 Planning permission is sought for a development comprising of 80 dwellinghouses, including 40% affordable housing, with associated landscaping, amenity space and car parking. The application has been submitted in Outline with all matters reserved aside from access.
- 1.2 As set out below, the proposal represents inappropriate development in the Green Belt, would cause harm to openness and conflict with the purposes of the Green Belt. Substantial weight is required to be afforded to each of these elements of harm. Harm would also be caused to designated heritage assets, including the Kenley Aerodrome Conservation Area, within which the site is located, the Grade II listed Former Institute and Dining Hall building which the application site surrounds, and in terms of the development's impact on the character, appearance and setting of those assets as a result of the significant tree and woodland removal proposed. The proposal also raises concerns on sustainability grounds, given its reliance on private car users to access services and on highway capacity grounds. Insufficient information has also been provided to allow the full ecological and biodiversity impact of the development proposal to be assessed. Lastly, the proposal would also result in the loss of a playing field which would not be replaced as part of the development proposal.
- 1.3 However, the identified harm has to be balanced against the benefits of the proposed scheme which would include the provision of 80 dwellings, 40% (32 units) of which would be affordable, the development achieving high renewable energy and efficiency performance and the provision of a large area of publicly accessible open space. However, as specified by NPPF paragraph 11d(ii), the tilted balance does not apply to this application because the adverse impacts significantly and demonstrably outweigh the benefits. As identified in the report, the development is considered to result in inappropriate development in the Green Belt where the very special circumstances (VSC) put forward to be considered do not demonstrably outweigh the benefits.
- 1.4 Overall, it is not considered that such matters constitute the Very Special Circumstances that would have to exist to enable the development to be found acceptable in Green Belt terms. On balance, it is therefore considered that the benefits of the scheme do not outweigh the harms that would be caused should planning permission be granted. Therefore, it is recommended that planning permission be refused.

2.0 Site Description

- 2.1 The site is located on the edge of Kenley Aerodrome and within the Kenley Aerodrome Conservation Area close to the border with the London Borough of Croydon. The site forms part of a wider area that was once a Battle of Britain airfield and comprises the land surrounding the Grade II listed former NAAFI building. To the west, on the other side of the access road (Victor Beamish Avenue), is a flat open area with a number of semi-mature trees. The northern part of the site includes redundant workshops, that are not listed, an area of hardstanding and there are some deposits of building materials. To the south of the former NAAFI building, which is now in use as a school, is a playing field.
- 2.2 The entirety of the site is located within the Metropolitan Green Belt. The site was previously considered as a potential allocation (HSG06) in 'Our Local Plan 2033'. This plan has been recommended for withdrawal (subject to ratification at Full Council) as the Inspectors' final recommendation was that the submitted plan should not be adopted due to soundness issues. It should be noted, however, that the Examination Inspector raised concerns in relation to this site. This matter is discussed in greater detail in the following sections.
- 2.3 The site forms the setting of the Grade II listed NAAFI building now in use by One School Global. Within the curtilage of the former NAAFI building is the parade ground which is used as a playground by the school. To the east of the principal school building are four portacabins which are used as teaching facilities. The site however excludes the former NAAFI building itself, which is used by One School Global, an independent day school.

3.0 Relevant Planning History

- 3.1 2015/244 - Change of use of the former NAAFI building to be used as an independent secondary school. Formation of roof over voids and internal alterations (LBC) – Granted 06.05.2015
- 3.2 2015/179 - Change of use of former NAAFI building to secondary school (Class D1). Formation of roofs to voids within existing building to centre and north of building. Formation of new access drive and parking – Approved 06.05.2015
- 3.3 2012/49 - Demolition of part of building. erection of extension and conversion of former workshop building at Kenley Aerodrome for use as a new independent secondary school. formation of parking and hardsurfacing – Withdrawn 02.07.2012
- 3.4 2009/1296 - Change of use to provide day school, incorporating use of parade ground as play area and upgrading of field to use as playing field - application to extend time limit for implementation of permission 2004/903 – Approved 09.12.2009
- 3.5 2004/1665 - Internal & external alterations (LBC) – Granted 19.10.2004
- 3.6 2004/903 - Change of use to provide day school, incorporating use of parade ground as play area and upgrading of field to use as playing field – Approved 03.06.2004
- 3.7 2003/474 - Improvements to existing site access road and junction, to adoptable standard. conversion of former workshop building (incorporating infilling of courtyard) to place of worship (class D1) with associated parking & landscaping – Approved 20.05.2003

- 3.8 2001/321 - Conversion of former NAAFI to create B1 accommodation with associated parking and landscaping (LBC) – Withdrawn 02.07.2002
- 3.9 2001/320 - Conversion of existing store buildings and former sergeants' mess and NAAFI to provide B1 accommodation with associated parking and landscaping – Withdrawn 02.07.2002
- 3.10 1999/280 - Redevelopment of site to provide 41 x 3 bed, 36 x 4 bed and 8 x 5 bed houses; 9 x 2 bed, 18 x 3 bed, 2 x 4 bed and 1 x 5 bed affordable houses and 6 x 1 bed affordable flats (total 121 dwellings) associated garaging/ parking, twin access from Buxton Lane/Hayes Lane, open space, play area and pedestrian and maintenance vehicle access to Kenley Common – Refused by the Secretary of State 29.11.2000. *(This application relates to the site abutting the northwest corner of the application site around Collard Close).*

4.0 Proposal

- 4.1 The application initially sought Outline planning permission for the development of the site for 87no. residential dwellings including 40% affordable housing, associated landscaping, amenity space and car parking (All matters reserved aside from access). The proposal has subsequently been amended to reduce the number of dwellings proposed to 80 units.
- 4.2 The 80 dwellings would now comprise of 32 affordable housing units and 48 market dwellings and would range from 2-bedroom starter units to 5-bedroom dwellings. The proposal would provide a residential density of 18.1 dwellings per hectare on this 4.4-hectare site.
- 4.3 In terms of storey heights the dwellings would range from 2 to 3 storeys with the majority of dwellings being of a two-storey design. There would also be some single storey garages provided.

Access and Highway Arrangements

- 4.4 Access will be achieved via Victor Beamish Avenue, which is accessed from Salmons Lane West. Victor Beamish Avenue also provides access to One School Global, Kenley as well as access to a gliding club and an RAF gliding facility located on the airfield. Pedestrian access would also be provided via footpaths to the north of the site.
- 4.5 The road is provided with a lit footway along the western edge of the carriage way. Victor Beamish Avenue forms a junction with Salmons Lane West to the south, to the west of the junction Salmons Lane West is a two-way road, operating a 30mph speed limit, to the east of the junction Salmons Lane West splits into two roads, Salmons Lane West and Salmons Lane. Salmons Lane West enables only westbound movements from Whyteleafe Road, while Salmons Lane enables only north-eastbound movement towards Whyteleafe Hill.
- 4.6 To the west, Salmons Lane West forms a roundabout junction with Buxton Lane and Ninehams Road. Buxton Lane enables access south towards Caterham-on-the-Hill town centre. To the east both Salmons Lane West and Salmons Lane form Junctions with Whyteleafe Hill/ Whyteleafe Road, which provides access south towards Caterham-on-the-Hill town centre and north towards Whyteleafe.

- 4.7 Victor Beamish Avenue will enable access to the proposed northern section of the site, with further cul-de-sacs towards the southern section of the site. There will also be a limited number of properties with direct access onto Victor Beamish Avenue.
- 4.8 Pedestrian access will also be achieved via Victor Beamish Avenue. The existing footway along the western side of the road will be retained, with sections of footway being provided on the western edge of the carriageway where it serves access to properties. Informal pedestrian crossing points, provided with tactile paving will be provided to enable pedestrians to cross between the footways.
- 4.9 Two pedestrian accesses into the site will be constructed from the north, enabling pedestrian and cycle access to the outskirts of Kenley Aerodrome. These accesses will be located where historic accesses to the site are located.

5.0 Statutory and Non-Statutory Consultations

- 5.1 NATS Safeguarding – No safeguarding objection to the proposal.
- 5.2 Surrey Hills AONB Planning Adviser – Consider that the site is sufficiently far from the existing Surrey Hills AONB or Natural England’s proposed AONB candidate areas, and with intervening development, for the proposed development not to spoil their setting.
- 5.3 Surrey Police - In relation to plots 37-41, which has a rear courtyard, rear courtyards are to be discouraged for the following reasons, they introduce access to the vulnerable rear elevations of dwellings where the majority of burglary is perpetrated. Ungated courtyards provide areas of concealment which can encourage anti-social behaviour. If unlit, can increase the fear of crime, I have not seen the lighting proposal for this development but strongly recommend all street lighting for adopted highways and footpaths, private estate roads, unadopted roads and car parks must comply with BS 5489-1:2020:

If there is a statutory provision that conflicts with the lighting requirement, then requirement should be discussed with the local authority lighting designer and self.

The parking provisions further into the development, plots 51-54, plots 55-59 also have rear communal parking. Again, this can introduce vulnerabilities to the rear of these dwellings. There is also limited natural surveillance for parking provision for plots 77-78. Parking bays should ideally benefit from “good” natural surveillance.

I would also welcome engagement with the developer regarding rear boundary provisions for certain proposed dwellings due to their orientation.

- 5.4 Surrey Fire & Rescue Service - Whilst we acknowledge the implications that such a development could have on our resources, we do not generally exercise our right to comment at this stage. Formal consultation will be undertaken through the Approved Building Inspector or Building Control Authority should the application be successful.

Further comments - The above application (including any schedule) has been examined by a Fire Safety Inspecting Officer and there is insufficient detail provided to assess whether it will meet with the access requirements of Approved Document B Section B5 of the Building Regulations when the initial notice is submitted.

- 5.5 Surrey County Council – Archaeology – The Assessment indicates that archaeological remains of National Significance worthy of preservation *in situ* are unlikely to be

present. As such, I consider it reasonable and proportionate to secure the archaeological evaluation, any subsequent archaeological mitigation measures and the provision of an information board by attaching conditions to any permission that may be granted:

- 5.6 London Gatwick – The proposed development has been examined from an aerodrome safeguarding perspective and it does not conflict with safeguarding criteria. We therefore have no objection to this proposal.
- 5.7 Surrey County Council – Historic Buildings Officer – There will be harm from the scheme from the loss of the Former Workshop Buildings. While the rest of the site will quite significantly change from its current character and appearance, I am not of the opinion that this will necessarily equate to harm. This is because only elements of the character and appearance of the site reveal its historic or architectural interest. Ultimately, the applicant has given careful thought and consideration to those elements highlighted as being significant.

On balance, I consider that the arrangement of the buildings along Victor Beamish Avenue and the improved connectivity throughout the site will be an improvement. There will also be a benefit from the proposed new sculpture to the north of the site. Subject to the reserved matters being acceptable, I consider the scheme to result in an overall benefit to the conservation area.

Subject to the reserved matters, I am of the opinion that the scheme overall will result in a benefit to the conservation area owing to the proposed commemorative feature, reinstatement of paths, better connectivity with the airfield and the arrangement of buildings along Victor Beamish Avenue. Such a benefit is modest, and this will need to be taken into account with regard to other matters raised by consultees.

- 5.8 Surrey County Council – Early Years Commissioning - Based on a sufficiency overview, and anecdotal evidence from providers in the area, it should be possible for the additional place requirement generated by this development to be absorbed by current providers.

However, it should be noted that the development is on the Surrey border and therefore sufficiency assessments for the neighbouring Local Authority should also be considered. In addition, the eligibility for funded entitlements for working parents, will be extended from April 2024, further in September 2024 and again in September 2025. Demand may be significantly impacted by the expansion of eligibility but the extent of this is unknown at this stage.

- 5.9 Environment Agency – No objection, subject to conditions.
- 5,10 Lead Local Flood Authority – No objection, subject to conditions.
- 5.11 Contaminated Land Officer – TDC – No objection on contaminated land grounds, subject to conditions. Also highlights the risk of Unexploded Ordnance (UXO) at the site and considers that whilst this is primarily a matter for the main contractors CDM team, a suitable framework for assessment of UXO can reasonably be secured through the planning process and to that end have included mention of UXO assessment specifically in the contaminated land condition.
- 5.12 National Highways - No objection. Given the distance from our network, we are satisfied that the development will not materially affect the safety, reliability and/or

operation of the strategic road network (the tests set out in DfT Circular 01/2022, and MHCLG NPPF 2023 paragraphs 110-113) in this location and its vicinity.

- 5.13 Environmental Health – TDC - Note that the applicant is going to use air source heat pumps (ASHP's) for heating the properties. These can be noisy and affect the residential amenity of neighbours.

Therefore, if planning permission is granted, they would suggest that a condition is added stating that noise from the use of ASHP's shall conform to the advice given in the Institute of Acoustics and Chartered Institute of Environmental Health Professional Guidance Note on Heat Pumps, which recommends a maximum sound rating level of <35 dB at any noise sensitive neighbouring premises.

- 5.14 Natural England – No objection. Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites.

- 5.15 Caterham on the Hill Parish Council – Object. The Parish Council does not view the approval of outline planning as a legitimate procedural step, unless it remains within the parameters stated, and members were taken aback by the decision regarding 5 Queens Park Road.

The overall suitability for development has not been established. This is a highly complex site, and several material issues must be considered first:

The site was originally proposed for removal from the Green Belt in the draft Tandridge Local Plan, since judged unsound by the Inspector. It therefore remains designated Green Belt land and residential development is by definition harmful unless very special overriding circumstances can be demonstrated. If not, development remains in principle inappropriate.

The site forms a principal part of one of the best-preserved Battle of Britain airfields nationally. The airfield contains listed buildings and Scheduled Ancient Monuments and is a Conservation Area, responsibility for which is shared with LB Croydon. The Inspector regarded the information submitted by Tandridge for the heritage implications of development as inadequate and needing further analytical work.

Both the South London Downs National Nature Reserve and a candidate area for extending the Surrey Hills AONB are now adjacent to the site (but were not when this site was being evaluated in the draft Local Plan). Visual openness is a defining characteristic of both these designations, as it is for the Green Belt and the Conservation Area (including views to and from the airfield). The setting of the nationally important heritage assets is also defined as the visual envelope within which their historic significance may be understood and appreciated by the public. How would that be affected by a surrounding residential development?

The site cannot be considered in isolation. There are potential cumulative environmental effects in respect of the adjoining permitted residential development around the listed Officers Mess. This includes a block of flats overlooking the historic airfield. The risk is that the airfield ends up ringed with over-dense development on the Tandridge side, to the detriment of those authorities responsible for the remainder. They include LB Croydon, City of London, Historic England and Natural England. So far TDC has approached development in an entirely piecemeal way, with no evidence of strategic thinking over the future of the airfield. Where for example is a Tandridge

Planning Brief (agreed with local stakeholders) setting out the design parameters any scheme must address?

All these considerations affect the first principle of whether further residential development is appropriate here. They are thus ideally suited to an Outline application, so that the developer need not commit to the cost of a fully supported application before the basic principle has been tested. The government Planning Portal makes clear that Outline applications are to be used to gain an understanding as to whether the nature of a development is acceptable. Accordingly, an Outline application need only be supported in the first instance by a location and site plan. If the general principle is acceptable (with regard to broader issues such as those set out above) then the detailed design comes later as reserved matters. The Parish Council objects strongly to the application as it is currently presented, on the grounds that the Planning Authority has acted improperly to an extent that invalidates it.

Subsequent comments received as follows: A Member of the Chartered Institute for Archaeologists has reviewed the recently submitted Archaeology Desk-based Assessment on our behalf. The Parish Council comments as follows:

The character of Caterham has been shaped by our role as a garrison and military town for the army and air force from the 19th century. It includes an important role in the history of military aviation. RAF Kenley is a key part of public appreciation of that heritage. Collectively the Conservation Area with its listed buildings, Scheduled Ancient Monuments and many undesignated military assets is of national significance. It is one of the best surviving historic airfields nationally, was operational during both World Wars and played a pivotal role in the Battle of Britain.

The Parish Council seeks to ensure that our cultural heritage is recognised, conserved and enhanced within the development process. There is clear evidence from maps and aerial photographs that a range of undesignated 20th century military assets are likely to be survive within the site, above and below ground. They may include boundary markers, air raid shelters and disused workshops. A possible fighter aircraft crash site has also been identified. Collectively, these undesignated assets contribute to the overall national significance of the airfield.

Therefore, we do not understand the report conclusion that the archaeological potential of the site is negligible. It appears to be based on a view that 20th century military remains, rather than being significant archaeologically are modern obstructions that have probably truncated anything earlier in date. Instead, the Parish Council regards them as a principal research objective.

The process for identifying, ranking and mitigating any potential archaeological impact of development is well established. It is set out in the standards and guidance of the Chartered Institute for Archaeologists. The Parish Council is recommending an archaeological field evaluation that should include walkover and geophysical survey to inform selective trial trenches (if required). Given that the applicant is a school, there may be an opportunity for an element of community archaeology. It has previously been organised via the Inspector of Ancient Monuments at Historic England under the Lottery funded Kenley Revival Project. This aims to preserve and protect the most intact fighter airfield of WW2.

We draw the District Council's attention to our previous comments about the need for a joined-up strategic approach to conserving and enhancing the Conservation Area, rather than piecemeal fragmented planning applications. This is a case in point. The history and archaeology of this site and the adjoining Officers Mess development are

a single contiguous whole. A Written Scheme of Investigation for an archaeological field evaluation has already been submitted for the latter (application 2015/1746/Cond1). The District Council should consult the SCC archaeological planning advisory service for guidance.

Our comments concerning archaeology are without prejudice to the Parish Council's previous statutory submission. We do not believe that the principle of development has been established. Under an Outline application for access only, matters of technical detail such as this report are premature. The Parish Council seeks in particular to understand what the Very Special Circumstances justifying an otherwise inappropriate development in the Green Belt are. That includes the effect on the openness of the Green Belt (NPPF 2023 paras 148 and 149). We would welcome a dialogue with the applicant and draw the District Council's attention to para 132 of NPPF 2023 in that regard.

- 5.16 Defence Infrastructure Organisation – The MoD does not object to the principle of the development of the site subject to appropriate conditions.
- 5.17 Surrey County Council – Highways – Recommend refusal on the grounds that the development is unsustainable in transport terms and due to its impact on the performance of the public highway.
- 5.18 Whyteleafe Village Council – Object on the following grounds:
- It is envisaged that the foul water drainage will be joined to the existing sewer running through Whyteleafe Hill (Whyteleafe). Councillors would wish to be satisfied that this sewer has adequate capacity to deal with so many additional properties. There appears to be no such assurance in the application, and we note the objection raised by the Environment Agency.
 - The Caterham Flood Action Group has submitted commentary relating to the impact of rainwater on the site. This could have a critical impact on Whyteleafe in terms of where all this water will be directed. Where will the water drain? As a neighbouring Parish, we would not want water directed onto Whyteleafe Hill where the highways drains are already at full capacity and regularly blocked with leaf litter and other debris. These gullies and drains regularly overflow following heavy rainfall and can even surcharge lifting drain covers on occasion. It is important to avoid any exacerbation of this unacceptable situation.
 - In terms of surface water management, the Council would wish to be satisfied that there is adequate provision of surface water catchment within the site and that water is retained and any drainage into the surrounding ground is delayed for as long as possible in order to reduce adding to groundwater levels in the valley below. This is because parts of the settlement in Whyteleafe have a history of groundwater flooding during wetter winters.
 - The local roads are already busy and 87 new houses will generate a lot of additional traffic and parking. Combine this with deliveries and other vehicle traffic and there could be great pressure added to the road infrastructure impacting the amenity of local residents. Councillors also note the reservations raised by Surrey County Council Highways.
 - The construction phase would produce a lot of lorry traffic and we would wish to see further explanation of how this traffic will be managed particularly at peak periods when roads become very busy due to the close proximity of local schools. There is a primary and secondary school and the use of local roads

by construction vehicles should be avoided during school drop-off and pick-up times.

5.19 Sport England – Raises a statutory objection to the application because it is not considered to accord with any exceptions to Sport England’s Playing Fields Policy.

5.20 Thames Water – No objection.

5.21 Historic England – Do not wish to offer any comments.

5.22 Surrey Wildlife Trust –

Planning Stage	Recommendation
Prior to determination	Clarification regarding the suitability of trees to be removed to support roosting bats; and further survey if required; Hazel dormouse presence/likely absence surveys; Clarification of extent of reptile presence/likely absence surveys; Clarification of classification of grassland habitats; Assessment of impacts on the nearby statutory and non-statutory sites; Detailed assessment of on-site woodland; Biodiversity net gain assessment
Prior to commencement	Badger survey; Sensitive Lighting Management Plan; Invasive Species Management Plan; Landscape and Ecological Management Plan (LEMP); Construction Environmental Management Plan (CEMP)
Prior to occupation	N/A
General Recommendations	Precautions should be taken during construction to ensure no harm to terrestrial mammals; Demolition, vegetation, and site clearance should take place outside the breeding bird season or following nesting birds checks; Suggested biodiversity enhancements should be included in the final design

5.23 London Borough of Croydon – No objection.

Public Consultation.

5.24 The application has been advertised by way of site notices, a newspaper notice and letters being sent to nearby residents.

5.25 42 representations have been received, including one of support. The objections received raise concerns on the following grounds:

- Harmful impact on highway safety.
- Speeding traffic is already experienced and would exacerbate the risks. Traffic calming measures should be provided.
- The poor condition of the roads within the locality would be worsened.

- Increased pollution has been suggested generally. Pollution from traffic has been mentioned specifically.
- Loss of trees at the site would remove mitigation of air pollution.
- Would cause increased pressure on services which has inadequate school places, doctor services and dentist facilities.
- Light pollution.
- Development in the Green Belt with the Very Special Circumstances requirement not being met.
- Other previously developed land should be used rather than this site.
- Proposal would represent overdevelopment of the site.
- The site is a memorial ground and shouldn't be developed on.
- Development would be out of keeping with surrounding development.
- Loss of green space would be detrimental to the character of the area.
- Traffic generation would increase congestion.
- Adverse impact on ecology, the character and setting of the listed building and on the conservation area.
- Adverse visual impact.
- Surface water runoff issues have not been adequately addressed.
- Location is unsustainable in accessibility terms with residents having to rely on private cars to access services due to poor public transport links and the topography of the area.
- Flooding issues and lack of sewer capacity.

The letter of support indicates that they consider there is a need for additional housing in the area.

- 5.26 The representations received were predominantly from local residents but also included comments from RAF Kenley, Caterham Flooding Action Group and Chris Philp MP.

6.0 National Planning Policies and Guidance

- 6.1 The National Planning Policy Framework (NPPF) (December 2023).
Planning Practice Guidance (PPG)
National Design Guide.

Development Plan and Other Guidance

- 6.2 The Tandridge Development Plan is formed of Tandridge District Core Strategy 2008, Tandridge Local Plan Part 2: Detailed Policies 2014-2029, Caterham, Chaldon & Whyteleafe Neighbourhood Plan 2021, Limpsfield Neighbourhood Plan 2019 and Woldingham Neighbourhood Plan 2016, as well as the Surrey Waste and Minerals Plans¹. Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004 require decisions to be taken in accordance with the development plan, unless there are material considerations that indicate otherwise.
- 6.3 The NPPF is a material consideration in planning decisions and its policies have to be taken into account in dealing with applications from the day of its publication, [with the exception of policy in paragraph 76 relating to the five-year housing land supply] (NPPF December 2023, paragraphs 2 and 224). It is important to note that even though the
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adopted Development Plan predates the publication of the most recent NPPF, the majority of policies remain up to date. Policies will be given due weight in accordance with their degree of consistency with the NPPF (December 2023, paragraph 225).

6.4 The evidence base published alongside the emerging Local Plan 2033 does not form part of the Development Plan. The eventual non-adoption of the emerging Local Plan does not place more or less weight on the emerging Local Plan 2033 evidence base than on any other evidence base published by the Council. Until such time that evidence base studies are withdrawn, they remain capable of being a material consideration for planning applications.

6.4 Tandridge District Core Strategy (2008)

CSP1 - Location of Development
CSP2 - Housing Provision
CSP3 - Managing the Delivery of Housing
CSP4 - Affordable Housing
CSP7 - Housing Balance
CSP12 - Managing Travel Demand
CSP13 - Community, Sport and Recreation Facilities and Services
CSP14 - Sustainable Construction
CSP15 - Environmental Quality
CSP17 - Biodiversity
CSP18 - Character and Design
CSP19 - Density
CSP21 - Landscape and Countryside

6.5 Tandridge Local Plan Part 2: Detailed Policies 2014-2029 (2014)

DP1 - Sustainable Development
DP5 - Highway Safety & Design.
DP7 - General Policy for New Development
DP10 - Green Belt
DP13 - Buildings in the Green Belt
DP18 - Community, Sports & Recreational Facilities
DP19 - Biodiversity, Geological Conservation & Green Infrastructure
DP20 - Heritage Assets
DP21 - Sustainable Water Management
DP22 - Minimising Contamination, Hazards and Pollution

6.6 Caterham, Chaldon and Whyteleafe Neighbourhood Plan 2018 to 2033 (2021)

CCW4 - Character of Development
CCW5 - Design of Development
CCW6 - Environmentally Sustainable Design
CCW10 - Locally Significant Views

6.7 Other Tandridge Guidance

Tandridge Parking Standards Supplementary Planning Document (2012)
Trees and Soft Landscaping Supplementary Planning Document (2017)
Tandridge Housing Delivery Test Action Plan (2022), including the Tandridge Interim Policy Statement for Housing Delivery.

7.0 Key Issues

- 7.1 The site is located in the Green Belt and the residential development proposed in this application would constitute inappropriate development which paragraph 152 of the NPPF provides is by definition harmful to the Green Belt and should not be approved except in very special circumstances (VSC). Paragraph 153 of the NPPF provides that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. VSC will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

Other key considerations include:

- The provision of housing and affordable housing and the proposed housing mix.
- The locational sustainability of the proposed development.
- The effect on the character and appearance of the area.
- The effect on heritage assets.
- The amenities of nearby residents.
- The impact on other surrounding land uses.
- The living conditions of future occupiers.
- Traffic, highway safety, access and parking provision
- Trees and Tree Protection
- The effect on biodiversity and habitats.
- Flood Risk and Surface Water Drainage
- Contaminated Land
- Other Material Considerations.

- 7.2 Once each of these key issues have been considered, it will be necessary to undertake an exercise of weighing any harm that has been identified against any benefits of the proposal that are identified and undertake an exercise of assessing the planning balance.

7.3 Green Belt

Inappropriate Development

- 7.4 The NPPF supports the protection of Green Belts and the restriction of development within these designated areas. The NPPF states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open, with the essential characteristics of the Green Belt being its openness and permanence.
- 7.5 The NPPF states that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt and lists a number of exceptions.
- 7.6 Policy DP10 of the Local Plan reflects the NPPF in setting out that inappropriate development in the Green Belt is, by definition, harmful and that substantial weight must be attributed to this harm. Permission should only be granted where very special circumstances can be demonstrated to outweigh the harm by reason of inappropriateness and any other harm identified.
- 7.7 Policy DP13 states that unless very special circumstances can be clearly demonstrated, the Council will regard the construction of new buildings as inappropriate in the Green Belt. Policy DP13 sets out the exceptions to this.

7.8 Paragraph 153 of the NPPF does indicate that some types of development can be considered as exceptions to inappropriate development, including:

g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:

– not have a greater impact on the openness of the Green Belt than the existing development; or

– not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

Whilst limited parts of the application could potentially be considered to be previously developed land (the areas of hardstanding and the area where the workshops were located), the majority of the site would clearly not fall within the definition of previously developed land contained within the Annex to the NPPF, and, in any event, the proposed development would have a much greater impact on the openness of the Green Belt.

7.9 Therefore, none of the exceptions set out within national or local planning policy are applicable to the buildings that are proposed within this application. The erection of buildings at the site is, therefore, inappropriate development in the Green Belt

Openness

7.10 The fundamental aim of Green Belt Policy is to prevent urban sprawl by keeping land permanently open. The Framework advises at Paragraph 142 that openness and their permanence are essential characteristics of Green Belts. Planning Practice Guidance states that undertaking an assessment of the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case having regard to factors that include, but are not limited to:

- *openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;*
- *the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
- *the degree of activity likely to be generated, such as traffic generation.*

7.11 With respect to the spatial dimension, the proposal would represent the erection of buildings where virtually none currently exist. Consequently, the development would have a substantial impact on openness in this respect.

7.12 The proposal would introduce built development volume in the form of dwellings and supporting development including public highways, driveways, gardens and boundary enclosures. These would extend across a substantial part of this currently undeveloped site. The buildings would be up to three storeys in height and, as a result of the number of buildings proposed, there would be a substantial imposition of built form whether this is considered in terms of its volume or footprint. This change would be accompanied by increased activity from prospective occupants and visitors reasonably associated with a residential use.

- 7.13 Turning to the visual impact of the development, it is the case that some of the proposed development would be screened by existing vegetation and tree planting along the southern and eastern boundaries of the site, but more open views would be available along the western boundary from existing residential properties and more particularly from the north where Kenley Aerodrome is located. Views would also be available to those using Victor Beamish Avenue, such as those accessing the school.
- 7.14 The proposal would, therefore, reduce both the visual and spatial sense of openness of this Green Belt area, causing harm that ranges from significant to moderate. The harm arising in this respect is required to be afforded substantial weight.

Purposes of the Green Belt.

- 7.15 Paragraph 143 states that the Green Belt serves 5 purposes:
- a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another;
 - c) to assist in safeguarding the countryside from encroachment;
 - d) to preserve the setting and special character of historic towns; and
 - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 7.16 The Planning Statement submitted with the application refers to the five identified purposes of the Green Belt and indicates, in respect of purpose a), that the application site is considered to “make a “limited” contribution towards meeting purpose (a) and that the wider Green Belt would continue to ensure this, so the harm to Green Belt is limited.
- 7.17 Caterham on the Hill is a built-up area but not a large one and, as such, the sprawl caused by this proposal at the edge of the settlement is not considered to significantly conflict with the requirement of purpose a) and the Council would agree that harm in respect of this purpose would be limited.
- 7.18 The development would be located between Caterham on the Hill and Whyteleafe and would result in a reduction in the gap between these settlements to some degree, but only on a localised basis. As such, it is not considered that the proposal would result in a perception that the neighbouring towns would be merging into one another. As such, it is not considered the proposal would significantly conflict with purpose b).
- 7.19 The applicants Planning Statement acknowledges that the Green Belt Assessment undertaken by the Council as part of the evidence base for the Local Plan 2033 states that the application site (known as site AA1) “prevents Caterham-on-the-Hill and Whyteleafe from merging with Kenley” but indicates that “the size and location of this site means it is considered to only partially meet purpose (b)” but no further explanation of this conclusion is provided.
- 7.20 In respect of purpose c) the Planning Statement suggests that the proposed development “will not erode the open countryside between Kenley ... and Caterham as there are extensive protection measures in place for the main airfield” and that overall “it is considered the site makes a limited contribution to serving purpose (c).” Nevertheless, it is considered that the development would clearly represent the further encroachment of built development into the open countryside. Therefore, conflict would arise with respect to purpose c).

- 7.21 In respect of purpose d) the Planning Statement again draws upon the Council's earlier Green Belt Assessment and states that:

"The site is not within or in close proximity to an historic town but given the site is located within a Conservation Area and in proximity of designated heritage assets, consideration is given to this purpose.

Appendix D of the Green Belt Assessment Part 1 Paragraph D.5.31 states that "*the Conservation Area is bordered on three sides by development and so long distance views to the Conservation Area are limited.*"

Appendix D of the Green Belt Assessment Part 1 Paragraph D.5.32 states "*the parcel does not complement the setting of the Kenley Conservation Area as the Conservation Area is bordered on all three sides within Tandridge by development.*" However, Part 3 considers there to be potential harm.

The current site is clearly a reflection of its former past and the outline scheme draws on this rich military heritage to preserve and enhance key characteristics of the conservation area and wider site, including the Grade II listed former Institute Building (former NAAFI).

The submitted Heritage Assessment provides a detailed view of the scheme and the degree of harm to the Kenley Aerodrome Conservation Area, assessing how the scheme preserves and enhances the setting. The Heritage Statement acknowledges that whilst there would be some residual impact on the character and appearance of the Kenley Aerodrome Conservation Area stemming from the introduction of residential development and increased suburban density, the current condition of the site offers an opportunity to enhance the setting of the designated heritage assets and key elements of the scheme contribute positively to their setting, retaining and celebrating their character and appearance.

Overall, it is considered the current site and its current condition makes a moderate contribution to serving purpose (d)."

- 7.22 The Council would not dispute that the site does contribute to serving purpose d).

- 7.23 In respect of purpose e) the Planning Statement states that:

The site is located in the Green Belt and the former use of the site as an airbase and its associated activities likely pre-date the designation of the land as Green Belt. The application site, surrounding the NAAFI listed building which is now a school, represents the recycling of redundant and derelict previously developed land and so we support the Council's recommendation to remove this site from the Green Belt so that it can fulfil this purpose.

Green Belt Summary

- 7.24 As discussed above, it is considered that the proposed development would comprise inappropriate development within the Green Belt which would have a greater impact on openness than the existing development on the site. The proposal would also cause limited to moderate harm to openness and cause moderate conflict with other purposes of the Green Belt.

- 7.25 In such circumstances, and in accordance with paragraph 152 of the NPPF, inappropriate development is, by definition, considered harmful to the Green Belt and

should not be approved except in very special circumstances. Paragraph 153 of the NPPF goes on to state that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' (VSC) will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

- 7.26 The NPPF (December 2023) does not provide guidance as to what can comprise 'very special circumstances'. However, some interpretation of very special circumstances (VSC) has been provided by the Courts. The rarity or uniqueness of a factor may make it very special, but it has also been held that the aggregation of commonplace factors could combine to create very special circumstances (i.e. 'very special' is not necessarily to be interpreted as the converse of 'commonplace'). However, the demonstration of very special circumstances is a 'high' test and the circumstances which are relied upon must be genuinely 'very special'. In considering whether 'very special circumstances' exist, factors put forward by an applicant which are generic or capable of being easily replicated on other sites, could be used on different sites leading to a decrease in the openness of the Green Belt. The provisions of very special circumstances which are specific and not easily replicable may help to reduce the risk of such a precedent being created. Mitigation measures designed to reduce the impact of a proposal are generally not capable of being 'very special circumstances'. Ultimately, whether any particular combination of factors amounts to very special circumstances will be a matter of planning judgment for the decision-taker.

Inappropriate Development and Very Special Circumstances:

- 7.27 The main basis of the applicant's submission in respect of the acceptability of the proposed development in Green Belt terms is that the application site constitutes 'previously developed land' under the terms of the NPPF. The submitted Planning Statement indicates that the applicant considers that:

"The site is clearly and demonstrably previously developed land when assessed against all definitions and clearly will not cause substantial harm to the openness of the Green Belt and will contribute to identified affordable housing need in TDC. ... the proposed development falls under Paragraph 149(g)" (now Paragraph 154 g)) "of the NPPF and is an exception to inappropriate development in the Green Belt. The scheme therefore passes national policy tests and should be approved without delay."

- 7.28 The NPPF, in Annex 2, defines previously developed land as follows:

Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

- 7.29 Whilst the views of the applicant are noted, it is considered that only a relatively small proportion of the application site actually constitutes previously developed land. These areas comprise roughly 1,075 square metres of hardstanding located abutting the northern boundary of the site and to the east of the Victor Beamish Avenue access to

the operational aerodrome, and the two remaining derelict workshop buildings around 150 metres to the north of the former NAAFI building, with areas of 395 square metres and 436 square metres. In addition, there are some areas of access roads and other small hardstandings. The rest of the site comprises woodland and soft landscaped areas, and a former playing field to the south of the NAAFI building. It is therefore considered that less than half the application site area (of 4.74 hectares) constitutes previously developed land.

7.30 Whilst it is acknowledged that the application site did historically lie within the curtilage of Kenley Aerodrome the majority of the operational development that may have previously existed has now 'blended into the landscape'.

7.31 As such, it is not agreed that the whole of the application site constitutes previously developed land as defined by the NPPF and therefore the majority of the site would not fall within the remit of paragraph 154 g) of the NPPF.

7.32 It is, therefore, considered to be necessary to establish whether any very special circumstances exist that would outweigh the harm caused to the Green Belt by the inappropriate development proposed.

7.33 The submitted Planning Statement does address this position and states that:

"However, should an alternative position be adopted by the decision maker" (sic) "and the proposed residential development constitute inappropriate development in the Green Belt and by definition causes significant harm to its openness, the application should be considered in the light of Paragraph 148" (now Paragraph 154) "of the NPPF. Therefore, a further assessment of the proposed development is provided below to demonstrate very special circumstances, where the benefits clearly outweigh the harm to the Green Belt and any other identified harm."

The Statement puts forward the following three very special circumstances in support of the proposal:

- *Previously Developed Land and Lack of Alternative Sites*
- *Character of the Scheme and the Heritage Benefit*
- *Socio-Economic Benefit*

7.34 The Previously Developed Land issue has been discussed above and is not considered to be of significance in respect of the majority of the application site. The Lack of Alternative Sites is commented upon below in the Housing Supply section.

7.35 The Character of the Scheme and the Heritage Benefit issue is also discussed below in the Impact on Heritage Assets section.

7.36 The Socio-Economic Benefit of the proposal through the provision of housing, as a result of employment during the construction period and as a result of an increase in subsequent local household expenditure and demand for services are acknowledged. The additional population would increase spending in the local economy and would provide support for local shops and services, supporting a prosperous economy. This is a key objective of the NPPF would represent economic benefits that would carry moderate weight.

- 7.37 Furthermore, the Council's Interim Policy Statement for Housing Delivery – September 2022 (IPSHD) is a material consideration, and the following matters also require appropriate consideration:

Housing Need and Requirement

- 7.38 For plan-making, paragraph 61 of the NPPF (December 2023) explains that strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance.
- 7.39 Interim calculations, based on the standard methodology as prescribed by DLUHC and an interim Housing Market Area comprising the whole of Tandridge District, show the minimum annual local housing need for TDC is estimated to be 639 dwellings.
- 7.40 NPPF (December 2023) paragraph 61 explains that the outcome of the standard method is *an advisory starting-point for establishing a housing requirement for the area.*'
- 7.41 Tandridge District has major policy constraints, including Green Belt covering 94% of the District, two Areas of Outstanding Natural Beauty (National Landscapes), and extensive areas subject to flooding, and significant infrastructure capacity constraints (for example around the M25 J6 and other parts of the strategic road network) within the District all of which can reasonably be expected to significantly reduce the housing requirement.
- 7.42 Such a reduction was accepted at the Examination for 'Our Local Plan 2033'. A final conclusion on Objectively Assessed Need (OAN) was not reached due to cessation of the Examination, however OAN was calculated as ranging between 266 and 470, depending on the choice of annual population projections, substantially less than the estimated Local Housing Need of 639 resulting from the standard method. The Inspector concluded that the housing requirement should be less than OAN, as defined in the 2012 NPPF, due to a number of factors, including the degree of major policy constraints within the District:

'It is clear to me that there are specific policies of the Framework which indicate that development should be restricted in Tandridge and that in principle, the Plan would be sound in not meeting the OAN in full.' (Inspectors Report, Annex 1 - ID16, paragraph 44).

- 7.43 Whilst subsequent revisions to the NPPF have introduced the concept of local housing need, the Council nevertheless fully anticipates that the likely future housing requirement will similarly be lower than the local housing need due to the presence of the constraints outlined above.

Housing Supply

- 7.44 Currently, the five-year housing land supply calculation requires the use of the unconstrained housing need figure which is based on the standard methodology. When this unconstrained housing need figure is used, the Council accepts that it does not have a five-year housing land supply (5-YHLS).
- 7.45 However, for the reasons already set out regarding the housing requirement, a five-year housing land supply figure based on the unconstrained housing need figure is not appropriate in the case of Tandridge District.

- 7.46 Nevertheless, the Council is committed to bringing forward new housing sites in line with criteria set out in its Interim Policy Statement for Housing Delivery which was adopted as part of the Housing Delivery Test Action Plan.
- 7.48 The Council published a Housing Delivery Test Action Plan (HDTAP) in September 2022, which is a material consideration in the assessment of planning applications. As part of the HDTAP, the Council adopted the Interim Policy Statement for Housing Delivery which sets out a list of criteria for new housing sites. In addition to assessing applications against the Development Plan and national policy and guidance, this application has been assessed in relation to the criteria. The proposed site is not considered to be aligned with the criteria set out in the Interim Policy Statement, which is a material consideration for this application. The IPS states that applications are invited to come forward that meet the specified criteria. Criterion (ii) is housing sites included in the “emerging Local Plan” where the Examiner did not raise concerns. The Inspector did raise concerns in respect of the application site (HSG06), noting that he considered the allocation unjustified as further evidence had not been provided with regards to the concerns he raised regarding heritage.

Specifically, the Inspector’s Report, at paragraph 75, stated:

In respect of the proposed allocations, in ID16 I asked the Council to provide further evidence in respect of HSG02: Chapel Road and HSG04: Woodlands Garage, Chapel Road, Smallfield as both sites fall within Flood Zone 3B (the functional floodplain) and the evidence before me was insufficient to demonstrate that both elements of the Exception Test (NPPF102) have been passed. I also requested further evidence regarding HSG06: Land off Salmons Lane West, Caterham and HSG12: Land at the Old Cottage, Station Road, Lingfield in respect of the effect of the proposals on designated heritage assets. I have not received the requested information and therefore continue to consider these allocations unjustified.

Within Annex 1 – ID 16, paragraph 52, it is further stated that:

HSG06: Land off Salmons Lane West, Caterham (submitted Plan estimated site yield 75 dwellings)

The proposed allocation falls within the Kenley Aerodrome Conservation Area and the settings of a number of designated heritage assets. In order for me to be able to reach a view on the soundness of the proposed allocation, please provide me with your assessment of the significance of the heritage assets for which there is potential for the allocation to cause harm, and an assessment of the effect of the proposed allocation on the significance of the heritage assets.

- 7.49 The Council is committed to bringing forward new housing sites in line with criteria set out in its Interim Policy Statement for Housing Delivery. This Statement indicates that:

“This is an interim Policy Statement for Housing Delivery providing a consistent approach for Development Management for the determination of housing applications in Tandridge District going forward and will include consideration of the matters set out below.

The primacy of the protection of the Green Belt, Surrey Hills Area of Outstanding Natural Beauty (AONB) and the High Weald AONB, candidate areas for AONB status will be the key planning consideration in determining planning applications under this interim Policy.

Infrastructure constraints, such as local, strategic and national route highway capacity constraints and foul or surface water drainage constraints, will be key planning consideration in determining planning applications under this interim Policy.

Applications will be invited to come forward that meet the following criteria and are in accordance with the Council's development plan and with the National Planning Policy Framework (NPPF) and with national planning guidance:

i) Provide for the re-development of previously developed land in the urban areas and the Green Belt;

ii) Housing sites included in the emerging Local Plan where the Examiner did not raise concerns ...; ..."

The Statement further states, amongst other things, that:

"All development proposals will be expected to comply with the requirements of the NPPF and the policies of adopted development plan, that is the Core Strategy (15th October 2008), Tandridge Local Plan Part 2: Detailed Policies 2014-2029 (July 2014), all adopted Neighbourhood Plans and Supplementary Planning Guidance where relevant.

Planning permission will only be granted for a limited period of 2 years to ensure the rapid development of the sites.

When considering planning applications for residential development on a specific site, the cumulative impact of development (and particularly wider highway capacity and safety considerations) will need to be taken into account.

Applications should be accompanied by Master Plans setting out how the site will be developed, the location of infrastructure, how the site will function, its visual appearance, how it relates to the surrounding area, and the adjacent transport network including roads, footways, cycleways and bridleways."

- 7.50 In respect of the application proposal it is considered that whilst the development may accord with some aspects of the Interim Policy Statement it does conflict with other aspects. Whilst part of the site may be considered to constitute previously developed land, a significant proportion does not. It is also acknowledged that the site was included in the emerging Local Plan, but the Examiner did raise concerns about the heritage issues. The development is also considered to raise concerns regarding highway capacity issues. As such, the development proposal is not considered to accord with the requirements of the Interim Policy Statement.

Housing Mix

- 7.51 The proposal would result in a net increase of 80 residential units on the site. Policy CSP7 requires that development of five or more dwellings should contain an appropriate mix of dwelling sizes having regard to the needs to the particular area. The Council's Strategic Housing Market Assessment SHMA (2015) identifies a need for 1, 2, 3 and 4+ bedroom dwellings to be provided at rates of 10%, 26%, 35% and 29% respectively.

- 7.52 The proposed development includes the following:

	Total	% of total
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2 Bedroom	12	15
3 Bedroom	57	71.25
4 Bedroom	7	8.75
5 Bedroom	4	5
Totals	80	

- 7.53 Whilst not aligning entirely with the requirement that is set out within the SHMA, it is considered that the total housing provision would align with the requirements of the District to an acceptable degree and, therefore, accord with the abovementioned policy requirement.

Affordable Housing

- 7.54 Policy CSP4 states that a target of 50 affordable dwellings per year was set between 2007 and 2012 but that this would be reviewed thereafter. A target of up to 34% affordable dwellings was set within individual developments, where applicable, with up to 75% of the affordable housing on a site being social rented. However, the Policy states that the precise proportions will be agreed with the Council having regard to the specific needs at the time and within the area.
- 7.55 The proposal would result in the provision of 32 affordable residential units on the site comprising of 9 x 2-bed terraced houses and 23 x 3-bed houses. All of the affordable housing would consist of affordable rented units. It is considered relevant to note that the affordable housing offer in this application equates to 40% of the proposed units and that this exceeds the Development Plan Policy requirement under CSP4.
- 7.56 No specific reference to the provision of affordable housing as a very special circumstance in Green Belt terms has been made by the applicant however with only a brief reference to this issue being made in the Summary of the Planning Statement indicating that: *“The delivery of 34 affordable housing units,”* (now 32 units due to the reduction in overall unit numbers) *“exceeds the adopted local policy requirement for 34% affordable housing and in the context of the above, will contribute significantly to addressing the identified extremely serious affordable housing land supply and delivery deficits. This equates to four additional affordable homes than the Council has anticipated in the draft site allocation.”*

Overall Assessment of Very Special Circumstances

- 7.57 In this case, it is considered that substantial harm would arise from the inappropriate development proposed and the associated reduction in openness in Green Belt terms. There would also be conflict with the purposes of the Green Belt. These are three important elements contributing to the substantial weight that should be afforded to the actual and definitional harm to the Green Belt.
- 7.58 A Court of Appeal judgment (*SSCLG & Others v Redhill Aerodrome Ltd* [2014] EWCA Civ 1386) has confirmed that the interpretation given to any other harm in what is now paragraph 153 of the Framework is such that it is not restricted to harm to the Green Belt. There would be significant harm to the landscape character of the area given the location of the application site in this case.
- 7.59 The other considerations are weighted as follows: significant weight for the provision of both market and affordable housing; moderate weight for the socio-economic benefits; and limited weight to enhanced access to the site and surrounding countryside. The previously developed land issue put forward by the applicants is considered to attract limited weight, given that the majority of the application site is not

considered to fall within the NPPF definition. Similarly, the character of the scheme and the heritage benefits issues put forward are not considered to have been fully detailed in this Outline submission and therefore can only attract, at best, limited if any weight.

- 7.60 Regard has been had to all other benefits. However, these do not clearly outweigh the harm identified. Consequently, the very special circumstances necessary to justify the proposed development do not exist. The proposed development would therefore conflict with Local Plan Detailed Policies DP10 and DP13, and the requirements of chapter 13 of the Framework which have been summarised above.

Other Issues

The Locational Sustainability of the Proposed Developments.

- 7.61 Policy CSP1 states that, in order to promote sustainable patterns of travel and in order to make the best use of previously developed land, development will take place within the existing built up areas of the District (the Category 1 settlements listed in the development plan) and be located where there is a choice of mode of transport available and where the distance to travel to services is minimised subject to the third paragraph of this policy.
- 7.62 The application site is located within the Green Belt but is in relatively close proximity to Caterham. There are bus stops nearby with services 409 (Selsdon – East Grinstead); 411 (Warlingham – Caterham – Reigate) and 657 (Whyteleafe Station- St Bede’s School). Whyteleafe South, Whyteleafe and Upper Warlingham railway stations are located to the east some 1.6 km, 2.5km and 2.7 km from the site.
- 7.63 The application has been accompanied by a Transport Assessment which has been reviewed by Surrey County Council – Highways who have commented as follows:

Table 3.3 within the Transport Assessment (TA) demonstrates that local amenities, in particular including food retail, are mostly located in excess of a half-hour return journey by foot and walking this route during the site visit undertaken by the CHA demonstrated that the actual journey times are longer than those indicated in the TA, partly due to the additional time spent attempting to cross over roads along the route. Given overall distance to local amenities and the lack of dedicated cycle infrastructure, residents are far more likely to make regular journeys to local amenities by car.

The TA provides details of likely mode share using 2011 Census journey to work data for the Middle Super Output Area (MSOA) of Tandridge 003 in Table 5.2. This data supports the above assessment in that it demonstrates only a 7% mode share for walking and 1% for cycling. It should be noted that the site is at the northern end of the MSOA and that the majority of people within the dataset would live closer to the local amenities than residents of the proposed development would. As such, it is likely that the actual mode share of the proposed development would likely include even lower figures for walking and cycling.

The TA states that residents of the proposed development would not be reliant on the private car on the basis of the 15% mode share for rail indicated by the 2011 Census Data. This does not account for how residents would be travelling to and from the railway station, however. Paragraph 3.21 acknowledges that the residents are not likely to travel by foot to the railway station and claims that they will instead cycle however this is considered equally unlikely given the lack of suitable infrastructure between the development and the station, particularly along Salmons Lane, and that

return journeys would be uphill. It can therefore be reasonably concluded that the 15% of residents expected to commute by rail would be most likely to travel to the station by private car.

It should further be noted that there is limited parking availability at the nearby railway stations and that the proposed development would likely result in vehicles parking on the public highway in potentially unsuitable locations. Were the proposals to be granted consent against this recommendation, further consideration should first be given to assessing this issue. This is particularly the case for Whyteleafe South Station, which is the nearest to the site.

The proposed improvements to bus stop infrastructure are welcomed and appropriate however table 3.1 in the TA shows that the available services run only hourly, reducing the likelihood of any significant mode share for bus journeys being achieved. This conclusion is supported by the Census data presented in table 5.2, which shows a 6% mode share for bus, minibus and coach.

They therefore conclude that the site is located in an unsustainable location in transport terms, where the only realistic means of transport would be the private car, due to the distance to local amenities, the lack of suitable pedestrian and cycle connections to those amenities, and the limited availability of accessible public transport services.

The Effect on Character and Appearance of the Area

- 7.64 The NPPF states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. It goes on to state that planning decisions should ensure that developments will function well, add to the overall quality of the area, be sympathetic to local character and history (whilst not discouraging innovation) and establish a strong sense of place. It also states that development that is not well designed should be refused.
- 7.65 Policy CSP18 of the Core Strategy requires that new development should be of a high standard of design that must reflect and respect the character, setting and local context, including those features that contribute to local distinctiveness. Development must also have regard to the topography of the site, important trees or groups of trees and other important features that need to be retained.
- 7.66 Policy DP7 of the Local Plan Part 2: Detailed Policies requires development to, inter alia, respect and contribute to the distinctive character, appearance and amenity of the area in which it is located, have a complementary building design and not result in overdevelopment or unacceptable intensification by reason of scale, form, bulk, height, spacing, density and design.
- 7.67 Policy CSP21 of the Tandridge District Core Strategy 2008 advises that the character and distinctiveness of the Districts landscapes and countryside will be protected for their own sake and that new development will be required to conserve and enhance landscape character.
- 7.68 The application has been submitted in Outline and, whilst indicative details have been provided, the details of the design and layout of the development have not been submitted for detailed consideration.

- 7.69 Overall, it is considered that the development would, however, have a localised visual impact but, from where it would be seen the development would have a noticeable and substantial visual impact on the character at the fringe of Caterham-on-the-Hill. This would conflict with the abovementioned policies, particularly Policy DP21, albeit the extent of harm arising in this respect is considered to be likely to be limited.

The Effect on Heritage Assets.

- 7.70 Section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 confirms that, in considering whether to grant planning permission or permission in principle for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses, and Section 72 (1) of the same Act confirms that, in the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.
- 7.71 Section 16 of the NPPF, 'Conserving and enhancing the historic environment', advises that heritage assets range from sites and buildings of local historic value to those of the highway significant, such as World Heritage Sites. These assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. The NPPF advises that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The NPPF adds that LPAs should identify and assess the particular significance of any heritage asset that may be affected by a proposed (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise.
- 7.72 Policy DP20 of the Local Plan (2014) relates to 'Heritage Assets' and sets out that there will be a presumption in favour of development proposals which seek to protect, preserve and wherever possible enhance the historic interest, cultural value, architectural character, visual appearance and setting of the District's heritage assets or historic environment. With the granting of permission or consent, criterion C requires that the works proposed should be sympathetic to the heritage asset and /or its setting in terms of quality of design and layout and material and in the case of Conservation Area, should conserve or enhance the character of the area and its setting.

Conservation Area

- 7.73 The site lies within the Kenley Aerodrome Conservation Area which was designated on 7th December 2005. The conservation area straddles the boundary between the London Borough of Croydon and Tandridge District Council with its protection requiring the designation of two separate yet abutting Conservation Areas. The area within Croydon was designated on 9th January 2006.
- 7.74 The application site lies within Sub Area 2 – Institute Building and former Parade Ground as defined within the Conservation Area Proposals Statement.
- 7.75 The area is described as follows:

The second area, also in Tandridge, is the area that surrounds the former Institute building (the NAAFI) and workshop building. This area comprises open ground, part of which formed the former parade ground. The Institute building is also Listed as Grade II. Planning Permission has been granted to use the building for educational purposes. The workshop building is not listed. Planning Permission has been granted to use it as a meeting room. Work has started on the conversion but unfortunately the building has suffered a partial collapse during the works. The area immediately around the workshop building has piles of hardcore and other material deposited. The wider surrounds of this building consists of large areas of hardstanding, which under the current consent would be available for car parking. The land south of the former parade ground area at the southern end of the site close to the main entrance has been top-soiled in preparation for being laid to grass.

At the northern end of this area there is a small area of Ministry of Defence Land that is used by Air Training Corps. This area contains several temporary buildings of a neutral character. Beyond this area to the north is the main Airfield (in Croydon)

There is no public access to the area, but it is visible through the entrance onto Salmons Lane West and from the existing and new residential properties to the west.

The Council's main objectives for this area is to preserve the Institute building and to ensure that any reuse of the building and the surrounding land, including any new development that might be acceptable under Green Belt policy, would preserve and enhance the appearance of the area. The owners of the area around the Institute Building (a church group) will be asked to tidy the land and ensure that the area is properly landscaped as part of the authorised development. The Council is in discussion with the owners regarding the reconstruction of the unlisted workshop building and any required works should preserve and enhance the quality, character and appearance of the area.

The former married quarters areas to the west, which were excluded from the Green Belt as part of the Tandridge District Local Plan are currently being redeveloped with new housing and are not included within the Conservation Area.

- 7.76 The Proposals Statement also includes a section providing development guidelines. This guidance states:

Both respective Council's planning policies as well as Planning Policy Guidance Note 15 Planning and the Historic Environment (PPG15) will be taken into account when considering development proposals in the area. The emphasis will generally be on the controlled and positive management of change, ensuring that any new development accords with the area's special architectural or historic interest.

Therefore all planning applications for development proposals in the Kenley Aerodrome Conservation Areas must preserve and enhance the area's character and appearance, and consider views into and out of the area. Development on nearby sites should also take into account the effect on the Conservation Areas.

The Conservation Areas contain limited sites suitable for future redevelopment mainly because the site lies within the Green Belt. It is not considered that the main part of the airfield is suitable for development other than uses associated with the functioning of the airfield and proposals for improving public access. The only areas suitable for reuse are in areas 1 and 2 (Tandridge) where the main constraints will be protection

and enhancement of the listed buildings and their settings, and the overall character and integrity of the Conservation Areas.

Both Council's recognise that designation as a Conservation Area should not stifle positive change, however emphasis is placed on protecting the character of the aerodrome and those buildings which contribute to the character of the area. New development should not necessarily aim to slavishly copy details of adjacent buildings. Instead, both Councils will expect that new development within the area displays a sensitivity to its visual and historical context in terms of massing, materials and detail, with carefully designed contemporary structures and carefully considered interpretations of traditional styles, using quality sustainable materials. Great skill and imagination is necessary to design buildings that do not resort to pastiche but are nevertheless sympathetic to the character of the area.

The design quality, site appraisal and consideration of context for new development proposals should be illustrated within a Conservation Area Design Statement, submitted with planning application drawings.

Listed Buildings

- 7.77 The development site surrounds the Former Dining Room and Institute at former RAF Kenley, which is a Grade II listed building and was first listed in January 2001. The listing description states:

“Institute and dining room. 1932 design by the Air Ministry's Directorate of Works and Buildings. Stretcher bond brick to cavity walls, concrete floors, slate roof on steel trusses. PLAN: a long narrow principal range in two storeys, with short returned wings to the front, facing the former parade ground, and containing the dining rooms for 591 airmen (ground floor) and corporals (first floor), with reading rooms and games areas. Entrance at each end of wings containing large staircase wells. To the rear, mainly on one floor, but with a two-storey staff accommodation building, are the kitchens, boiler room and general services.

EXTERIOR: glazing-bar sashes (boarded) to brick voussoirs and stone sub-sills. The parade ground front is symmetrical, with a recessed five-bay centre having 12-pane above 16-pane sashes. The short wing returns have a 12-pane sash above a pair of flush doors to a plain overlight, in stone pilaster surround with cornice. The outer ends of these wings have a closed pediment with small ventilation slit, above a full-height Portland stone panel containing a 16-pane sash above an oculus with square grid, all with moulded surrounds, and to a sill on brackets above plain apron panel; these wings also have a small plinth in stone. The return ends are identical, with a closed-pediment gable above 8/12/8-pane sashes above central doors flanked by small eight-pane sashes, the ground-floor openings with moulded stone architraves and cornice. The forward projecting wings have a 12-pane sash at first floor, and four small lights to the ground floor. The rear wall of this main block has a closed pediment gable near the left-hand end, with a single 12-pane, then eight 12-pane sashes at first floor, above the various service buildings. Eaves are to a flat soffit and moulded cornice or gutter, and the gabled ends have 'rusticated' quoins forced by recessing one in every five courses. Hipped roofs to all units of rear service range, which comprise five-bay two-storey block with central entry to service yard and flanking lower wings.

INTERIOR: dog-leg stairs with steel balusters, otherwise no internal detail of note.

HISTORY: The careful proportions of this building reflect the impact of Air Ministry

consultation with the Royal Fine Arts Commission. In contrast to the Battle of Britain sector stations at Biggin Hill and Northolt, Kenley has lost most of its buildings but boasts the most complete fighter airfield associated with the Battle of Britain to have survived. A large part of Kenley Common, managed by the Corporation of London, was converted for use as an aerodrome for the Royal Flying Corps in 1917 and enlarged through an Act of Parliament in 1939. The 800-yard runways and perimeter tracks completed in December 1939 (extended by a further 200 yards in 1943) and all 12 of the fighter pens under completion in April 1940 have survived: this is a uniquely important survival, and one that relates to a military action of world historical importance. At the end of March 1939, the Air Ministry had agreed to Sir Hugh Dowding's proposals for all-weather runways and perimeter tracks for critical fighter bases prone to waterlogging, mostly those in 11 Group in the south east of England. In the following month it was agreed that fighter stations should have dispersals for three squadrons of 12 aircraft each, subsequent to which fighter pens with blast-shelter walls and internal air-raid shelters were erected on key fighter airfields: the designs, in which Dowding had taken a close interest since trials in August 1938, had already been established by Fighter Command Works.

Despite the demolition of the perimeter pillboxes in 1984, the survival, character and importance of Kenleys' flying field as a uniquely well-preserved Battle of Britain site is thrown into sharper relief when it is realised that it was subject, on the 18th of August, to one of the most determined attacks by the Luftwaffe on a sector airfield, photographs of which - including an attack on a fighter pen - were afterwards printed in Der Adler magazine. During this raid, three personnel were killed and three hangars and several aircraft destroyed. 39 personnel were killed and 26 wounded on the 30th of August, raids on the following day damaging the operations block. Its scars can still be read in the form of post-war repair work to the officers' mess, prominently sited on the west side of the aerodrome, and which now stands as the most impressive surviving building dating from the rebuilding of the station between 1931 and 1933. The last surviving hangar and the control tower were destroyed by fire in 1978, and the sector operations block was demolished in 1984.

(Operations Record Book, PRO AIR 28/419, includes series of block plans showing completion of new airfield layout in late 1939; Peter Corbell, Kenley, in W.G. Ramsey (ed), The Battle of Britain Then and Now, (5th edition, London, 1989); Peter Flint, RAF Kenley. The Story of the Royal Airforce Station, 1917-74 (Lavenham, 1985); Alfred Price, Battle of Britain: The Hardest Day (London, 1979))

Listing NGR: TQ3317857315

- 7.78 To the northeast of the application site is the Former Officers Mess at former RAF Kenley which is also Grade II listed.
- 7.79 Overall, it is considered that the proposed development would have an adverse impact on the setting of the former NAAFI building due to the proximity of new residential development around it and the potential scale of the development. Whilst it is acknowledged that historically there would have been built development around the listed building such development would have been in the form of single storey barrack blocks and similar relatively small-scale single storey structures in the form of ancillary buildings associated with the operational use of the aerodrome. These structures would have been clearly subservient to the scale of the NAAFI building and would not have had an appearance, scale and massing that would compete with the two-storey NAAFI building.

- 7.80 The proposal would, however, not result in any direct harm to the character and setting of the former Officers Mess building.

Non-Designated Heritage Assets

- 7.81 The proposed development would result in the loss of one (possibly two) former workshop building which appears to be in a semi-derelict state. In line with the guidance in paragraph 209 of the NPPF a balanced judgement is required having regard to the scale of any harm or loss and the significance of the heritage assets as a result of the loss of the non-designated heritage assets.
- 7.82 The total loss of the workshop(s) will have an impact on both the conservation area and the Grade II listed NAAFI building and will result in harm at the lower end of the less than substantial scale.

Scheduled Ancient Monuments

- 7.83 Scheduled Ancient Monuments are located on and around the aerodrome, with the nearest being a Spigot Mortar Emplacement to the northeast of the application site and to the south of the Former Officers Mess. In addition, there are eleven World War II fighter pens located around the aerodrome. However, the proposed built form would be relatively distant from those heritage assets with substantial areas of woodland and other soft landscaping in the intervening space. As such, it is considered that the development would have no direct impact on the Scheduled Ancient Monuments themselves.

Summary of the Impact of the Proposal on Heritage Assets

- 7.84 It is considered that the proposal would clearly have an impact on the character and appearance of the conservation area and the character and setting of the Former Dining Room and Institute.
- 7.85 The application has been reviewed by the Senior Historic Buildings Officer at Surrey County Council who has provided detailed comments on the development proposed. His general comments (on the amended scheme for 80 units) are as follows:

“The scheme before us has all matters reserved except the fact it is for 80 houses and the access has been provided. The applicant and I have engaged in a lot of pre-application discussion to establish the significance of the site and identify those elements which are important for preserving and enhancing its significance. I am content that the applicant has in principle responded to many of the points I have raised.

Owing to the nature of the application, the applicant will still need to submit details for the appearance, access, landscaping, layout and scale of buildings on the site. As such, I have only taken into account here those matters which specifically relate to the access of the site and the number of dwellings. I have split my comments into the northern area (the area immediately to the north of the NAAFI building), the western area (the units to the west of Victor Beamish Road) and the southern area (the units to the south of the NAAFI building).

Northern Area

Aside from the Former Workshop (discussed below) there is very little left of this part of the site and as a result there is greater potential for change, provided this change fits in with the overall landscaping of the site. Being able to understand its relationship

with the airfield as well as the link with the southern and western areas are highly desirable elements. For the scheme to succeed it is vital that the northern area be understood as relating to and be accessible from the airfield itself and some of the buildings toward the north of the site should have principal elevations facing toward the airfield. These matters should be taken into account as part of the reserved matters.

The scheme will lead to the loss of the undesignated Former Workshop Building. A building recording condition to level 3 which will be needed to interpret the structure, provide drawings of its layout and elevations and photographs of the building as a whole as well as any specific features of note in line with paragraph 211 of the NPPF. In terms of the impact of its demolition, this should be considered harm to an undesignated heritage asset through its total demolition and harm to the conservation area from the loss of a building which makes a positive contribution to understanding its historic interest. It should be noted that even though the building makes a positive contribution to the conservation area, its loss should not be considered substantial harm because of its dilapidated state as I have set out above.

The heritage statement makes note of the fact the garden area to the north has the 'potential to accommodate commemorative features, artwork and /or sculpture, in response to the site's history and its contribution to World War II.' I would consider this to be a heritage benefit, but at present cannot find it on any of the drawings and am not convinced it would be enforceable should the applicant decide not to proceed with this element. ...

Western Area

The proposals for the western area of the site are well considered and have responded to concerns I raised about the alignment of buildings in this location. As can be seen in figures 1 and 2 the buildings mostly reflect the historic linear appearance of the buildings which faced directly on to Victor Beamish Avenue. I am little disappointed that two of the houses will not directly face Victor Beamish Avenue (18 and 19) but I consider this preferable to a previous scheme I saw for the site. I only wish to note here that the applicant has responded to my concerns. I will have to consider the design of these buildings as part of the reserved matters stage.

Southern Area

Historically, this was an open landscaped area with accommodation in three barrack blocks. As a result, the well landscaped space around these had an open communal use for troops to make use of while resting with footpaths connecting all of the area with the airfield to the north. The aerial photographs also show that one of the barrack blocks faced directly on to Victor Beamish Avenue to create a sense of place. Any building on Victor Beamish Avenue should have its principal elevation facing the highway owing to its status as a gateway for the wider airfield. There should also be good connectivity throughout the area with the rest of the airbase.

Since the previous scheme this element of the proposal has improved significantly. Key changes include the removal of units to provide more open space, better connectivity through the site and the re-orientation of units 3-10 so they face directly onto Victor Beamish Avenue. I am pleased to say that this has responded to the points I raised in my initial consultation response. I consider that the proposed residential units and improved interconnectivity of the site has the potential to enhance the conservation area, subject to reserved matters.

Overall Balance and Reserved Matters

As outlined above, there will be harm from the scheme from the loss of the Former Workshop Buildings. While the rest of the site will quite significantly change from its

current character and appearance, I am not of the opinion that this will necessarily equate to harm. This is because only elements of the character and appearance of the site reveal its historic or architectural interest. Ultimately, the applicant has given careful thought and consideration to those elements highlighted as being significant.

On balance, I consider that the arrangement of the buildings along Victor Beamish Avenue and the improved connectivity throughout the site will be an improvement. There will also be a benefit from the proposed new sculpture to the north of the site. Subject to the reserved matters being acceptable, I consider the scheme to result in an overall benefit to the conservation area.

7.86 In conclusion, the Historic Buildings Officer has stated:

I have assessed this application in line with paragraphs 201 and 205 of the NPPF. Subject to the reserved matters, I am of the opinion that the scheme overall will result in a benefit to the conservation area owing to the proposed commemorative feature, reinstatement of paths, better connectivity with the airfield and the arrangement of buildings along Victor Beamish Avenue. Such a benefit is modest and this will need to be taken into account with regard to other matters raised by consultees.

7.87 Whilst these comments are noted, it is considered that the lack of detail regarding some significant elements of the proposal, such as the nature of the commemorative feature(s), the nature of the reinstatement of paths, and how connectivity to the aerodrome will be facilitated, along with the absence of details of the design and materials of the proposed development, make it difficult to conclude that the proposal will not result in any harm to heritage assets.

7.88 The NPPF is clear that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations (paragraph 195).

7.89 Paragraph 205 goes on to confirm that: "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance." Paragraph 206 further states that: "Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

7.90 The application has been accompanied by a Statement of Significance and a Heritage Impact Assessment. The latter states that: "*Whilst we acknowledge that there would be some residual impact on the character and appearance of the Kenley Aerodrome Conservation Area stemming from the introduction of residential development and increased suburban density, owing to the loss of open green space and demolition of the former Workshops, we consider that this impact will be minimal given the limited interest of the former Workshops and can be appropriately mitigated through a comprehensive landscaping strategy, the restoration of historic vistas and the re-introduction of residential/ domestic uses in areas formerly occupied by similar uses and recording of the former Workshops prior to demolition.*" It is further stated that: *If the decision-maker considers that there is residual harm to the conservation area or listed building (which is not our judgment), then there are weighty public benefits*

through the delivery of housing and 40% affordable housing to weigh against this harm”.

- 7.91 Overall, it is considered that the development proposal would result in harm to the character and appearance of the conservation area and to the setting of the listed building. This harm would be considered to be ‘less than substantial’ and therefore the guidance provided in paragraph 208 is relevant which states that: *“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”*
- 7.92 As noted above, the applicants have indicated that they consider public benefits would result through the delivery of housing and 40% affordable housing.
- 7.93 Whilst it is acknowledged that the provision of 80 dwellings, including 40% affordable housing units, is a public benefit it is not considered that this benefit can currently be concluded to outweigh the potential harm to heritage assets that could result from the proposal. It is considered that insufficient information accompanies this Outline planning application to allow the local planning authority to conclude that the development would conserve or enhance the character and appearance of The Kenley Aerodrome Conservation Area and would not adversely impact the setting of the Grade II listed Former Dining Room and Institute building.
- 7.94 As such, it is concluded that the development would not accord with the requirements of Policy DP10 of the Tandridge Local Plan and the guidance contained within Section 16 of the National Planning Policy Framework

Archaeology

- 7.95 The application has been accompanied by an Archaeological Desk-Based Assessment. The Assessment considers there to be a low potential for Heritage Assets of archaeological significance due to the development and redevelopment of the site during and after the First and Second World Wars. It is agreed that the potential for archaeology predating the early 20th century is low for this reason, however, the above and below ground remains present within the site are all likely to date to the period of operation of this frontline airfield and therefore should be considered to be non-designated Heritage Assets of Local significance. The effects of the development on these assets needs to be considered as required under the National Planning Policy Framework (para 209).
- 7.96 The specialist advice received confirms that the Assessment indicates that archaeological remains of National Significance worthy of preservation *in situ* are unlikely to be present. As such, it is considered reasonable and proportionate to secure an archaeological evaluation, any subsequent archaeological mitigation measures and the provision of an information board by attaching the conditions to any permission that may be granted. On this basis, no objection is raised on archaeology grounds.

The Amenities of Nearby Occupiers.

- 7.97 Policy CSP18 of the Core Strategy advises that development must not significantly harm the amenities of the occupiers of neighbouring properties by reason of overlooking, overshadowing, visual intrusion, noise, traffic and any adverse effect. Criterion 6-9 of Policy DP7 of the Local Plan Part 2: Detailed Policies seek also to

safeguard amenity, including minimum privacy distances that will be applied to new development proposals.

- 7.98 The above policies reflect the guidance at Paragraph 135 of the NPPF, which seeks amongst other things to create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users of development.
- 7.99 The residential development would be situated closest to existing dwellings in Collard Close, Halton Road, Hillhurst Gardens and Rosebriars located to the west of the site, in Salmons Lane to the east and in Salmons Lane West to the south. The minimum separation distance between dwellings would be around 17 metres, but in most cases would be likely to exceed the minimum privacy distance of 22 metres specified in Policy DP7 of the Local Plan. Given that the detailed layout of the proposed development has not been specified it is considered that any issues relating to potential overlooking and loss of privacy could be addressed at the Reserved Matters stage, should permission be granted. On this basis, it is considered that the proposed residential development could be designed to have no impacts in terms of loss of light and privacy/overlooking. However, some degree of loss of outlook would be likely to occur from the rear gardens and rear elevations of some existing dwellings located close to the western boundary of the development site.
- 7.100 The occupation of 80 dwellings would also be likely to result in a much greater degree of activity at the site and within the immediate locality. In terms of vehicle movements, the submitted Traffic Impact Assessment (albeit based on a development of 87 units rather than the 80 now proposed) estimates that the development would generate 47 movements in the morning peak hour and 49 in the evening peak hour. All of these movements would have to utilise the existing junction at Victor Beamish Avenue and Salmons Lane West. However, whilst there would be additional traffic movements, in the context that the additional movements would feed onto Salmons Lane West which is already well used, the impact on the nearby residents arising from this would not be likely to be materially harmful.
- 7.101 The construction process would inevitably have a temporary impact on living conditions within nearby properties as a result of the proposed ground works, the movement of vehicles and the erection of the buildings. However, this would be temporary and controllable through the imposition of a condition relating to a Construction Environment Management Plan. As such, the impact of the construction process would not be a sound reason to object to the proposal.
- 7.102 For the reasons outlined, the proposal is considered acceptable in terms of the potential impact upon the residential amenities and privacy of existing properties and therefore no objection is raised in this regard against Policy DP7 of the Local Plan (2014) and Policy CSP18 of the Core Strategy (2008).

The Impact on Other Surrounding Land Uses.

- 7.103 The proposed development is unlikely to have any direct adverse impact on the school site which the development would surround, although there could potentially be some issues in terms of new residential units overlooking children's play areas or noise issues impacting on residential amenity as a result of children's play.
- 7.104 Concerns were raised by RAF Kenley that the proposal would result in a significant impact to aircraft approaching both the paved and grass runways at the aerodrome,

but this issue is considered to have been addressed through amendments to the proposed housing layout and height of development within the safeguarding zones.

- 7.105 The Chairman of Surrey Hills Gliding Club which operates from the aerodrome has raised concerns regarding traffic and parking on Victor Beamish Avenue. He indicates that access is required for glider trailers and other large vehicles, such as the winch being towed, the large HGV fuel lorries, City of London vehicles and grass cutting tractors with their large and wide towed cutters and if on-street parking in Victor Beamish Avenue occurs such access would be restricted, and this would adversely impact on the activities of the Gliding Club.

The Living Conditions of Future Residents.

- 7.106 Policy DP7 requires that development provide acceptable living conditions for occupiers of the new dwellings. The NPPF also states that development should create place “with a high standard of amenity for existing and future users.”
- 7.107 In terms of internal accommodation, the proposed dwellings would be required to satisfy the minimum dwelling sizes set out in the Government’s Technical housing standards - Nationally Described Space Standards 2015.
- 7.108 However, as the application has been submitted in Outline form, with no details of the layout or design of the dwellings, it is not possible to give consideration to the living conditions of future residents at this stage.

Traffic, Highway Safety, Access, Parking Provision and Other Related Facilities

- 7.109 Policy CSP12 states that the Council will require new development to make improvements, where appropriate, to the existing infrastructure network, including road and rail, facilities for bus users, pedestrians and cyclists and those with reduced mobility whilst also having regard to adopted highway design standards and vehicle and other parking standards. It also states that “the Council will support the enhancement and better management of the regional transport spokes”. The NPPF states that “Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”
- 7.110 The application has been reviewed by the Principal Transport Development Planning Officer at Surrey County Council who has commented as follows: The TA demonstrates that the Nineham Road arm of the above junction is expected to perform with an RFC value of 0.94 in the 2028 AM peak hour without the impacts of the proposed development, which would then further worsen performance at the junction. This represents operating at 94% of the maximum theoretical capacity of this arm of the junction, which is well above the generally recommended maximum preferable RFC of 0.85 (or 85%) to ensure that some resilience is retained.
- 7.111 The TA shows a worsening to an RFC value of 0.95 on this arm of the junction in the AM peak hour. While this only represents a worsening of 0.01 (or 1%), the fact that this arm is so close to maximum theoretical capacity makes any further worsening represent a potentially significant impact to the safe and effective operation of the public highway.
- 7.112 The above concern is worsened in the context of the additional mode share data presented within Table 5.2. While use of vehicle trip rates from TRICS is a generally acceptable method of forecasting trip generation for development proposals,

rationalisation using local data such as that provided by the Census can provide a better local insight into the actual likely levels of vehicle movements to be generated by the proposals.

7.113 The figures which the TA applies to modelling the impacts at local junctions are 45 and 48 trips in the AM and PM peak hours, respectively (calculated here by combining the trip numbers detailed in Table 6.1). Using the mode split data provided in Table 5.2, however, the likely car trip generation alone would be 64 and 54 trips in the AM and PM peak hours, respectively. This is based on applying the Census mode share data to the total person trips forecasted by TRICS.

7.114 Given that trips made by rail would most likely start with a car trip to the railway station, as explained above, there is a strong argument that the rail mode share should be added to the expected car trip generation, which would then result in a total of 79 and 66 vehicle movements in the AM and PM peak hours, respectively. The table overleaf summarises the different total site trip generation figures which can be reached on this basis:

Time Period	Applied to modelling	Based on share data (car only)	Based on mode share data (car plus rail)
AM peak hour	45 vehicle movements	65 vehicle movements	79 vehicle movements
PM peak hour	48 vehicle movements	54 vehicle movements	66 vehicle movements

7.115 On the basis of the above, it is considered that the actual potential impacts of the proposed development on highway capacity may in fact be worse than suggested by the modelling data provided. It is however recognised that the trips to rail are not likely to route through the Salmons Lane West, Buxton Lane and Ninehams Road roundabout junction.

7.116 As a result the Local Highway Authority object to the proposal on the grounds of the impact of the development on the performance of the public highway.

7.117 The applicants have confirmed that they would agree to provide a formalised pedestrian crossing point on the local highway network, but no specific details have been provided at this stage.

7.118 As such, it is considered that the proposed development would conflict with the requirements of Core Strategy Policy CSP12 in respect of traffic generation and impact on the functioning of the local highway network.

Highway Safety

7.119 Policy CSP12 of the Core Strategy also advises that new development proposals should have regard to adopted highway design standards and vehicle/other parking standards. Criterion 3 of Policy DP7 of the Local Plan also requires new development

to have regard to adopted parking standards and Policy DP5 seeks to ensure that development does not impact highway safety.

7.120 The applicant has indicated that the development would have parking provision to accord with the Car Parking Standards in terms of both cars and cycles. A 5.5m wide access would be provided which would be suitable for a large refuse collection vehicle.

7.121 As such, it is not considered that the proposal would conflict with relevant development plan policy requirements in respect of parking provision and highway safety within the site.

Trees and Tree Protection

7.122 Core Strategy Policy CSP 18 (Character and Design) requires that:

Development must also have regard to the topography of the site, important trees or groups of trees and other important features that need to be retained.

7.123 Paragraph 13 of Policy DP7 of the Local Plan states:

Where trees are present on a proposed development site, a landscaping scheme should be submitted alongside the planning application which makes provision for the retention of existing trees that are important by virtue of their significance within the local landscape. Their significance may be as a result of their size, form and maturity, or because they are rare or unusual. Younger trees that have the potential to add significant value to the landscape character in the future should also be retained where possible. Their retention should be reflected in the proposed development layout, allowing sufficient space for new and young trees to grow to maturity, both above and below ground. Where existing trees are felled prior to permission for development being sought, the Council may require replacement planting as part of any permission granted.

7.124 Further guidance on the consideration of trees in relation to development is provided within the Tandridge Trees and Soft Landscaping SPD (2017).

7.125 The application site is located within the Kenley Airfield Conservation Area so all trees above a certain size are protected and in addition the site is almost entirely encompassed by Tree Preservation Order No. 2, 1999, which is an 'area' order covering all the trees that were present on 16th April 1999 when the order was made.

7.126 The submitted information indicates that the site currently accommodates some 270 trees, and the Arboricultural Impact Assessment shows 50 individual trees and tree groups/partial groups to be removed to facilitate development. However, the Proposed Site Layout – Tree Removal Plan (Drg No. P110) establishes that the actual quantity of trees to be removed as being 132, out of 270 – around 49% of the total tree cover.

7.127 The Council's Principal Tree Officer has provided the following advice:

"... it must also be acknowledged that the large number of lower quality tree losses, will cumulatively have a very negative impact on the landscape and the character of the conservation area. It will no doubt be a consideration within the planning balance as to whether this impact is acceptable in the context of the development as a whole.

In terms of the provision for soft landscaping I am reasonably satisfied that sufficient space has been provided for new planting. However, not to a degree that would in any way make up for the huge tree losses, particularly as there is unlikely to be a great deal of space to accommodate larger species trees. I would suggest that in any detailed application further provision is made for large species tree planting, with adequate space to mature both above and below ground. Planting on frontages will also be important, in pursuance of paragraph 131 of the NPPF which requires all new streets to be tree lined unless there are clear, justifiable and compelling reasons why this would be inappropriate.

Conclusions & Recommendations

With all the above in mind I am of the view that in its current form the application fails to recognise the constraints imposed by the most important existing trees, which are important by virtue of their significance within the local landscape, contrary to Policy DP7 of the Tandridge Local Plan Part 2: Detailed Policies 2014, Policy CSP18 of the Tandridge District Core Strategy 2008, and Key Consideration 2 and 4 of the Tandridge District Trees and Soft Landscaping Supplementary Planning Document.

I am very glad to see that T87 and G123 have now been retained in the indicative layout, and as such I have no specific objections in terms of the principle of development against the loss of important individual trees, considering the outline nature of the application with all matters reserved save for access. However, I do remain concerned with regards to the volume of tree losses overall, and consideration should therefore be given to my comments ... above regarding scope for tree planting, and whether on a broader scale the character of the conservation area will be negatively affected.”

- 7.128 The specialist advice is considered to be sound, and there is no known reason to reach a different conclusion. The development is therefore considered to have an unacceptable impact on protected trees and woodland and thus the development would conflict with Policies CSP18 and DP7. Whilst it is acknowledged that the most important trees on the site are now shown to be retained it is the sheer scale of tree and woodland removal proposed that is considered to be objectionable and this would also have a serious negative impact on the character and appearance of the Kenley Aerodrome Conservation Area.

Ecology, Biodiversity and Habitats.

- 7.129 The NPPF states that planning decisions should contribute to and enhance the natural environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.
- 7.130 Policy CSP17 of the Core Strategy requires development proposals to protect biodiversity and provide for the maintenance, enhancement, restoration and, if possible, expansion of biodiversity, by aiming to restore or create suitable semi-natural habitats and ecological networks to sustain wildlife in accordance with the aims of the Surrey Biodiversity Action Plan.
- 7.131 Policy DP19 of the Local Plan Part 2: Detailed Policies 2014 advises that planning permission for development directly or indirectly affecting protected or Priority species will only be permitted where it can be demonstrated that the species involved will not be harmed or appropriate mitigation measures can be put in place. The sites is within a designated Biodiversity Opportunity Area which are regionally identified priority areas

of opportunity for restoration and creation of Priority Habitats and should be considered as areas of opportunity, not a constraint.

- 7.132 The application has been accompanied by a Biodiversity Check List and an Ecology Assessment. The submitted Assessment details the habitat surveys that were carried out in June 2021 and May 2023 in order to ascertain the general ecological value of the site and to identify the main habitats and associated plant species. It is indicated that the proposals will retain the eastern area of woodland and a large number of scattered trees, and that new tree and hedgerow planting, creation of wildflower meadow and areas of landscape planting within the development proposals will provide continued foraging and navigational opportunities for bats as well as providing nesting opportunities for birds.
- 7.133 The Ecology Assessment concludes that, with the implementation of the safeguards and recommendations set out within this report, it is considered that the proposals accord with planning policy with regard to nature conservation at all administrative levels.
- 7.134 The application has been reviewed by Natural England and the Surrey Wildlife Trust. Natural England have raised no objection to the proposal. Surrey Wildlife Trust have provided detailed comments highlighting that further ecological information would be required prior to determination of the application. The issues identified include further information regarding the potential impact of tree removal on bat habitats, the requirement for a sensitive lighting management plan, further survey work relating to the potential presence of hazel dormouse and reptiles, the requirement for an invasive species management plan, the requirement for a further assessment of the impact of the proposal on statutory and non-statutory sites, the need to assess whether any areas of lowland mixed deciduous woodland Habitat of Principal Importance are present on the site, the provision of greater detail on the classification of any grassland habitats to be lost and an assessment of what Biodiversity Net Gain could be delivered on the back of the development proposal.
- 7.135 The submitted information does not currently allow the Council to conclude that there will be no adverse impacts on the South London Downs NNR and on Coulsdon Court Wood & Betts Mead and Kenley Aerodrome Sites of Borough Importance or on protected species, including reptiles, bats and dormouse or on protected flora. Therefore, given the lack of detailed information regarding the potential impact of the development on ecology and biodiversity and any potential Biodiversity Net Gain that could mitigate the loss of any existing habitat it has not proved possible to confirm that the proposal would accord with the requirements of Policy CSP17 of the Core Strategy and Policy DP19 of the Tandridge Local Plan.

Flood Risk and Surface Water Drainage

- 7.136 Policy DP21 of the Tandridge District Local Plan Part 2: Detailed Policies 2014 advises that proposals should seek to secure opportunities to reduce both the cause and impact of flooding. Development proposals within Flood Risk Zones 2 and 3 or on sites of 1 hectare or greater in Zone 1 will only be permitted where, inter alia, the sequential test and, where appropriate, exception tests of the NPPF have been applied and passed and that it is demonstrated through a Flood Risk Assessment (FRA) that the proposal would, where practicable, reduce flood risk both to and from the development or at least be risk neutral.

- 7.137 The impact of climate change on the global environment is recognised and flooding from surface water runoff is one of the main consequences. The planning system is expected to play a critical role in combating the effects of climate change by pursuing sustainable development and use of Sustainable Urban Drainage Systems (SuDS).
- 7.138 In terms of flood risk, the site is located within Flood Zone 1. The east of the site is noted from the Strategic Flood Risk Assessment as being at risk from groundwater flooding for subsurface structures and there are areas of low to medium risk of surface water flooding.
- 7.139 The application has been accompanied by a Flood Risk Assessment and a Sustainable Drainage System statement. These documents have been reviewed by the Environment Agency, the Lead Local Flood Authority (Surrey County Council) and Thames Water and no objections have been raised to the amended proposals, subject to the imposition of appropriate conditions on any permission granted.
- 7.140 Whilst comments from The Caterham Flood Action Group (FLAG) that, despite the fact that the applicant has confirmed that the sewer connection from the proposed development would not be discharging into the storm sensitive sewers of Caterham on the Hill and Old Coulsdon but instead would connect to Thames Water sewers on Salmons Lane and Whyteleafe Hill, they remain concerned about the additional foul flow down a steep road that becomes a river during rainfall and that, in addition to foul/fluvial flooding, Whyteleafe suffers from ground water flooding, when the Bourne rises to the surface (historically every seven years) are noted, it is considered appropriate to be guided by the specialist advice that has been received. On this basis, it is considered that were planning permission to be granted conditions can be imposed to address the statutory and development plan requirements with respect to surface water drainage. Therefore, no objection is raised to the proposal on flooding grounds and no conflict with the requirements of Policy DP21 of the Tandridge Local Plan has been identified.

Contaminated Land

- 7.141 Policy DP22 states that proposals for development on land that is or may be contaminated will be permitted provided that there will be no unacceptable risk to health or the environment and provided adequate remedial measures are proposed which would mitigate the effect of any contamination and render the site suitable for use. Where there is evidence of a high risk from residual contamination the applicant will be required to show as part of the application how decontamination will be undertaken. Contamination is also addressed within Core Strategy Policy CSP15.
- 7.142 The applicant's submissions have included a Desk Study, Geotechnical and Geoenvironmental Interpretive Report (Produced by CGL Ref: CG/39415). The Council's Specialist Advisor with respect to contaminated land has reviewed this submission and indicates that the level of potential contamination could be quite high but considers this would not be a barrier to development, subject to the imposition of appropriate conditions should planning permission be granted.
- 7.143 The document has also been reviewed by the Environment Agency and they have commented as follows: "We have reviewed the ... Report .. and note that contamination has been identified on site in the form of elevated PAHs and TPH's, however it is noted that no testing has been conducted to assess the potential presence for PFAS. PFAS is a potential contaminant of concern on the site, given the sites history and association with the adjacent Aerodrome. It is also appears that the complete report has not been submitted as part of this application and as such a complete assessment of the report

cannot be made.” However, they conclude that subject to the imposition of appropriate conditions relating to the submission of a strategy for dealing with contamination risks, surface water drainage, foul drainage, piling and the disposal of soil, they would not object to the proposal.

- 7.144 It is considered appropriate to be guided by the specialist advice that has been received and there is no known reason to conclude that the advice provided is not sound. On this basis, it is considered that conditions can be imposed to address the statutory and development plan requirements with respect to contaminated land and pollution protection. Therefore, subject to those conditions, it is considered that the proposal should be found to be acceptable and in accordance with the abovementioned policies.
- 7.145 The issue of unexploded ordnance has also been raised, given that the site was heavily bombed during the Second World War, but again it is considered that this matter could be appropriately addressed by way of planning conditions should planning permission be granted.

Other Material Considerations.

Renewable Energy

- 7.146 Policy CSP14 requires the reduction of carbon dioxide (CO₂) emissions by means of on-site renewable energy technology, with a development of 10 or more dwellings achieving a 20% reduction of carbon dioxide emissions through the provision of renewable energy technologies. In this regard the applicant has submitted an Energy and Sustainability Statement, prepared by Ecolytik, which sets out that the Energy Hierarchy for the proposed development. This prioritises a fabric first approach, followed by supplying energy efficiently and subsequently the application of low and zero carbon technologies onsite. Through the measures outlined for each stage of the Energy Hierarchy, it is anticipated the proposed development can achieve over 50% reduction in regulated CO₂ emissions over the Part L 2021 baseline. This is a preliminary estimation of the outline scheme, and it is indicated that a detailed assessment would be carried out in reserved matters stage.
- 7.147 It is also indicated that the proposed sustainability strategy involves integrating a variety of sustainability measures into the scheme with the aspiration of meeting and exceeding policy requirements. Air source heat pumps with no onsite emissions are proposed for all homes to maintain good air quality across site, and that other measures would include water efficiency fittings, a holistic SuDS strategy, landscape and ecology enhancements, and prioritising the use of construction materials with high recycled content.
- 7.148 These intentions are noted and, subject to an appropriate condition, it is considered that the development would accord with the abovementioned policy requirement.

Open Space and Play Space

- 7.149 Policy CSP13 states that new or improved facilities to meet the needs of all sections of the community will be encouraged and that the Council will apply the standard of 1.27 ha per 1000 population to the provision of playing space for all ages.
- 7.150 The applicant has indicated that: “A variety of publicly open spaces feature within the proposed landscape which provide opportunities for play and seating. Publicly open

space will cover 0.88ha of the 4.74ha site. A series of playable trails and informal play spaces are incorporated throughout the landscape as shown on the site masterplan submitted within the Landscape Design and Access Statement. Details of the play equipment will be confirmed at reserved matters stage. All dwellings will come with a sizeable back garden for private enjoyment. The layout of the scheme has been designed with well-landscaped streets and public areas. Full details can be found in the Landscape Design and Access Statement.”

7.151 This provision is considered to be adequate to meet the policy requirements.

Loss of Existing Playing Field

7.152 The application site does include a grass playing field, which is located to the south of the former NAAFI building (now in use as a school) which can be seen in recent aerial photographs (2022) to be marked out to provide a football pitch with 2no. smaller football pitches overlaid across it. There is also the presence of a rounders pitch as well as a training grid to the north.

7.153 The applicants’ dispute that the area is a ‘playing field’ and suggest that the area was until 1999 owned by the Ministry of Defence until it was sold to Cala Homes. In 2003 the site was acquired by the applicants. They indicate that the land in question has been “used informally as a ‘kick-about’ area for the school children of One School Global and not as their formal sports ground. They further state that: “it remains fact that One School Global (located immediately to the north of the site in the former Royal Air Force NAAFI building) was the only former and occasional user of the southern part of the proposed residential site described by Sport England as a delineated pitch, and only in fine weather”, that “This use was granted by the landowner as a gesture of neighbourly goodwill whilst the site was being assessed by the Local Planning Authority and latterly an Inspector as a residential allocation in the draft Local Plan” and that “The site has never been suitable for formal or all weather use as a playing pitch as it is poor quality grassland laid over rubble and the foundations of military buildings.”

7.154 Sport England have been consulted on the application and have raised a statutory objection as they consider that: “The proposal will result in the loss of the existing playing field at the site. Sport England notes that the playing field has been marked out and used for football and rounders. The pitch does not conform to FA recommended size guidelines and measures 66m x 41m. Given the constraints of the playing field site, Sport England considers that only a 7 x 7 FA recommended sized pitch can be accommodated (61m x 43m inc 3m run/off) in this area.”

7.155 They further state that: “We have consulted the Football Foundation/FA on the application, and we have received the following comments. The FF comments that the Playing Pitch Strategy (PPS) for Tandridge from 2018 states that based on demand at the time, there was relatively minimal capacity existing on youth and mini pitches. However, with the increased participation numbers in the last couple of years within the area is likely to have had an impact on the demand and capacity of the pitches. The PPS is now considered out of date. Therefore, with no update PPS there is no current evidence for the loss of grass pitches. The plans show the loss of a grass pitch therefore we would expect mitigation for this via replacement of the grass pitch provision to equal or better scale and quality, or contribution into alternative appropriate facilities to mitigate the loss (i.e. 3G pitch provision) within the area” and they also note that there is no proposal to replace the playing field as part of the application.

7.156 Sport England therefore consider that the proposal would conflict with the requirements of paragraph 103 of the NPPF which states that:

“Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.”

7.157 Sport England have also confirmed that they do not consider that the argument that the playing field is of a poor quality is significant as they consider the facility could be upgraded if required and the quality of the current pitch would not be a reason to allow the loss of the facility.

Presumption in Favour of Sustainable Development

8.1 The NPPF (December 2023, paragraph 11) states that a presumption in favour of sustainable development should be applied. Paragraph 11 of the NPPF (2023) further states that for decision making, this means that ‘where there are no relevant development plan policies, or the policies which are the most important for determining the application are out-of-date, granting permission’ (also known as the ‘tilted balance’) unless:

- the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies of the NPPF taken as a whole.

8.2 Footnote 7 confirms that the policies referred to are those in the Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 187 of the Framework) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 72); and areas at risk of flooding or coastal change.

8.3 The Council is currently unable to demonstrate a 5-YHLS and the delivery of housing has been below 75% of the housing requirement for the past three years. Therefore, for residential applications the ‘tilted balance’ needs to be applied within the District.

8.4 However, as specified by NPPF paragraph 11d(ii), the tilted balance does not apply to this application because the adverse impacts significantly and demonstrably outweigh the benefits. As identified in the report, the development is considered to result in inappropriate development in the Green Belt where the very special circumstances (VSC) put forward to be considered do not demonstrably outweigh the benefits (listed within the VSC section of this report).

Conclusion

9.1 The assessment of the proposals against the Green Belt purposes concludes that there are clear conflicts. Given the character of the application site, it is considered

that the development would result in spatial and visual impact on the openness of the Green Belt. The proposal would also conflict with at least two out of the five purposes of including land in the Green Belt.

- 9.2 The harm to the Green Belt is considered to be substantial and this harm should be afforded very substantial weight. As a result, it is necessary to establish whether there are any 'very special circumstances'. The NPPF states at paragraph 153 that VSC will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any 'other harm' resulting from the proposal, is clearly outweighed by other considerations.
- 9.3 The 'Overall summary of VSC and Planning Balance' has set out all of the harms on one side and all of the benefits and other material considerations on the other side of the balance and officers have concluded that all of the harms are not clearly outweighed by all of the benefits. 'very special circumstances' do not exist in this case.
- 9.4 It is considered that the application of policies in the National Planning Policy Framework provides a "clear reason for refusing" the development proposal under NPPF paragraph 11(d)(i). It is concluded that the proposals are in conflict with the Development Plan Policies in so far as they relate to the Green Belt, built environment, and character and appearance of the site, area and landscape. There are no other material considerations that have a bearing on the planning balance. As a result of the nature and quantum of these concerns it is recommended that outline planning permission is refused for the reasons set out at the end of this report.
- 9.5 The recommendation is made in light of the National Planning Policy Framework (NPPF) and the Government's Planning Practice Guidance (PPG). It is considered that in respect of the assessment of this application significant weight has been given to policies within the Council's Core Strategy 2008 and the Tandridge Local Plan: Part 2 – Detailed Policies 2014 in accordance with the NPPF 2023. Due regard as a material consideration has been given to the NPPF and PPG in reaching this recommendation.
- 9.6 All other material considerations, including third party comments, have been considered but none are considered sufficient to change the recommendation.

RECOMMENDATION:

REFUSE

Reasons for Refusal:

1. The proposal would result in the loss of a playing field, which would not be replaced as part of the proposal and would therefore conflict with Policy CSP13 of the Policy DP 18 of the Tandridge District Core Strategy 2008, Tandridge Local Plan - Part 2: Detailed Policies 2014, Sport England's Playing Fields Policy and Guidance Document and with Paragraph 103 of the National Planning Policy Framework (December 2023).
2. The proposed development is considered to be inappropriate development in the Green Belt, given that it would fail to comply with any of the defined exceptions at paragraphs 154 and 155 of the National Planning Policy Framework (December 2023). The cumulative benefits of the scheme which have been presented as Very Special Circumstances (VSCs) are insufficient to outweigh the substantial harm to the Green Belt, by virtue of inappropriateness and due to the harm to openness that would arise, in addition to the significant harm to the character and appearance of the site, area and landscape. Accordingly, the proposed development is considered to be contrary

to Policies DP10 and DP13 of the Tandridge Local Plan 2014 Part 2: Detailed Policies and the NPPF (December 2023) .

3. The site is located in an unsustainable location in transport terms, where the only realistic means of transport would be the private car, due to the distance to local amenities, the lack of suitable pedestrian and cycle connections to those amenities, and the limited availability of accessible public transport services. This is contrary to the aims of the NPPF (December 2023) and the Surrey Local Transport Plan 4 (2022) and the Tandridge Local Plan (2008 and 2014). Policy CSP1 Tandridge Local Plan (2008), Policies DP1
4. The proposals would result in an unacceptable impact to highway capacity, in particular at the roundabout junction of Salmons Lane West, Buxton Lane and Ninehams Road, contrary the aims of the NPPF (December 2023) and the Surrey Local Transport Plan 4 (2022) and the Tandridge Local Plan (2008 and 2014). to Policy DP5 of the Tandridge Local Plan - Part 2: Detailed Policies 2014
5. The proposed development would result in the felling of a significant number of protected trees subject to Tree Preservation Order protection or protected due to their location within the Kenley Aerodrome Conservation Area. The indicative layout details provided would not allow for the retention of existing trees that are important by virtue of their significance within the local landscape and would not appear to allow sufficient space for appropriate replacement planting and as such the proposal would conflict with the requirements of Policy CSP 21 of the Tandridge District Core Strategy 2008, Policy DP7 of the Tandridge Local Plan - Part 2: Detailed Policies 2014 and paragraph 180 of the National Planning Policy Framework (December 2023).
6. Insufficient information has been provided to allow a full assessment of the potential harm of the proposed development on designated and non-designated heritage assets, including the Kenley Aerodrome Conservation Area within which the application site is located and the Grade II listed former Dining Room and Institute building which the application site surrounds. Proposed 'mitigation' measures have not been detailed and it has not been demonstrated that the public benefits of the proposal would significantly outweigh the less than substantial harm that would result to the character and appearance of the conservation area, the impact on the character and setting of the listed building and through the loss of the non-designated former workshop buildings as a result of the development. As such, the proposal would conflict with Policy DP20 of the Tandridge Local Plan - Part 2: Detailed Policies 2014 and paragraphs 205, 206, 208 and 209 of the National Planning Policy Framework (December 2023).
7. Insufficient information has been provided to demonstrate that the proposed development would conserve and enhance the natural environment and deliver an appropriate level of biodiversity net gain. As a result, the proposal would conflict with the requirements of Policy CSP17 of the Tandridge District Core Strategy 2008, Policy DP19 of the Tandridge Local Plan - Part 2: Detailed Policies 2014 and the National Planning Policy Framework (December 2023).

Informatives:

1. This decision relates to drawings and documents numbered 21125/C04B, C05, C06A, C07A, C08A, C09A, C10A, C100, C104C, P101, P110, 21174-3, 21174-4, 2193-00-GF-DR-L-00100 and 00101.

	Signed	Dated
Case Officer	PL	15.04.2024
Checked ENF		
Final Check	FN	13.05.2024

APPENDIX 10 – LIST OF DOCUMENTS AND PLANS SUBMITTED AND FOR APPROVAL

Appendix 10 – Appeal Plans and Documents

The plans and documents listed below are those which supported the planning application and the final column list those plans and documents which are now subject to approval under this appeal.

Original Submission	Submitted During Application	Submitted under Appeal These plans were submitted within the DAS Rev A and are now submitted as freestanding plans for the Inspector's benefit.	For Determination
Parameter Plans			
21125/CO4B – Urban Grain and Density Plan		21125/CO4C – Urban Grain and Density Plan	21125/CO4C – Urban Grain and Density Plan
21125/CO5 – Access and Movement Diagram	DAS Rev A, Page 45	21125/CO5C – Access and Movement Diagram	21125/CO5C – Access and Movement Diagram
21125/CO6A – Building Heights Diagram	DAS Rev A, Page 42	21125/CO6B – Building Heights Diagram	21125/CO6B – Building Heights Diagram
21125/CO7A – Illustrative Residential Mix Diagram	DAS Rev A, Page 43	21125/CO7B – Illustrative Residential Mix Diagram	21125/CO7B – Illustrative Residential Mix Diagram
21125/CO8A – Tenure Mix Diagram	DAS Rev A, Page 44	21125/CO8B – Tenure Mix Diagram	21125/CO8B – Tenure Mix Diagram
21125/CO9A – Parking Distribution Diagram	DAS Rev A, Page 46	21125/CO9B – Parking Plan	21125/CO9B – Parking Plan
21125/C10A – Land Use Diagram	DAS Rev A, Page 47	21125/C10B – Land Use Diagram	21125/C10B – Land Use Diagram
21125/C100 – Site Location Plan			21125/C100 – Site Location Plan
21125/P101 – Existing Site Plan			21125/P101 – Existing Site Plan
21125/C104 – Colour Site Layout	21125/C104C – Colour Site Layout		21125/C104C – Colour Site Layout
21125/P110 – Proposed Site Layout – Tree Removal	DAS Rev A, Page 38	21125/P110A – Proposed Site Layout – Tree Removal	21125/P110A – Proposed Site Layout – Tree Removal
	21125/SK15 – MOD Height Restriction	21125/SK15A – MOD Height Restriction	21125/SK15A – MOD Height Restriction
Landscaping Plans			
2193-00-GF-DR-L-00100			2193-00-GF-DR-L-00100
2193-00-GF-DR-L-00101			2193-00-GF-DR-L-00101
Documents			
Design and Access Statement (ref. 21125) (July 2023, OSP)	Design and Access Statement (ref. 21125 Rev A) (January 2024, OSP)		Design and Access Statement (ref. 21125 Rev A) (January 2024, OSP)

(Part 1-7)	(Part 1-8)		(Part 1-8)
Landscape Design and Access Statement (June 2023, Scarp) (Part 1-5)			Landscape Design and Access Statement (June 2023, Scarp) (Part 1-5)
Landscape and Visual Impact Assessment (June 2023, Scarp)			Landscape and Visual Impact Assessment (June 2023, Scarp)
Tree Protection Plan (ref. 21174-3) (June 2023, Barrell Tree Consultancy)	Tree Protection Plan (ref. 21174-4) (January 2024, Barrell Tree Consultancy)		Tree Protection Plan (ref. 21174-4) (January 2024, Barrell Tree Consultancy)
Arboricultural Impact Assessment and Method Statement (ref. 21174-AIA-CA) (June 2023, Barrell Tree Consultancy)	Arboricultural Impact Assessment and Method Statement (ref. 21174-AIA2-CA) (January 2024, Barrell Tree Consultancy)		Arboricultural Impact Assessment and Method Statement (ref. 21174-AIA2-CA) (January 2024, Barrell Tree Consultancy)
Manual for Managing Trees on Development Sites (Barrell Tree Consultancy)			Manual for Managing Trees on Development Sites (Barrell Tree Consultancy)
Application Form (and redacted version)			Application Form (and redacted version)
Community Infrastructure Form 1 (July 2023, Daniel Watney LLP)			Community Infrastructure Form 1 (July 2023, Daniel Watney LLP)
Ecology Assessment (ref. 9952.EcoAss.vf2) (June 2023, Ecology Solutions)			Ecology Assessment (ref. 9952.EcoAss.vf2) (June 2023, Ecology Solutions)
Biodiversity Checklist (June 2023, Ecology Solutions)			Biodiversity Checklist (June 2023, Ecology Solutions)
Energy and Sustainability Statement (June 2023, Ecolytik)			Energy and Sustainability Statement (June 2023, Ecolytik)
Flood Risk Assessment (June 2023, Elliot Wood)			Flood Risk Assessment (June 2023, Elliot Wood)
SuDS Strategy (June 2023, Elliot Wood) (Part 1-4)			SuDS Strategy (June 2023, Elliot Wood) (Part 1-4)
Utility Statement (June 2023, Elliot Wood) (Part 1-2)			Utility Statement (June 2023, Elliot Wood) (Part 1-2)

Desk Study, Geotechnical and Geoenvironmental Interpretative Report (June 2023, Card Geotechnics Limited) (Part 1-8)			Desk Study, Geotechnical and Geoenvironmental Interpretative Report (June 2023, Card Geotechnics Limited) (Part 1-8)
Heritage Statement (June 2023, Montagu Evans)			Heritage Statement (June 2023, Montagu Evans)
	Heritage Statement Addendum (January 2024, Montagu Evans)		Heritage Statement Addendum (January 2024, Montagu Evans)
Statement of Significance (December 2021, Montagu Evans)			Statement of Significance (December 2021, Montagu Evans)
Planning Statement (July 2023, Daniel Watney LLP)			Planning Statement (July 2023, Daniel Watney LLP)
Statement of Community Involvement (May 2023, Cratus)			Statement of Community Involvement (May 2023, Cratus)
Transport Assessment (June 2023, Motion) (Part 1-3)			Transport Assessment (June 2023, Motion) (Part 1-3)
Travel Plan (June 2023, Motion)			Travel Plan (June 2023, Motion)
	Archaeology Report (November 2023, AJA)		Archaeology Report (November 2023, AJA)

APPENDIX 11 – RESPONSE TO CONSULTEES AND THIRD PARTIES

Appendix 11 – Response to Consultation Responses

STATUTORY AND NON-STATUTORY CONSULTEE RESPONSES

Consultee Response	Appellant Response
NATS Safeguarding – No safeguarding objection to the proposal.	
Surrey Hills AONB Planning Adviser – no objection	
Surrey Police – no objection but offers comments on the design of the scheme and a recommended condition	The scheme was submitted in outline with all matters except for access submitted in detail. The reserved matters applications and subsequent conditions will pick up matters relating to lighting design and further details within the design of the scheme to ensure the scheme designs out crime as far as reasonably possible.
Surrey Fire & Rescue Service – no objection	
Surrey County Council – Archaeology – No objection subject to conditions	
Gatwick Airport – No objection	
Surrey County Council – Historic Buildings Officer – Attached at Appendix 6	Please refer to the Statement of Case which discusses the appellant’s response to the initial comments and provides comment on the latest comments received.
Surrey County Council – Early Years Commissioning – no objection and offers comments	
Environment Agency – no objection, subject to conditions.	
Lead Local Flood Authority – no objection, subject to conditions	
Contaminated Land Officer – TDC – no objection subject to conditions	
National Highways – No objection	
Environmental Health – TDC – no objection subject to conditions	
Natural England – No objection	
Caterham on the Hill Parish – Objection relating to the submission of the application in outline, overall suitability of the site not being established, inappropriate development in the Green Belt and questions what the VSC are,	It is not uncommon to for planning applications to be made in outline that affect heritage assets. Green Belt and other designations. The Council retains control regarding relevant matters such as layout, landscaping and design.

questions archaeology report conclusions.	An archaeology report was submitted with the application and the Council obtained specialist advice. No objection is raised by the Council on archaeological grounds and appropriate conditions can be attached to secure further details. A response to matters relating to Green Belt and VSC are captured in the Statement of Case in relation to the appellant's case for reason for refusal 1.
Defence Infrastructure Organisation – no objection subject to conditions	
Surrey County Council – Highways – Recommend refusal on the grounds that the development is unsustainable in transport terms and due to its impact on the public highway	Please refer to the appellant's Statement of Case relating to reasons for refusal 3 and 4..
Whyteleafe Village Council – objection. Concern with sewer capacity, refers to the Caterham Flood Action Group commentary with regard to drainage and surface water management. Additional traffic and parking, construction traffic.	
Sport England – objection on the grounds that the scheme is not considered to accord with any exceptions to Sport England's Playing Fields Policy	Please refer to the appellant's Statement of Case relating to reason for refusal 1.
Thames Water – no objection	
Historic England – do not wish to comment	
Surrey Wildlife Trust – Requests further clarification on various ecological matters including roosting bats, hazel dormouse, reptiles, impact on nearby statutory and non-statutory sites, detailed assessment of on-site woodland and BNG assessment. The comments also provide pre-commencement conditions and general recommendations regarding construction, breeding bird season and biodiversity enhancements.	Please refer to the appellant's Statement of Case relating to reason for refusal 7.
London Borough of Croydon – no objection	

THIRD PARTY COMMENTS

41 of the 42 comments received objected to the appeal scheme. These objections are summarised and responded to below.

Third party comments	Appellant response
Harmful impact on highway safety	Please refer to the appellant's Statement of Case relating to reasons for refusal 3 and 4.
Speeding traffic is already experienced and would exacerbate the risks.	Please refer to the appellant's Statement of Case relating to reasons for refusal 3 and 4.
Traffic calming measures should be provided	Please refer to the appellant's Statement of Case relating to reasons for refusal 3 and 4.
The poor condition of the roads within the locality would be worsened.	The scheme is submitted in outline which subject to approval would require reserved matters to approved before the scheme can be commenced. At this point, the scheme would be liable to pay CIL contributions to the Council to support local infrastructure. The Council determines how this money is allocated.
Increased pollution and more specifically pollution from traffic. Loss of trees at the site would remove mitigation of air pollution.	No objection was raised by the Environment Agency.
Would cause increased pressure on services which has inadequate school places, doctor services and dentist facilities	The scheme is submitted in outline which subject to approval would require reserved matters to approved before the scheme can be commenced. At this point, the scheme would be liable to pay CIL contributions to the Council to support local infrastructure. The Council determines how this money is allocated.
Light pollution	A lighting scheme would be submitted once the design of the outline scheme had progressed and would be approved by the Local Planning Authority at reserved matters stage or via conditions before being implemented.
Development in the Green Belt with the Very Special Circumstances requirement not being met	Please refer to the appellant's Statement of Case relating to reason for refusal 2.
Proposal would represent overdevelopment of the site	The scheme represents a well-designed space making the best use of land whilst ensuring a high-quality environment through the site for existing and future residents of the site and the surrounding area.
The site is a memorial ground and shouldn't be developed on. Adverse impact on the character and setting of the listed building and on the conservation area	The site is not and never has been consecrated and has no status as a memorial. The scheme will enhance the historic significance of the site, designated heritage assets and celebrate its heritage.
Development would be out of keeping with surrounding development. Adverse visual impact.	The scheme conforms with the style of residential development in the surrounding area and is set amongst well established vegetation, set back from any major roads. SCC's Senior Historic Buildings Officer has no objection to the outline scheme.

Loss of green space would be detrimental to the character of the area	Please refer to the appellant's Statement of Case relating to reason for refusal 2 and 6.
Traffic generation would increase congestion	Please refer to the appellant's Statement of Case relating to reasons for refusal 3 and 4.
Adverse impact on ecology	Please refer to the appellant's Statement of Case relating to reason for refusal 7.
Location is unsustainable in accessibility terms with residents having to rely on private cars to access services due to poor public transport links and the topography of the area	Please refer to the appellant's Statement of Case relating to reasons for refusal 3 and 4.
Flooding issues and lack of sewer capacity. Surface water runoff issues have not been adequately addressed	Thames Water has confirmed no objection to the scheme and further details will be provided at reserved matters stage and thereafter secured by condition to ensure the scheme is acceptable.

APPENDIX 12 – LIST OF RELEVANT POLICIES

Appendix 12 – Relevant Development Plan Policies

The Development Plan policies relevant to the site currently comprise the following:

TANDRIDGE DISTRICT CORE STRATEGY 2008

- Policy CSP1 – Location of Development
- Policy CSP2 – Housing Provision
- Policy CSP3 – Managing the Delivery of Housing
- Policy CSP4 – Affordable Housing
- Policy CSP7 – Housing Balance
- Policy CSP11 – Infrastructure and Services
- Policy CSP12 – Managing Travel Demand
- Policy CSP14 – Sustainable Construction
- Policy CSP15 – Environmental Quality
- Policy CSP17 – Biodiversity
- Policy CSP18 – Character and Design
- Policy CSP19 – Density
- Policy CSP21 – Landscape and Countryside

TANDRIDGE LOCAL PLAN PART 2: DETAILED POLICIES 2014–2029

- Policy DP1 – Sustainable Development
- Policy DP5 – Highway Safety and Design
- Policy DP7 – General Policy for New Development
- Policy DP10 – Green Belt
- Policy DP13 – Buildings in the Green Belt
- Policy DP18 – Community, Sports and Recreational Facilities
- Policy DP19 – Biodiversity, Geological Conservation and Green Infrastructure
- Policy DP20 – Heritage Assets
- Policy DP21 – Sustainable Water Management

CATERHAM, CHALDON AND WHYTELEAFE NEIGHBOURHOOD PLAN 2021

- Policy CCW1 – Housing Requirement
- Policy CCW3 – Housing Density Outside the Caterham Masterplan Area
- Policy CCW4 – Character of Development
- Policy CCW5 – Design of Development
- Policy CCW6 – Environmentally Sustainable Design
- Policy CCW10 – Locally Significant Views

NATIONAL PLANNING POLICY FRAMEWORK (UPDATED DECEMBER 2023)

Paragraph 11 – planning decisions should apply a “presumption in favour of sustainable development” and “where the policies which are most important for determining the application are out-of-date [such as not being able to demonstrate a five year supply]...unless the application of policies in this Framework that protect areas or assets of particular importance [Green Belt] provides a clear reason for refusing the development proposed; or any adverse impacts” of granting permission “would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole”.

Paragraph 38 – Local planning authorities should approach decisions in a positive and creative way and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.

Paragraph 41 – For their role in the planning system to be effective and positive, statutory planning consultees will need to take the same early, pro-active approach, and provide advice in a timely manner throughout the development process. This assists local planning authorities in issuing timely decisions, helping to ensure that applicants do not experience unnecessary delays and costs.

Paragraph 55 – Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.

Paragraph 66 – Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership.

Paragraph 96 – Decisions should aim to achieve healthy, inclusive and safe places and beautiful buildings which promote social interaction, are safe and accessible and enable and support healthy lifestyles.

Paragraph 108 – Transport issues should be considered in development proposals, including opportunities to promote walking, cycling and public transport.

Paragraph 110 – Policies should “support an appropriate mix of uses to minimise journeys needed for employment, shopping and leisure.”

Paragraph 115 – “Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

Paragraph 123 – “Decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.”

Paragraph 124 – Decisions should “promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.”

Paragraph 128 – “Planning policies and decisions should support development that makes efficient use of land, taking into account the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it” and “ the desirability of maintaining an area’s prevailing character and setting” and “the availability and capacity of infrastructure and services”.

Paragraph 131 – “The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”

Paragraph 135 – Decisions should function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development and should be visually attractive as a result of good architecture, layout and appropriate and effective landscaping. The paragraph also states that development should sympathetic to local character and history while not preventing or discouraging appropriate innovation or change

Paragraph 142 – “The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”

Paragraph 152 – “Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.”

Paragraph 152 – “When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.”

Paragraph 154 – “A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt”. Exceptions to this include “the partial or complete redevelopment of previously developed land, whether redundant or in continuing use” which would “not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.”

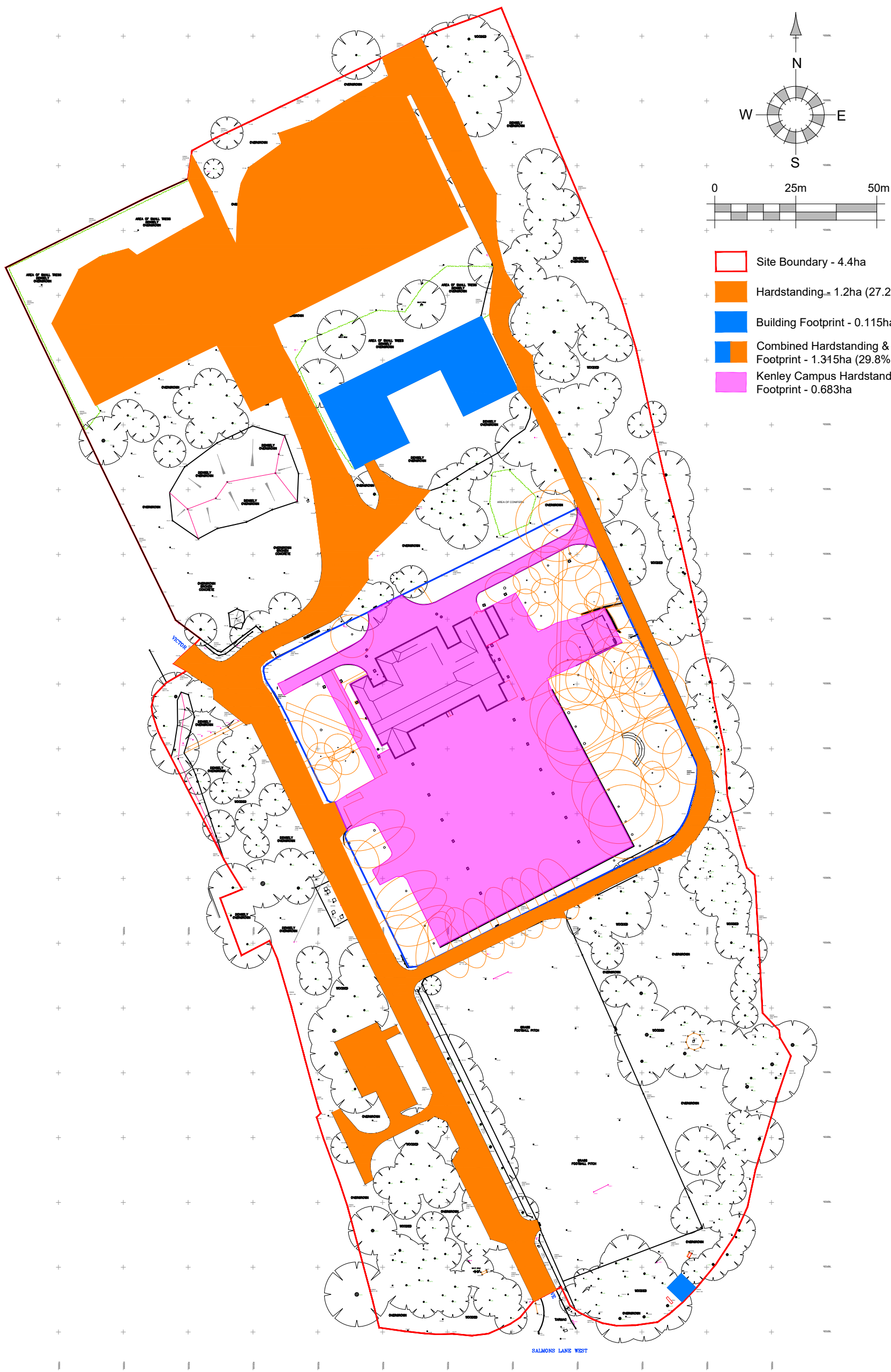
Paragraph 200 – “In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.”

Paragraph 201 – “Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise.”

Paragraph 208 – “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”

Paragraph 214 – “Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.”

APPENDIX 13 – EXISTING HARDSTANDING SITE PLAN



- Site Boundary - 4.4ha
- Hardstanding - 1.2ha (27.2%)
- Building Footprint - 0.115ha (2.6%)
- Combined Hardstanding & Building Footprint - 1.315ha (29.8%)
- Kenley Campus Hardstanding & Building Footprint - 0.683ha

REV.	DATE	REVISIONS:	BY	STATUS:

CLIENT: Croydon & District Education Trust	PROJECT: Kenley Campus, Caterham-on-the-Hill
SCALE: 1:1250 (A3 ORIGINAL)	DRAWING: Existing Hardstanding and Footprint Areas
DRAWN: AL DATE: 17/09/24	21125 P113 B



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APPENDIX 14 – LIMPSFIELD APPEAL DECISION



Appeal Decision

Inquiry Held on 28 February to 2 March 2023

Site visit made on 2 March 2023

by David Troy BSc (Hons) MA MRTPI

an Inspector appointed by the Secretary of State

Decision date: 11 April 2023

Appeal Ref: APP/M3645/W/22/3309334

Land West of Limpsfield Road, Warlingham CR6 9RD

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a failure to give notice within the prescribed period of a decision on an application for planning permission.
 - The appeal is made by Mr Neal MacGregor of CALA Homes (South Home Counties) Ltd against Tandridge District Council.
 - The application Ref 2021/2178, dated 17 December 2021.
 - The development proposed is construction of 100 dwellings (40% affordable) with associated infrastructure, landscaping and re-provision of sports facilities.
-

Decision

1. The appeal is allowed and planning permission is granted for construction of 100 dwellings (40% affordable) with associated infrastructure, landscaping and re-provision of sports facilities at Land West of Limpsfield Road, Warlingham CR6 9RD in accordance with the terms of the application, Ref 2021/2178, dated 17 December 2021, subject to the conditions in the attached schedule.

Procedural Matters

2. The appeal has been lodged in response to the Council's failure to issue its decision within the prescribed period. The Council appeal submissions outline that had it been in a position to determine the application, it would have refused planning permission on the basis of the proposal being considered inappropriate development in the Green Belt, its effect on the openness of the Green Belt and conflict with local and national policy relating to Green Belt where no very special circumstances existed to support the proposal.
3. I closed the Inquiry in writing on 16 March 2023 following the receipt of a signed and completed legal agreement pursuant to Section 106 of the Town and Country Planning Act 1990. The agreement sets out details for securing planning obligations in respect of affordable housing provision, off-site Public Rights of Way improvements, management of open space and play area, sustainable urban drainage system and travel plan monitoring and I return to these matters later.

Main Issues

4. The main issues are:
 - (i) Whether the proposal would be inappropriate development in the Green Belt and the effect of the proposal on the openness of the Green Belt and its purposes;
 - (ii) whether or not there is any 'other harm' that would result from the appeal proposal; and
 - (iii) Whether or not any harm to the Green Belt by reason of inappropriateness, and any 'other harm' identified as arising from the appeal proposal, would be clearly out-weighed by 'other considerations', so as to amount to very special circumstances.

Reasons

Green Belt considerations

Inappropriate development

5. The appeal site comprises of a small paddock, sports ground, including a pavilion, parking and playing pitches and adjacent agricultural fields which forms part of the open countryside. It is situated within the District's designated Green Belt.
6. The main parties' appeal submissions and Statement of Common Ground (SoCG) state that, whilst the re-provision of the sports facilities would not constitute inappropriate development in the Green Belt, the residential development as proposed would be inappropriate development in the Green Belt for the purposes of the National Planning Policy Framework (the Framework). It is then accepted by the main parties that the development as a whole constitutes inappropriate development in the Green Belt.
7. Based on the evidence provided, I agree with this conclusion. Paragraph 147 of the Framework states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

Openness of the Green Belt

8. The fundamental aim of Green Belt Policy is to prevent urban sprawl by keeping land permanently open. The Framework advises at Paragraph 137 that openness and their permanence are essential characteristics of Green Belts. Whilst there was some disagreement between the main parties on how openness is defined, the concept of openness generally has both a spatial and a visual dimension.
9. It is clear from the evidence provided and from my observations during my site visit that, given the screening provided by the mature landscaping around the site and relatively flat topography of the site and immediate surroundings, the proposed development would not be highly visible in the wider landscape. Whilst the re-provision of the sports ground on the adjacent agricultural fields, including a new pavilion, parking and playing pitches, would alter the appearance of the existing landscape, it would in my view have a limited impact on the sense of openness in this part of the site.

10. Nonetheless, on a more local level, the scale and form of the proposed residential development on the small paddock and existing sports grounds would not amount to a subservient form of development in this location. The main parties agreed that the perceived change to openness would be largely restricted to within the appeal site itself, the neighbouring residential properties and the Public Rights of Way adjacent and through the site, including the public bridleway running along the southern boundary of the site.
11. The small paddock alongside Limpsfield Road and existing sports ground immediately adjoins residential properties on the edge of Warlingham. These residential properties with their varied boundary enclosures together with existing pavilion, are clearly evident when viewed from the south. The occupants of neighbouring properties, the users of the public bridleway and Limpsfield Road, as they pass the site, currently enjoy views of it in its current largely undeveloped form.
12. Nonetheless, the combination of the site's topography, existing built-up backdrop and abundance of foreground vegetation mean that the appreciation of its openness in both spatial and visual terms, in the context of the wider Green Belt is currently very limited. Furthermore, the part of the appeal site, on which the residential development is proposed, is currently very well-contained from its wider countryside surroundings by existing mature vegetation and earth bunding along the western and southern boundaries of the site.
13. The appeal proposal would introduce a built development footprint and volume in the form of homes and supporting development including public highways, driveways, gardens and boundary enclosures. These would extend across a large part of this currently undeveloped site. This change would be accompanied by increased activity from prospective occupants and visitors reasonably associated with a residential use. In combination, the appeal proposal would reduce both the visual and spatial sense of openness.
14. However, the appellant's landscape assessment and viewpoints demonstrate that the existing high level of containment is capable of being maintained throughout the year and in places strengthened through careful landscape and design treatment. Overall, I concur with the appellant's assessment that very localised spatial and visual effects to openness would arise. Moreover, the proposed public open space within the residential development would ensure that a degree of openness within the site itself would be retained, albeit it would be framed by new homes. Therefore, I consider the residential development would result in a moderate impact on the sense of openness.
15. In light of these characteristics, the proposed change arising from the overall development would amount from a low to a moderate level of harm to the openness of this particular Green Belt.

Purposes of the Green Belt

16. The Council has previously assessed the contribution that the appeal site makes to the purposes of the Green Belt through various Green Belt Assessments to support its emerging Local Plan. In light of the appeal site's edge of settlement location and largely undeveloped nature I agree with the conclusion of the Council's Green Belt Part 3 Exceptional Circumstances and

Insetting Assessment (June 2018)¹ that it contributes to purpose (a) to check the unrestricted sprawl of large built-up areas; and also contributes to purpose (c) to assist in safeguarding the countryside from encroachment. It is common ground that the appeal site does not contribute to the other purposes of the Green Belt, with which I concur.

17. In terms of purpose (a), whilst the Council's witness identified no conflict regarding this purpose, the 2018 Green Belt Assessment records that the site "contributes to this purpose", but does not quantify the degree of impact on this purpose. The Council's Landscape Capacity and Sensitivity Study (April 2017) (CD8.22) assessed the appeal site as having a slight landscape sensitivity and value and a high capacity to accommodate housing development.
18. Although the proposed development would extend the existing built-up area into undeveloped Green Belt land, it would not project any further southwards or westwards than the existing built-up form. Moreover, the resulting pattern of infill development would be consistent with the existing irregular settlement form of Warlingham and the site's outer boundaries would remain physically and visually well contained by either built development, existing vegetation and earth bunding. For these reasons, the appeal proposal would have a limited impact on purpose (a) which seeks to check the unrestricted sprawl of large built-up areas.
19. In terms of the contribution that the site makes to purpose (c), I agree with the main parties that encroachment into the countryside would result. Nonetheless, based on the evidence before me and my site observations that encroachment would be limited to the site itself and parts of its immediate setting along Limpsfield Road, by reason of the site's physical and visual screening and its containment within wider viewpoints.
20. Consequently, I conclude that the appeal proposal would have a limited adverse impact on the purpose of safeguarding the countryside from encroachment.
21. In summary, in terms of these Green Belt considerations, I conclude that the appeal proposal is inappropriate development which is harmful by definition. The appeal scheme would also cause a low to a moderate level of harm to the openness of the Green Belt and limited harm to the purposes of including this site within it. In line with the Framework these harms attract substantial weight.
22. Policy DP10 of the Tandridge Local Plan 'Part 2: Detailed Policies' (2014) (LP) defines the extent of the District's Green Belt and contains specific control over any inappropriate development within it, in accordance with the aims of the Framework. Paragraph 147 of the Framework directs the decision-maker to resist inappropriate development in the Green Belt except in very special circumstances. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

¹ Core Document CD8.21

Other Harms

Landscape character and appearance

23. In terms of its character and appearance, the appeal site's existing character is typical of many of the features of the larger urban landscape character area² within which it sits. The site enjoys a high level of containment from the wider surrounding countryside as a result of the combination of peripheral vegetation and adjacency in part to the built-up area.
24. The appeal site does not fall within a valued landscape within the meaning of paragraph 174 of the Framework. The existing character of the site would change significantly as a result of the development proposal on the outdoor sports facilities and open undeveloped area of land and a change in the nature of the site would be an inevitable consequence of this.
25. However, in its wider setting, a substantial area of countryside would remain beyond the residential site. Overall, the appeal proposal would not cause the substantial erosion of the countryside forming this part of the District. Despite the loss of the appeal site to development, the prevailing overall character and setting of Warlingham's urban area would be maintained.
26. Furthermore, the appellant has demonstrated through their landscape evidence that a suitable mitigation strategy could be secured to limit the visual impact of the residential development throughout the year when viewed from the public bridleway and footpaths and the site's immediate surroundings. There would also be an opportunity to soften the existing edge to the existing built-up area. The retention and enhancement of existing field boundaries and hedgerows would help to integrate the development into the landscape and the additional landscaped buffer and earth bunding along the western edge of the housing site would provide new strong defensible boundary between the residential development and the Green Belt.
27. In terms of the re-provision of the sports facilities on the two agricultural fields on the western part of the site. The site is bounded by existing sports facilities and pitches at Warlingham Rugby Football club to the north, Greenacres Sports club to the south-east, the former Shelton sports ground to the south as well as woodland and fields to the west. Whilst the re-provision of the sports facilities would alter the appearance of the existing agrarian landscape, it would not in my view be significantly out-of-keeping with the surrounding uses and prevailing character of the area in this location.
28. I am therefore satisfied that the resulting development has scope to sit comfortably and successfully assimilate with its existing residential and countryside context. The important finer details of the scheme can be adequately controlled by planning conditions to ensure this. Although the appeal scheme will change the character and appearance of the site, on this particular occasion this does not translate to unacceptable harm to the character and appearance of the area.
29. Consequently, I conclude that the proposed development would not have an unacceptable harmful effect on the character and appearance of the area. The development would accord with the overall aims of Policy DP7 of the LP and Policy CSP18 of the Tandridge District Core Strategy (2008) (CS) which seek,

² Surrey Landscape Character Assessment – Tandridge Character Area (2015) (CD8.23)

amongst other things, to ensure development is of a high quality design that respects the local character and context and integrates effectively with its surroundings. In addition, it would accord with the aims of the Framework which states that decisions should recognise the intrinsic character and beauty of the countryside (paragraph 174).

Traffic and highway safety

30. It is common ground that being directly adjacent to Warlingham, the appeal site is accessible to a good range of services and facilities. However, the appeal proposal would still give rise to a notable increase in the level of traffic which would rely on the surrounding local highway network, including Limpsfield Road. Set against this, the appeal proposal would secure improved connectivity across the appeal site from existing residential areas to the wider bus routes, public footpath and cycle network.
31. The submitted details of the proposed access off Limpsfield Road and the associated changes are uncontested by the Local Highway Authority and National Highways. The appellant's extensive assessment of the highway impacts³ are also agreed, including the proposal having no adverse impacts on the nearby Warlingham gyratory junction as a result of the development and no objections on highway grounds to the likely traffic generation from the proposed sports facilities as compared to the existing sports facilities.
32. Furthermore, the imposition of the agreed schedule of planning conditions and planning obligations covering access, sustainable transport, pedestrian connectivity, and parking would adequately safeguard against any unacceptable highway related consequences of the appeal proposal. They would also ensure that the prospective occupants of the new housing and users of the new sports facilities enjoy a good level of accessibility to local services and facilities. My assessment of these matters leads me to the same conclusion as the main parties and Local Highway Authority.
33. In this context, whilst I appreciate the concerns raised by the interested parties about the access and the capacity of the local highway network, these are not substantiated by any substantive evidence. Based on the uncontested submitted highway evidence from the appellant, coupled with my own site observations, at different times of the day, I do not find that there will be an unacceptable impact on highway safety, or that the residual cumulative impacts on the road network will be severe.
34. The resulting improvements to pedestrian connectivity across the appeal site from existing residential areas to the wider bus routes, public footpaths and cycle network is a moderate benefit.
35. Overall, in the context of paragraph 111 of the Framework, Policy DP5 of the LP and Policy CSP12 of the CS, the predicted traffic and highway effects of the appeal scheme do not indicate to me that it should be refused. Consequently, subject to the imposition of suitably worded planning conditions to manage access and highway related details, there is no conflict with the development plan or the Framework in this regard.

³ Core Documents CD1.29 and CD1.30

Community infrastructure capacity

36. The appeal proposal will generate additional demands on healthcare and educational capacity. Interested parties have raised concerns about the capacity of these local services to support such increased demands. However, the main parties have identified that the appropriate contributions from the appeal scheme toward appropriate infrastructure to support the development can be secured through the Council's Community Infrastructure Levy (CIL) scheme⁴. I am satisfied that the adopted CIL scheme would allow the Council to secure appropriate educational and healthcare mitigation to address this at an appropriate stage in the delivery of the appeal scheme. Moreover, there is no substantiated evidence before me to corroborate the interested parties' concerns about educational and healthcare capacity to lead me to reject the main parties assessment on this matter.
37. Consequently, in the absence of harm there is no conflict with Policy CSP11 of the CS or the Framework in these regards. However, as these contributions towards educational and healthcare facilities would be mitigation, they do not constitute material benefits.

Living conditions

38. The submitted design and layout plans shows the proposed residential development would be located to the west of the existing dwellings on Limpsfield Road and to the south of Hamsey Green Gardens. Occupiers of these properties are currently able to look out across existing sports grounds and small paddock and, from the submitted evidence and my site inspection, it is clear that the appeal proposal would change those vistas.
39. Crucially, current Government guidance on determining planning applications indicates that planning is concerned with land use in the public interest rather than the protection of purely private interests. In terms of resulting levels of outlook, disturbance, privacy, daylight and sunlight, the submitted drawings demonstrate that there is sufficient scope to secure appropriate separation distances, building heights and landscaping through the submitted design and layout plans and planning conditions. I find that although there would be change for those existing occupants, this would not amount to a situation which would lead to unacceptable living conditions.
40. Consequently, I conclude that the proposal would not result in significant harm to the living conditions of the occupiers of the neighbouring properties. Accordingly, there would be no conflict with Policy DP7 of the LP and Policy CSP18 of the CS which seek, amongst other things, to ensure development does not significantly harm the amenities of neighbouring properties. In addition, it accords with the Framework that development should seek to create places that promote health and well-being, with a high standard of amenity for existing and future users (paragraph 130).

Ecology, Biodiversity and Trees

41. Although the appeal proposal will result in the loss of largely undeveloped sports grounds and paddock as well as the change of use and development of the existing agricultural fields, the main parties' evidence confirms that the existing sports ground and agricultural fields are of limited ecological value due

⁴ Core Documents CD1.2, CD1.52 and CD1.53

to the nature of the existing activities and management of the playing pitches and agricultural fields. However, the hedgerows and established trees along the boundaries are identified as supporting greater biodiversity.

42. The appeal scheme shows that the boundaries would be retained as a green link that would connect to the proposed open space. The appellant's evidence identifies opportunities to increase biodiversity and create new species rich habitats to support new foraging activity for species on the site as well as those originating from beyond the site. I also acknowledge that linkages to existing wildlife corridors would be improved as part of the green infrastructure proposals that would provide some compensatory improvements to the Green Belt in this particular location.
43. At the time of the submission of the appeal there was an outstanding matter relating to dormouse and reptile surveys which had been seasonally constrained. This additional ecological survey information has now been submitted by the appellant and the Surrey Wildlife Trust have indicated in their subsequent response, that they have no objections to the proposal, subject to appropriate conditions and mitigation. The ecological, landscaping and Green Infrastructure provision would offer the opportunity to promote the health and well-being of the local people and the biodiversity in the area, key social and environmental objectives of the Framework.
44. The submitted ecological evidence demonstrates that appropriate mitigation can be secured to avoid any residual harm. Furthermore, a biodiversity net-gain of around 22% for habitats and 10% for hedgerows is proposed⁵ and this could be delivered as part of the green infrastructure proposals. The Framework only requires a net-gain, and the proposal therefore goes significantly beyond current policy requirements. Consequently, this aspect of the biodiversity proposals is a moderate benefit of the appeal scheme.
45. The submitted arboricultural assessment, method statement and tree protection plan demonstrates that appropriate mitigation can be secured relating to the existing trees and hedgerows on the site.
46. Overall, the appellant has demonstrated that, subject to the above-mentioned conditions, the appeal proposal would not conflict with Policy CSP17 of the CS, Policy DP19 of the LP or paragraph 180 of the Framework.

Public Rights of Way

47. The existing public footpaths Nos. 52 and 110 and bridleway No. 88 run through or adjacent to the appeal site. Interested parties have raised concerns about the impact on the Public Rights of Way (PROW), including the diversion of footpath No. 52 to accommodate the new playing pitches and pavilion. However, no objections were received from Surrey County Council Countryside Access Officers to the proposal, subject to appropriate conditions and measures. I am satisfied that the submitted legal agreement would secure appropriate PROW improvements and mitigation to address this at an appropriate stage in the delivery of the appeal scheme.
48. The appeal scheme would also change the existing visual and auditory experiences of those who use the existing PROW. However, the appeal proposal would retain the public vistas through the new sport facilities and establish

⁵ Core Documents CD2.6 and CD2.7

some new public views through the proposed open space within the development. These public vistas and the improved connectivity would, in part, offset the contextual changes which would be experienced by users of public footpaths Nos. 52 and 110 and bridleway No. 88. In addition, there would be scope through planning conditions to achieve a high-quality environment through the careful treatment of layout, design and landscaping.

49. Consequently, subject to the above-mentioned legal agreement and conditions, the appeal proposal would not conflict with Policy CSP13 of the CS and Policy DP5 of the LP that seek, amongst other things, to ensure proposals retain or enhance existing footpaths and protect the Rights of Way network. In addition, it would accord with the aims of the Framework that seeks to provide safe and suitable access for all users (paragraph 110).

Flood risk and surface water drainage

50. The site is located in Flood Zone 1 as defined in the Environment Agency's Flood Mapping for the area, where there is a low risk of flooding.
51. The increased areas of hardstanding and development of the site would inevitably increase the need for appropriate measures to deal with potential flood risk, surface water and foul water drainage. The appellant has provided a Flood Risk Assessment and Drainage Strategy setting appropriate measures for the site. I am mindful that the Environment Agency and the Lead Local Flood Authority raised no objections to the proposal, subject to appropriate planning conditions, including the use and maintenance of Green Infrastructure and Sustainable Urban Drainage Systems.
52. Consequently, in the absence of any substantive evidence to the contrary, I consider that the appellant has adequately demonstrated that the proposed development would not adversely impact on flood risk and surface water drainage, in accordance with the requirements of Policy DP21 of the LP that seeks, amongst other things, to ensure proposals reduce the potential risk of flooding. In addition, it would accord with the aims of the Framework that seeks to direct development away from the areas at highest risk of flooding (paragraph 159).

Summary of harmful effects

53. In summary, I find no other harm to add to the harm to the Green Belt as described earlier.

Other considerations

Emerging housing allocation

54. The area within the appeal site that is proposed for residential development is allocated for housing in the submission version of the emerging Tandridge Local Plan 2033 (January 2019) (ELP). This draft allocation is supported by a Policy HSG15 that identifies the appeal site as HSG15A. The emerging allocation is supported by the Council, which is of the view that some Green Belt release is required to meet the current housing requirement. As a result, the emerging policy sets a direction of travel that would see the appeal site removed from the Green Belt and allocated for housing.

55. That said, the Council at the Inquiry consider that the status of the emerging housing allocation in the ELP now needs to be tempered by the publication of the Government's Written Ministerial Statement of 5th December 2022 (WMS) and the subsequent proposed changes to the Framework published for consultation on 22 December 2022. The Council witness considered it would be premature to make a decision giving weight to the emerging allocation in light of these proposed changes. Whilst this may be so, the WMS sets out proposals for consultation rather than immediate changes to government policy and the proposed changes to the Framework has only recently completed its consultation period.
56. The Council have also acknowledged in their recent advice to the Council's Planning Policy Committee on 19 January 2023 (CD8.8), that the proposed changes to the Framework would have no effect on the ELP, which is being examined under the Framework 2012 and the transitional arrangements introduced in the Framework 2018. Consequently, I can only afford limited weight to these matters in making my decision.
57. In relation to the ELP, the Council acknowledges in its recent advice and draft minutes to the Council's Planning Policy Committee on 19 January 2023⁶, that it intends to continue to proceed with the ELP and carry it forward to adoption. Whilst the ELP has been at examination for some time since 2019, the main parties indicated that the Local Plan Inspector in his preliminary findings following the initial hearings (December 2020) (CD5.2) raised no specific concerns to the principle of the housing allocation HSG15A and that there were no unresolved objections to the principle of the proposed allocation from the statutory consultees.
58. Interested parties have raised concerns about the ELP, including the density of the housing development now proposed as part of the appeal scheme and that proposed allocation HSG15A needs to be constructed in conjunction with the proposed allocation HSG15B on land immediately to the south of the appeal site. However, the Council and appellant indicated during the Inquiry that the estimated housing density figure outlined in Policy HSG15 was indicative only based on the standard density calculation and that there was no requirement in the policy for two sites to be developed together.
59. Given the above-mentioned, in light of the stage in the preparation of the ELP, evident lack of unresolved objections to the principle of the proposed housing allocation on the appeal site in Policy HSG15 in the ELP and the consistency with the Government's objectives to significantly boost the supply of the homes in the Framework, having regard to the advice provided in paragraph 48 of the Framework, I give this matter moderate weight in my decision.

Interim Policy Statement for the Housing Delivery

60. In September 2022, the Council adopted an Interim Policy Statement for the Housing Delivery (IPSHD) to enable increased housing delivery and boost housing supply in the District in the short and medium term. This interim criteria based policy forms part of the Council's Housing Delivery Test and Action Plan (CD8.7), which acknowledges that the IPSHD will be an important material consideration in the determination of planning applications.

⁶ Core Documents CD8.8, CD8.9 and CD9.1

61. The IPSHD sets out that applications will be invited to come forward in certain circumstances including housing sites included in the emerging Local Plan where the examiner did not raise concerns. The Council's evidence at the Inquiry stated that the appeal site would meet the criteria in the IPSHD.
62. However, the IPSHD does not form part of the development plan nor is a supplementary planning document, that has been subject to public consultation. Therefore, whilst it is matter to which I can only give limited weight, given its non-statutory status, it is nonetheless a matter which weighs in favour of the proposal.

Past and future housing land supply and delivery

63. It is common ground that the Council cannot demonstrate a five year housing land supply. The Council's latest Annual Monitoring Report (CD8.12) identifies a housing land supply of 1.57 years, based on a standard method local housing needs figure for the district, as compared to the appellant's assessment at just 1.38 years (CD8.28). The submitted evidence also demonstrates that in terms of overall housing delivery, the Council have delivered only 38% of its required housing over the past three years and as a result the District is the 6th poorest performing out of the 321 local authorities nationally. The result of the Housing Delivery Test (the HDT) shows that the Council has failed to deliver its annual housing requirement in previous years, with the Council delivering only 65% in 2018, 50% in 2019 and 50% in 2020 respectively.
64. The particular appeal scheme's significant contribution to boosting the Borough's overall housing land supply and delivery for an appropriate mix of households within the next 5 years is not disputed by the Council. Irrespective of the definitive supply figure, it is clear that the identified future housing land supply is substantially short of the 5-year requirement.
65. The HDT results demonstrate that such inadequate housing delivery has been persistent. Furthermore, the submitted evidence does not indicate that there are other more suitable alternative sites for housing development either in the Green Belt or elsewhere which would provide at least some prospect of an improving picture whilst the ELP is being examined should this appeal be dismissed.
66. The persistent shortfall in housing delivery means the requirement for a HDT Action Plan (September 2022) (CD8.7) has been triggered as a sanction to address these serious failings, that includes bringing forward sites on brownfield and Green Belts sites from the ELP, in line with the IPSHD.
67. In short, the evidence before me conveys at this particular moment in time the continuation of what is already an acute deficiency and shortfall in the local housing supply and delivery. The capability of the appeal proposal to contribute significantly to addressing the identified extremely serious housing land supply and delivery deficits weighs significantly in favour of this appeal.

Ability to meet affordable housing needs

68. The Council's updated Strategic Housing Market Assessment Affordable Housing Needs Assessment (June 2018) (CD8.11) and the appellant's Affordable Housing Needs Update Note (CD8.28) outline there is an identified affordable housing need of 310-391 home per year in Tandridge. However, the Council's latest Annual Monitoring Report (CD8.12) indicates that an average of just 68

affordable homes have been completed annually in Tandridge since 2006. This is exacerbated by the uncontested affordable housing evidence from the appellant which demonstrates an enormous shortfall in delivery of homes over the next 5-year period equating to about 53 affordable homes per annum.

69. This existing position is a clear symptom arising from the continuing overall housing land supply and delivery deficiencies of the Borough. There is a persistent trend of a significant number of people being unable to access their own affordable home in the District unless suitable, technically unconstrained, well located housing sites which are capable of meeting those needs, are brought forward.
70. The appeal scheme proposes the delivery of 40 affordable units of a range of types and sizes to reflect the varied needs of the Borough. This is in excess of the Council's requirements that up to 34% of dwelling will be affordable which is set out in Policy CSP4 of the CS. The significance of this particular appeal scheme's level of contribution to boosting an appropriate mix of affordable housing in the Borough within the next 5 years is not disputed by the Council.
71. The submitted legal agreement contains planning obligations which are capable of securing the appropriate level and mix of proposed affordable housing provision, management of the nomination rights and local criteria to support the delivery of the affordable home for local people in Tandridge. The legal agreement, as a mechanism to ensure that the appeal scheme delivers the important housing benefits of the appeal proposal weighs very heavily in favour of the appeal proposal.
72. In summary, the evidence before me demonstrates an ongoing acute and continuing extremely bleak outlook for local affordable housing provision. The capability of the appeal proposal to contribute significantly to addressing the existing and predicted very serious affordable housing shortfall within the next 5 years attracts significant weight in favour of this appeal.

Re-provision of Sport facilities

73. The site currently accommodates Hamsey Rangers Football Club, with a sports clubhouse, parking and football pitches. The re-provision of the sports facilities would including a new pavilion, parking and football playing pitches catering for a range of age groups. The size of the playing area would increase from 2.45ha to c.3.7ha with the number of pitches increasing from four/five to six/seven (depending on the pitch configuration) with improved drainage.
74. Interested parties have raised concerns about the new sport facilities, including the loss of the existing playing pitches and that the new pavilion provided would be smaller than the existing clubhouse, particularly its mixed-use space for social and community events. There is concern that the space provided in the new pavilion would make the running of the Warlingham Day Nursery, which currently operates its business from the existing clubhouse, and the current range of community activities and events, unviable to operate and as such would undermine the future financial sustainability of the sports club.
75. However, I am mindful that I received no objections from Sports England to the new sports facilities, subject to appropriate condition to ensure the phasing of the new sports facilities in conjunction with the new housing development on the existing sports grounds. Sports England response dated 16 August 2022

(CD1.70) concludes following an assessment of the proposal that the replacement sports playing fields, pavilion and ancillary provision will be better than the existing site and therefore meet the requirements in paragraph 99 of the Framework.

76. In addition, the appellant has confirmed that, in a letter dated 26 January 2023 from owners of the existing sports ground, the John Fisher Old Boys Association (CD8.28), gave their support for the new sports facilities which they consider would deliver a huge improvement, both in terms of the quality of the playing pitches as well as the associated club infrastructure.
77. The Framework seeks replacement sports and playing pitches facilities of equivalent or better provision in terms of quantity and quality in a suitable location. The re-provision and enhancement of the sports facilities meets these current policy requirements and as such this aspect of the proposal is a moderate benefit of the appeal scheme.
78. Consequently, in the absence of any substantive evidence to the contrary, the appellant has demonstrated that, subject to the above-mentioned conditions, the appeal proposal would not conflict with Policy CSP13 of the CS, Policy DP18 of the LP or paragraph 99 of the Framework.

Other Benefits

79. Aside from provision of market and affordable housing to meet local housing need and facilitating re-provision of the sports facilities, the contributions towards new public open space, while necessary to mitigate the impact of the additional population from the development, would also be available to all residents in the local area. These contributions together with the provision of a local equipped area of play within the development are social benefits of the scheme which carry moderate weight.
80. The economic benefits of development would include investment in construction and related employment for its duration. There would also be an increase in subsequent local household expenditure and demand for services. The additional population would increase spending in the local economy to provide long term support for local shops and services, supporting a prosperous economy. This is a key objective of the Framework and are economic benefits that carry moderate weight.
81. The commitment to higher energy efficiency, on-site renewable energy provision, high standards of design and sustainable transport measures are clear environmental benefits, representing a move towards a low carbon economy and promoting more sustainable means of travel. These are key objectives of the Framework and are environmental benefits that carry moderate weight.

Other Matters

82. Whilst concerns about prematurity have been raised, I consider the development is not so substantial or that its cumulative effect so great that it would undermine the plan making process. Whilst the ELP is at an advanced stage, it has been at examination for some time and neither the main modifications nor the Inspector's report has yet been published. Therefore, looking at the ELP as a whole, having regard to the advice provided in the Framework (paragraph 49), I give this matter limited weight in my decision.

83. I have considered the Council's argument that the granting of planning permission would set a precedent for other similar developments. However, each application and appeal must be determined on its individual merits, and a generalised concern of this nature does not justify withholding permission on these grounds in this case.
84. Various references have been made in evidence and submissions to other planning decisions and judgements, all of which have been considered. Each turns on its own individual facts and, whilst generally relevant to varying degrees, none dissuade me from the assessments and conclusions based upon the particular circumstances of this appeal.
85. I have taken into account the objections received from Warlingham Parish Council, Save Warlingham's Green Belt Group and interested parties to the proposal. These include loss of Green Belt land contrary to national and local planning policies, prematurity and undermining the ongoing ELP process, unsustainable location, accessibility of the site to local services and facilities, capacity of local infrastructure, schools, doctors and local facilities, impact of the proposal on the character of the area, sports and recreational facilities and the amenities of local residents, particularly during the construction period, impact on footpaths/bridleway, access, parking, traffic, highway safety, flooding and drainage, external lighting, noise and air pollution, loss of habitats, biodiversity and trees.
86. However, I have addressed the matters relating to the Green Belt, landscape character and appearance, traffic and highway safety, living conditions of the neighbouring properties, community infrastructure, footpaths and bridleway, ecology, biodiversity and trees, flooding and drainage, sports facilities and the ELP in the main issues above.
87. In terms of securing a sustainable pattern of development, based on the evidence before me and my observations during my site visits, the site would be well-related to day-to-day services and facilities in Warlingham and is accessible by a range of transport modes, including a good bus service running pass the site along Limpsfield Road. Opportunities exist to improve pedestrian, cycling and public transport links as part of the proposed development.
88. Concerns relating to the impact on the external lighting and construction noise and disturbance can be addressed through the imposition of planning conditions. The Noise Assessment (CD1.37) submitted with the application and reviewed by the Council demonstrates that the scheme would not harmfully affect noise quality. The same can be said of air quality, subject to a carefully considered design and layout, appropriate conditions and mitigations.
89. The other matters raised did not form part of the Council's reasons for refusal. I am satisfied that these matters would not result in a level of harm which would justify dismissal of the appeal and can be dealt with by planning conditions or through the Section 106 Agreement, where appropriate. In addition, I have considered the appeal entirely on its own merit and, in the light of all the evidence before me, this does not lead me to conclude that these other matters, either individually or cumulatively, would be an overriding issue warranting dismissal of the appeal.

Section 106 Agreement

90. Paragraph 57 of the Framework and Regulation 122 of the Community Infrastructure Levy (CIL) Regulations 2010 (as amended) require that planning obligations should only be sought, and weight attached to their provisions, where they are: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.
91. The signed and completed Section 106 Agreement makes various commitments to mitigation, additional to arrangements for the provision of affordable housing and contribution of £55,000 towards PROW improvements and £4,600 towards travel plan monitoring. These provisions include for the on-going management and maintenance of the open spaces, play area and the Sustainable Urban Drainage System within the development.
92. I am satisfied that the proposed contributions and provisions set out above are necessary, directly related, and fairly and reasonably related in scale and kind to the proposed development, in accordance with the Framework and CIL Regulations. The contributions and provisions in the Section 106 Agreement and how they would be spent are supported by the relevant local plan policies, representations from the Council's consultees, and appeal statements and the Statement of Common Ground between the main parties. As, however, these obligations constitute mitigation, they do not constitute material benefits.

Whether Very Special Circumstances exist

93. I have found that the appeal proposal represents inappropriate development in the Green Belt, which is harmful by definition. It would also cause low to a moderate level of harm to openness and limited harm to the two purposes of including the appeal site in the Green Belt. In accordance with paragraph 148 of the Framework, any harm to the Green Belt must be given substantial weight, weighing against the appeal proposal.
94. In terms of other harms, my findings in respect of the effect on character and appearance, traffic and highway safety, living conditions, community infrastructure, footpaths and bridleway, flood risk and drainage are of neutral consequence and add no other harms to my assessment. The proposal accords with the overall aims of the relevant development plan policies set out in the LP and CS. Other potentially adverse effects would be overcome or satisfactorily mitigated by planning conditions and the Section 106 Agreement.
95. On the other hand, the appeal scheme would assist in addressing the acute and persistent housing supply shortfall and would deliver affordable housing in an area of high need. I attach substantial weight to the critically needed housing benefits of the scheme. The appeal scheme would provide other benefits including the re-provision of enhanced sports facilities, a net gain in biodiversity and the accumulation of economic, social and environmental benefits that add moderate weight in favour of the proposal. Emerging policy also seeks to release the appeal site from the Green Belt for housing and is a matter that adds further moderate weight in favour of the proposal. Overall, in my view, I consider that collectively the other considerations in this particular case are of a very high order.

96. In that context, I find the harm to the Green Belt by reason of inappropriateness, and any other harm identified as arising from the appeal proposal, would be clearly out-weighted by the other considerations identified. Accordingly, the very special circumstances necessary to justify the development have been demonstrated and therefore a conflict with Policy DP10 of the LP, and Paragraph 148 of the Framework, would not occur. Further, given the existence of very special circumstances, it follows that the application of the Framework's Green Belt policies does not provide a clear reason for refusing planning permission.⁷

Conditions

97. Having regard to the Framework and Planning Practice Guidance, I have considered the suggested planning conditions submitted and agreed by the Council and the appellant in the SoCG⁸ and during roundtable discussion at the Inquiry. In addition to the standard time limit condition, I have specified the approved plans and details as this provides certainty (1 & 2). Those conditions relating to the detailing of the external materials and finishes, site levels and hard and soft landscaping works are necessary in order to safeguard the character and appearance of the area (3, 4, 5 & 6). A condition relating to the proposed play area on the site is necessary in order to safeguard the amenities of future occupants of the development (7).
98. A condition relating to a detailed Tree Protection Plan and Arboricultural Method Statement and the protection of the existing trees and hedges on the site are necessary in order to ensure their survival and to protect the visual amenity of the trees and hedges on the site (8 & 9). A condition relating to the submission of a Landscape and Ecological management plan, updated badger survey and reptile mitigation strategy are necessary to ensure the protection and enhancement of biodiversity on the site (10, 11 & 12). A condition relating to a sensitive lighting management plan is necessary to protect any protected species in the area (13).
99. For the construction period, in order to mitigate the environmental impact of development works and to protect the amenities of occupants of neighbouring properties, the submission of a Construction Transport Management Plan, Construction Environmental Management Plan and a condition relating to piling, deep foundations and other intrusive groundwork are necessary (14, 15 & 16). Details of surface water and sustainable urban drainage systems arrangements are necessary in order to ensure adequate drainage facilities are provided and to mitigate against potential flooding and the pollution of the water environment (17 & 18).
100. A range of highway improvements are necessary to limit highway impact and to encourage and promote sustainable transport including access visibility zones (19), parking and vehicle turning arrangements (20 & 21), cycle parking and e-bike charging points, (22 & 23), revised travel plan (24), car club vehicle (25) and a package of measures in general accordance with the Highway Arrangements Plan drawing no.170523-09 Rev C (26). Conditions relating to electric vehicle charging points are necessary in order to promote sustainable transport and reduce greenhouse gas emission (27 & 28).

⁷ See Footnote 7 of the Framework

⁸ Core Document 8.39

101. A condition relating to the installation of the solar thermal systems and solar photovoltaic modules is necessary in order to promote on-site renewable energy provision and reduce greenhouse gas emission (29). A condition relating to the construction and phasing of the sports facilities is necessary to ensure the satisfactory quantity, quality and accessibility of compensatory provision which secures a continuity of use on the site (30).
102. In light of my findings, given that the proposal is acceptable on its own merits for the reasons above, there are no exceptional circumstances in this instance that would justify the removal of permitted development rights in connection with the residential development that are reasonable and necessary to make the development acceptable.
103. I consider all the conditions to be reasonable and necessary to the development of the site. I have reworded some of them for consistency and have reordered them for clarity. Some of the particular requirements involve work to be done before development can start on site or before the development can be occupied. These measures are so fundamental to the acceptability of the proposal that it would be otherwise necessary to refuse planning permission.

Planning Balance

104. The Council accepts that it cannot demonstrate a five year supply of deliverable housing sites, as such the tilted balance in paragraph 11d) of the Framework is engaged. The benefits of the development as described above would be collectively very extensive. Consequently, overall, in my view, the adverse impacts arising from this development would not significantly and demonstrably outweigh the scheme's benefits. The proposal would therefore represent a sustainable form of development when assessed against the Framework read as a whole, which is a further material consideration in favour of the development. Therefore, there is no justified basis to resist the appeal proposal.

Conclusion

105. For the reasons given above, and having regard to all other matters raised, I conclude that the appeal should be allowed.

David Troy

INSPECTOR

APPEARANCES

FOR THE APPELLANT:

Reuben Taylor KC	King's Counsel, Landmark Chambers
Matthew Taylor	Planning Director, Lichfields
Andrew Cook	Executive Director, Pegasus

FOR THE COUNCIL:

Clifford Thurlow	Interim Chief Planning Officer, Tandridge District Council
Paul Batchelor	Senior Planning Officer, Tandridge District Council

INTERESTED PARTIES:

Sarah Johnson	Save Warlingham's Green Belt Group
Lisa Dunning	Save Warlingham's Green Belt Group
Lauren Gates	Save Warlingham's Green Belt Group
Cllr Robin Bloore	Local Councillor
Cllr Keith Prew	Local Councillor
Cllr Jeremy Pursehouse	Local Councillor
Gintare Vaiciuliene	Interested Party
David Durrant	Interested Party
Margaret Lambert	Interested Party
Rod Hay	Interested Party

INQUIRY CORE DOCUMENTS LIST

CD1 Planning Application Documents and Plans

Application Submission Documents and Plans

CD1.1 Five Year Housing Land Supply Assessment December 2021

CD1.2 Benefits Statement December 2021

CD1.3 Planning Statement December 2021

CD1.4 Landscape and Visual Impact Assessment (LVIA) December 2021

CD1.5 Design and Access Statement (DAS) December 2021

CD1.6 Application Forms

CD1.7 ANCILLARY BUILDINGS SINGLE GARAGE 2 ELEVATIONS AND FLOORPLANS REV B

CD1.8 House Type Alder Floorplans and Elevations

CD1.9 House Type Bayberry Floorplans and Elevations

CD1.10 House Type Blackthorn Floorplans and Elevations

CD1.11 House Type Chestnut Floorplans and Elevations

CD1.12 House Type Fir Floorplans and Elevations

CD1.13 House Type Fir 2 Floorplans and Elevations

CD1.14 House Type Larch Floorplans and Elevations

CD1.15 House Type Rowan Floorplans and Elevations

CD1.16 House Type Walnut Floorplans and Elevations

CD1.17 House Type Whitebeam Floorplans and Elevations

CD1.18 House Type Willow Floorplans and Elevations

CD1.19 Ancillary Buildings Bin Store- Plots 40-50, 46-54 & Club Elevations and Floorplans

CD1.20 Ancillary Buildings Cycle Store- Plots 40 - 54 Elevations and Floorplans

CD1.21 Ancillary Buildings Bin & Cycle Store- Plots 92- 100 Elevations and Floorplans

CD1.22 Ancillary Buildings Sub Station Elevations and Floorplans

CD1.23 Location Plan

CD1.24 Coloured Street Scene Planning Drawing

CD1.25 ANCILLARY BUILDINGS DOUBLE GARAGE 1 ELEVATIONS AND FLOORPLANS

CD1.26 ANCILLARY BUILDINGS SINGLE GARAGE 1 ELEVATIONS AND FLOORPLANS

CD1.27 ANCILLARY BUILDINGS DOUBLE GARAGE 2 ELEVATIONS AND FLOORPLANS

CD1.28 Planning Application Summery Dec 21

CD1.29 Transport Statement plus Appendix A -O

CD1.30 Transport Statement Appendix P

CD1.31 Travel Plan

CD1.32 Arboricultural Assessment and Method Statement

CD1.33 Tree Protection Plan

CD1.34 Cala Homes – Feasibility Report on Limpsfield Road Development

CD1.35 Cala Homes – Feasibility Report on Limpsfield Road Development (1)

CD1.36 Landscape Management Plan

CD1.37 Environmental Noise Survey and Acoustic Design Statement Report

CD1.38 Flood Risk Assessment and Drainage Strategy

CD1.39 Flood Risk Assessment and Drainage Strategy Appendix A - C

CD1.40 Flood Risk Assessment and Drainage Strategy Appendix D - J

CD1.41 Flood Risk Assessment and Drainage Strategy Appendix K

CD1.42 Flood Risk Assessment and Drainage Strategy Appendix L -P

CD1.43 Manual for managing trees on development sites
CD1.44 House Type 1BB Front Gable Floorplans and Elevations
CD1.45 House Type 1BB Side Gable Floorplans and Elevations
CD1.46 Archaeological Desk-based Assessment
CD1.47 HER Data Map
CD1.48 HER Data
CD1.49 HER Events Map
CD1.50 Biodiversity Checklist
CD1.51 Energy and Sustainability Statement
CD1.52 CIL Form 1
CD1.53 CIL Form 2
CD1.54 Local Validation Checklist
CD1.55 Statement of Community Involvement
CD1.56 Preliminary Ecological Appraisal (Playing Pitches)
Consultee Responses
CD1.60 Surrey County Council Countryside Access Officer consultee response
21 February 2022
CD1.61 TDC Planning Policy consultee response 24 February 2022
CD1.62 Surrey County Council Highways consultee response 29 September
2022
CD1.63 Surrey County Council Highways consultee response 16 March 2022
CD1.64 London Borough of Croydon 08 March 2022
CD1.65 Environment Agency 17 June 2022
CD1.66 Natural England 01 March 2022
CD1.67 Surrey County Council Flood Risks and Planning (LLFA) 02 March 2022
CD1.68 Sports England 16 August 2022
CD1.69 Sports England 25 August 2022
CD1.70 Sports England 16 August 2022
CD1.71 Surrey Policy 11 February 2022
CD1.72 Surrey Wildlife Trust consultee response 16 March 2022
CD1.73 Surrey Wildlife Trust consultee response 18 August 2022
CD1.74 National Highways consultee response 26 October 2022
CD1.75 Surrey Wildlife Trust consultee response 1 December 2022
CD1.76 Sport England Correspondence and site construction access plan dated
20 September 2022
CD1.77 Sport England Correspondence dated 21 September 2022

CD2 Additional/Amended Reports and/or Plans submitted after validation

CD2.1 Alternative Sites Report March 2022
CD2.2 Illustrative Landscape Masterplan (Rev P03) 10-08-2022
CD2.3 Overall Coloured Site Layout Plan (Rev D)
CD2.4 Agricultural Land Classification Report
CD2.5 Ecological Impact Assessment
CD2.6 Biodiversity Net Gain Assessment
CD2.7 Biodiversity Net Gain Metric 3.0
CD2.7 HOUSE TYPE AFFORDABLE FLATS 1- 1B & 2B PLANS & ELEVATIONS
CD2.8 HOUSE TYPE AFFORDABLE FLATS - 1B PLANS & ELEVATIONS
CD2.9 HOUSE TYPE AFFORDABLE FLATS - 1B & 2B PLANS & ELEVATIONS
CD2.10 HOUSE TYPE BELLFLOWER FLOORPLANS AND ELEVATIONS
CD2.11 HOUSE TYPE CLOVER FLOORPLANS AND ELEVATIONS
CD2.12 HOUSE TYPE ARUM FLOORPLANS AND ELEVATIONS
CD2.13 Site Layout Planning Drawing

CD2.14 Coloured Site Layout Planning Drawing Rev N
CD2.15 SITE LAYOUT PLANNING DRAWING Sports Pitches
CD2.16 Tenure Plan Rev E
CD2.17 Storey Heights R
CD2.18 Dwelling Types
CD2.19 Parking Plan
CD2.20 Refuse Plan Rev C
CD2.21 Materials Plan
CD2.22 ENCLOSURE PLAN Rev C
CD2.23 Fire Strategy Plan Rev C
CD2.24 Sports Pavilion Elevations and Floorplans Rev H
CD2.25 Hard Landscape 1 of 5 Rev P02
CD2.26 Hard Landscape 2 of 5 Rev P02
CD2.27 Hard Landscape 3 of 5 Rev P02
CD2.28 Hard Landscape 4 of 5 Rev P02
CD2.29 Hard Landscape 5 of 5
CD2.30 Soft Landscape 1 of 5 Rev P03
CD2.31 Soft Landscape 2 of 5 Rev P03
CD2.32 Soft Landscape 3 of 5 Rev P03
CD2.33 Soft Landscape 4 of 5 Rev P04
CD2.34 Soft Landscape 5 of 5 Rev P04
CD2.35 HOUSE TYPE GARDENIA FLOORPLANS AND ELEVATIONS
CD2.36 OVERALL SITE LAYOUT PLANNING DRAWING
CD2.37 Site Construction Access Plan (Area Calculations) @A1
CD2.38 Dwelling Types (Housing Mix) Plan Rev C
CD2.39 Site Layout Rev V
CD2.40 Proposed Highway Arrangements Plan Rev C
CD2.41 Proposed Highway Arrangements Plan Rev C
CD2.42 Proposed Access Arrangements Plan 2 Rev B
CD2.43 Hedge Punctuation: Method Statement for Reptiles
CD2.44 Hedge Punctuation: Non-licenced Method Statement for Dormouse

CD3 Committee Report and Decision Notice

N/A

CD4 The Development Plan

CD4.1 TDC Core Strategy (October 2008)

CD4.2 TDC Local Plan Part 2: Detailed Policies (July 2014)

CD5 Emerging Development Plan

CD5.1 Tandridge Our Local Plan 2033 (Regulation 22 Submission) January 2019

CD5.2 ID16 Emerging Local Plan Inspector Preliminary Conclusions Advice December 2020

CD5.3 TED48 TDC Letter - Update on Transport Modelling and Alternative Option 27 August 2021

CD6 Relevant Appeal Decisions Note

CD6.1 APP/C2741/W/19/3227359 – North of Boroughbridge Road, York

CD6.2 APP/Q3115/W/19/3230827 – Oxford Brookes University, Wheatley Campus

CD6.3 APP/V1505/W/22/3298599 – Land North of Kennel Lane, Basildon

CD6.4 APP/C2741/W/21/3282969 – North Lane , Huntington, York

CD6.5 APP/P3040/W/17/3185493 – Land north of Asher Lane, Ruddington, Rushcliffe

CD6.6 APP/B1930/W/20/3265925 – Land off Bullens Green Lane, Colney Heath, St Albans / Welwyn Hatfield

CD6.7 APP/X1925/W/21/3273701 – Land south of Heath Lane, Codicote, North Hertfordshire

CD7 Relevant Judgements

CD7.1 Wychavon DC v Secretary of State for Communities and Local Government and Butler (2008) EWCA Civ 692

CD8 Other Documents

Documents relating to National Planning Policy:

CD8.1 National Planning Policy Framework (NPPF) (2021)

CD8.2 Planning Practice Guidance (PPG) Housing Supply and Delivery (2019)

CD8.3 Written Ministerial Statement 6 December 2022 - Update on the Levelling up Bill

CD8.4 Levelling-up and Regeneration Bill - Consultation on reforms to national planning policy (2022)

CD8.5 National Planning Policy Framework (NPPF) - Showing Proposed Changes (2022)

Documents relating to Local Planning Policy:

CD8.6 TDC Planning Policy Committee Paper 22 September 2022

CD8.7 TDC Housing Delivery Test Action Plan & Interim Policy Statement for Housing Delivery (September 2022)

CD8.8 TDC Planning Policy Committee Paper 19 January 2023

CD8.9 TDC Planning Policy Committee Paper 19 January 2023 - Addendum

Housing Need, Delivery and Supply:

CD8.10 The Objectively Assessed Housing Needs (OAN) of Tandridge (September 2018)

CD8.11 SHMA Affordable Housing Needs Assessment Update (June 2018)

CD8.12 TDC Authority Monitoring Report 2021-2022

CD8.13 TDC Authority Monitoring Report 2020-2021

CD8.14 TDC Authority Monitoring Report 2019-2020

Green Belt and Landscape:

CD8.15 Green Belt Assessment (Part 1) (December 2015)

CD8.16 Green Belt Assessment (Part 1) Appendix D Parcel Assessments (2015)

CD8.17 Green Belt Assessment (Part 2) Areas for Further Investigation (2016)

CD8.18 Green Belt Assessment (Part 2) Areas for Further Investigation (2016) Appendix 1

CD8.19 Green Belt Assessment (Part 2) Areas for Further Investigation (2016) Appendix 2 Extract

CD8.20 Green Belt Assessment (Part 3) Exceptional Circumstances and Insetting (June 2018)

CD8.21 Green Belt Assessment (Part 3) Appendix 1 (2018) - Extracts

CD8.22 Tandridge Landscape Capacity and Sensitivity Study Addendum (April 2017) Extract

CD8.23 Surrey Landscape Character Assessment - Tandridge Character Area (2015)

Proofs of Evidence:

- CD8.24 Local Planning Authority's Summary of Proof of Evidence
- CD8.25 Local Planning Authority's Proof of Evidence
- CD8.26 Appellant's Summary Proof of Evidence of Martin Taylor
- CD8.27 Appellant's Proof of Evidence of Martin Taylor
- CD8.28 Appellant's Proof of Evidence of Martin Taylor - Appendices
- CD8.29 Appellant's Landscape Proof of Evidence of Andrew Cook
- CD8.30 Appellant's Landscape Proof of Evidence of Andrew Cook - Appendices List
- CD8.31 Appellant's Landscape Proof of Evidence of Andrew Cook – Appendix 1
- CD8.32 Appellant's Landscape Proof of Evidence of Andrew Cook – Appendix 2
- CD8.33 Appellant's Landscape Proof of Evidence of Andrew Cook – Appendix 3
- CD8.34 Appellant's Landscape Proof of Evidence of Andrew Cook – Appendix 4
- CD8.35 Appellant's Landscape Proof of Evidence of Andrew Cook – Appendix 5
- CD8.36 Appellant's Landscape Proof of Evidence of Andrew Cook – Appendix 6
- CD8.37 Appellant's Landscape Proof of Evidence of Andrew Cook – Appendix 7
- CD8.38 Appellant's Rebuttal Proof of Evidence of Martin Taylor

Statement of Common Ground:

- CD8.39 Statement of Common Ground

Other Documents:

- CD8.40 Inspectors Note 23 of Examination of the Mole Valley Local Plan 2020-2037

CD9 Appeal documents received after the Inquiry opened

- CD9.1 Tandridge Planning Policy Committee Draft Minutes (19 January 2023)
- CD9.2 Cllr Robin Bloore Statement
- CD9.3 Appellant Opening Statement
- CD9.4 Council Opening Statement
- CD9.5 Save Warlingham Green Belt Group Statement
- CD9.6 Sports England email 28 February 2023
- CD9.7 Council Closing Statement
- CD9.8 Appellant Closing Statement

Schedule of Conditions

- 1) The development hereby permitted shall be begun before the expiration of three years from the date of this decision.
- 2) The development hereby permitted shall be carried out in accordance with the following approved plans, subject to other plans approved pursuant to other conditions herein under:

DRAWING	REFERENCE	DATED
Site Location Plan	170526/LP	17/12/2021
Site Layout	170526/SL/PL Rev V	02/08/2022
Overall Site Layout	170526/OSL/PL Rev B	02/08/2022
Coloured Site Layout	170526/CSL/PL Rev N	02/08/2022
Overall Coloured Site Layout	170526/OCSL/PL Rev D	02/08/2022
Site Layout – Sports Pitches	170526/SL/PL/SP Rev P	15/08/2022
Sports Pavilion Plan	170526/SP/EP Rev H	15/08/2022
Dwelling Types (Housing Mix) Plan	170526/SL/PL/DT Rev C	02/08/2022
Storey Heights Plan	170526/SL/PL/SH Rev C	02/08/2022
Tenure Plan	170526/SL/PL/TP Rev E	02/08/2022
Parking Plan	170526/SL/PL/PP Rev E	02/08/2022
Refuse Plan	170526/SL/PL/RP Rev C	02/08/2022
Materials Plan	170526/SL/PL/MP Rev C	02/08/2022
Fire Strategy Plan	170526/SL/PL/FS Rev C	02/08/2022
Enclosure (Boundary Treatments) Plan	170526/SL/PL/EP Rev C	02/08/2022
Substation Plan – Elevations and Floorplans	170526/AB/SS/EP Rev A	14/12/2021
Cycle Store Plan – Elevations and Floorplans	170526/AB/CS/EP Rev A	14/12/2021
Bin Store Plan – Elevations and Floorplans	170526/AB/BES/EP Rev A	14/12/2021
Bin and Cycle Store Plan – Elevations and Floorplans	170526/AB/BCS/EP Rev A	14/12/2021
Affordable Flats – 1B – Elevations and Floorplans	170526/HT/1B-FLATS/EP Rev C	25/03/2022
Affordable Flats – 1B & 2B – Elevations and Floorplans	170526/HT/FLATS/EP Rev D	25/03/2022
Affordable Flats 1 – 1B & 2B – Elevations and Floorplans	170526/HT/FLATS-1/EP Rev C	25/03/2022
Alder – Elevations and Floorplans	170526/HT/ALD/EP Rev C	14/12/2021
Arum – Elevations and Floorplans	170526/HT/ARU/EP	25/03/2022
Bayberry – Elevations and Floorplans	170526/HT/BAY/EP Rev C	14/12/2021
Bellflower – Elevations and	170526/HT/BEL/EP Rev C	25/03/2022

DRAWING	REFERENCE	DATED
Floorplans		
Blackthorn – Elevations and Floorplans	170526/HT/BLA/EP Rev C	14/12/2021
Chestnut – Elevations and Floorplans	170526/HT/CHE/EP Rev C	14/12/2021
Clover – Elevations and Floorplans	170526/HT/CLO/EP	25/03/2022
Fir – Elevations and Floorplans	170526/HT/FIR/EP Rev B	14/12/2021
Fir 2 – Elevations and Floorplans	170526/HT/FIR2/EP Rev B	14/12/2021
Gardenia – Elevations and Floorplans	170526/HT/GAR/EP	25/03/2022
Larch – Elevations and Floorplans	170526/HT/LAR/EP Rev C	14/12/2021
Rowan – Elevations and Floorplans	170526/HT/ROW/EP Rev B	14/12/2021
Walnut – Elevations and Floorplans	170526/HT/WAL/EP Rev B	14/12/2021
Whitebeam – Elevations and Floorplans	170526/HT/WHI/EP Rev D	14/12/2021
Willow – Elevations and Floorplans	170526/HT/WIL/EP Rev B	14/12/2021
Bungalow Side Gable – Elevations and Floorplans	170526/HT/1BB/SG/EP Rev B	14/12/2021
Bungalow Front Gable – Elevations and Floorplans	170526/HT/1BB/FG/EP Rev B	14/12/2021
Single Garage 1 – Elevations and Floorplans	170526/AB/SG1/EP Rev A	14/12/2021
Single Garage 2 – Elevations and Floorplans	170526/AB/SG2/EP Rev B	13/01/2022
Double Garage 1 – Elevations and Floorplans	170526/AB/DG1/EP Rev A	14/12/2021
Double Garage 2 – Elevations and Floorplans	170526/AB/DG2/EP Rev A	14/12/2021
Tree Protection Plan	19020-3	-
Illustrative Masterplan (Landscape)	DLA-2072-L-11-P03	10/08/2022
Hard Landscape Plan – Sheet 1 of 5	DLA-2072-L-01-P02	09/08/2022
Hard Landscape Plan – Sheet 2 of 5	DLA-2072-L-02-P02	09/08/2022
Hard Landscape Plan – Sheet 3 of 5	DLA-2072-L-03-P02	09/08/2022
Hard Landscape Plan – Sheet 4 of 5	DLA-2072-L-04-P02	09/08/2022
Hard Landscape Plan – Sheet 5 of 5	DLA-2072-L-05-P02	09/08/2022

DRAWING	REFERENCE	DATED
Soft Landscape Plan – Sheet 1 of 5	DLA-2072-L-06-P03	09/08/2022
Soft Landscape Plan – Sheet 2 of 5	DLA-2072-L-07-P03	09/08/2022
Soft Landscape Plan – Sheet 3 of 5	DLA-2072-L-08-P03	09/08/2022
Soft Landscape Plan – Sheet 4 of 5	DLA-2072-L-09-P04	25/08/2022
Soft Landscape Plan – Sheet 5 of 5	DLA-2072-L-10-P04	25/08/2022
Indicative Site Construction Access Plan	170526/SL/PL/MPAC	-
Proposed Highway Arrangements Plan	170523-09 Rev C	-
Proposed Highway Arrangements Plan	170523-10 Rev B	-
Proposed Access Arrangements Plan	170523-01 Rev C	-

- 3) Prior to any above ground works (excluding demolition) details of the materials to be used in the construction of the external surfaces of the buildings and dwelling hereby permitted have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with these approved details.
- 4) A) Prior to the commencement of facade works, detailed drawings/plan/section/elevation at 1:20 of the following shall be submitted to the Local Planning Authority for approval in writing:
 - Typical window (reveal, header, sill);
 - Communal entrances;
 - Typical Balcony/balustrade; and
 - Parapets.
 B) The development shall only be implemented in accordance with the details approved under part A) above.
- 5) No development shall start in relation to the construction of the dwellings until details of the levels of accesses and finished floor levels of the building(s) hereby approved have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with these approved details.
- 6) Notwithstanding the details already submitted, no development shall start until full details of both hard and soft landscape works have been submitted to and approved in writing by the Local Planning Authority. These works shall be carried out as approved. These details shall include:
 - a. proposed finished levels or contours
 - b. means of enclosure

- c. car parking layouts
- d. other vehicle and pedestrian access and circulation areas
- e. hard surfacing materials
- f. minor artefacts and structures (e.g. furniture, play equipment, refuse or other storage units, signs, lighting etc.).

Details of soft landscape works shall include all proposed and retained trees, hedges and shrubs; ground preparation, planting specifications and ongoing maintenance, together with details of areas to be grass seeded or turfed. Planting schedules shall include details of species, plant sizes and proposed numbers/densities.

All new planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding season following the completion or occupation of any part of the development (whichever is the sooner) or otherwise in accordance with a programme to be agreed. Any trees or plants (including those retained as part of the development) which within a period of 5 years from the completion of the development die, are removed, or, in the opinion of the Local Planning Authority, become seriously damaged or diseased shall be replaced in the next planting season with others of the same size and species, unless the Local Planning Authority gives written consent to any variation. The hard landscape works shall be carried out prior to the occupation of the development.

- 7) Prior to the construction of the play areas hereby approved, a scheme detailing the play equipment, boundary treatment and ground surface area treatment of the outdoor play spaces shall be submitted to the Local Planning Authority and approved in writing. The play equipment will be designed to be fully inclusive to ensure the areas are accessible to all and will be implemented upon occupation of the relevant part of the development in accordance with the approved plans, to be retained permanently thereafter.
- 8) Notwithstanding the details already submitted, no development shall start until a detailed Tree Protection Plan and Arboricultural Method Statement, in full accordance with sections 5.5 and 6.1 of BS5837:2012 Trees in relation to design, demolition and construction - Recommendations [appropriate and specific to the approved scheme], to include details of the protection of all retained trees from works associated with demolition, construction and landscaping, and all works within the root protection area, or crown spread [whichever is greater], of any retained tree, has been submitted to and agreed in writing by the Local Planning Authority. These details shall include a system of arboricultural supervision and monitoring where works within root protection areas are required. Thereafter, all works shall be carried out and constructed in accordance with the approved details and shall not be varied without the written consent of the Local Planning Authority.
- 9) No trees or hedges shall be pruned, felled or uprooted during site preparation, demolition, construction and landscaping works [except as shown on the documents and plans hereby approved] without the prior written consent of the Local Planning Authority. Any retained trees or hedges which are removed, or which within a period of 5 years from the

completion of the development die are removed, or, in the opinion of the Local Planning Authority, are dying, becoming diseased or damaged shall be replaced by plants of such size and species as may be agreed in writing with the Local Planning Authority.

- 10) Prior to the commencement of development the applicant should submit to the Local Planning Authority for approval a Landscape and Ecological Management Plan (LEMP) to details the management measures required to deliver the biodiversity net gain identified in the biodiversity net gain assessment. The LEMP should include, but not be limited to following:
 - a. Description and evaluation of features to be managed including the public rights of way and adjacent hedgerows
 - b. Ecological trends and constraints on site that might influence management
 - c. Aims and objectives of management including any new Green Belt boundaries
 - d. Appropriate management options for achieving aims and objectives
 - e. Prescriptions for management actions, together with a plan of management compartments
 - f. Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period
 - g. Details of the body or organisation responsible for implementation of the plan
 - h. Ongoing monitoring and remedial measures
 - i. Legal and funding mechanisms by which the long-term implementation of the plan will be secured by the applicant with the management body(ies) responsible for its delivery
 - j. Monitoring strategy, including details of how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme.
 - k. Invertebrate Habitat Enhancement Plan
 - l. Ecological Enhancement Plan
- 11) Prior to the commencement of the development an updated badger survey of the proposed development site should be carried out. If potential evidence of a badger sett is recorded, then the Applicant should submit a Badger Mitigation Strategy to the Local Planning Authority for approval. Thereafter the development shall be undertaken in accordance with the approved Badger Mitigation Strategy.
- 12) Prior to commencement of development a reptile mitigation strategy should be submitted to and approved in writing by the Local Planning Authority. The strategy should be prepared by a suitably qualified ecologist and appropriate to the local context. The reptile mitigation strategy should include, but not be limited to following:
 - a. Location and map of the proposed translocation site

- b. Assessment of the habitats present, including their ecological function to reptiles
 - c. Assessment of the translocation site reptile population size, evidenced by recent reptile surveys following best practice, and an assessment of habitat quality
 - d. Analysis of reptile carrying capacity of translocation site
 - e. Details of management measures that are required
 - f. Work schedule (including an annual work plan capable of being rolled forward over a five-year period)
 - g. Details of the body or organisation responsible for implementation of the reptile mitigation strategy
 - h. Ongoing monitoring and remedial measures
 - i. Legal and funding mechanisms by which the long-term implementation of the reptile mitigation strategy will be secured by the applicant with the management body(ies) responsible for its delivery.
- 13) Prior to commencement of development a Sensitive Light Management Plan shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be undertaken in accordance with these details.
- 14) No development shall commence until a revised Construction Transport Management Plan is submitted to include details of:
- a. parking for vehicles of site personnel, operatives and visitors
 - b. loading and unloading of plant and materials
 - c. storage of plant and materials
 - d. programme of works (including measures for traffic management)
 - e. HGV deliveries and hours of operation
 - f. vehicle routing
 - g. measures to prevent the deposit of materials on the highway
 - h. on-site turning for construction vehicles
 - i. provision of boundary hoarding behind any visibility zones
- has been submitted and approved in writing by the Local Planning Authority. Only the approved details shall be implemented during the construction of the development.
- 15) Prior to the commencement of development the applicant should submit to the Local Planning Authority for approval a Construction Environmental Management Plan (CEMP). The CEMP should include, but not be limited to:
- a. Map showing the location of all of the ecological features
 - b. Risk assessment of the potentially damaging construction activities
 - c. Practical measures to avoid and reduce impacts during construction
 - d. Location and timing of works to avoid harm to biodiversity features

- e. Responsible persons and lines of communication
- f. Use of protected fences, exclusion barriers and warning signs.

Thereafter the development shall be undertaken in strict accordance with the approved CEMP.

- 16) Piling, deep foundations or other intrusive groundworks (investigation boreholes/tunnel shafts/ground source heating and cooling systems) using penetrative methods shall not be carried out other than with the written consent of the Local Planning Authority. The development shall be carried out in accordance with the approved details.
- 17) The development hereby permitted shall not commence until details of the design of a surface water drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The design must satisfy the Sustainable Urban Drainage System (SuDS) Hierarchy and be compliant with the national Non-Statutory Technical Standards for SuDS, National Planning Policy Framework and Ministerial Statement on SuDS. The required drainage details shall include:
 - a. Evidence that the proposed final solution will effectively manage the 1 in 30 & 1 in 100 (+40% allowance for climate change) storm events and 10% allowance for urban creep, during all stages of the development. The final solution should follow the principles set out in the approved drainage strategy.
 - b. Detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.).
 - c. A plan showing exceedance flows (i.e. during rainfall greater than design events or during blockage) and how property on and off site will be protected from increased flood risk.
 - d. Details of drainage management responsibilities and maintenance regimes for the drainage system.
 - e. Details of how the drainage system will be protected during construction and how runoff (including any pollutants) from the development site will be managed before the drainage system is operational.
- 18) Prior to the first occupation of the development, a verification report carried out by a qualified drainage engineer must be submitted to and approved by the Local Planning Authority. This must demonstrate that the surface water drainage system has been constructed as per the agreed scheme (or detail any minor variations), provide the details of any management company and state the national grid reference of any key drainage elements (surface water attenuation devices/areas, flow restriction devices and outfalls), and confirm any defects have been rectified.
- 19) No part of the development shall be commenced until the proposed vehicular / pedestrian access to Limpsfield Road has been constructed and provided with visibility zones in accordance with the Access Arrangements Plan drawing no. 170523-01 Rev C and thereafter the

- visibility zones shall be kept permanently clear of any obstruction between 0.6m and 2.0m above ground level.
- 20) Prior to the occupation of each dwelling hereby approved space shall be laid out within the site for each of the residential dwellings in accordance with the approved plans for vehicles to be parked and for vehicles to turn so that they may enter and leave the site in forward gear. Thereafter the parking/turning areas shall be retained and maintained for their designated purposes.
 - 21) The development hereby approved shall not be first occupied until space has been laid out within the site for the sports facility in accordance with the approved plans for 100 vehicles (including 5 disabled bays) and 3 coach spaces to be parked and for vehicles to turn so that they may enter and leave the site in forward gear. Thereafter the parking/turning areas shall be retained and maintained for their designated purposes.
 - 22) The residential development hereby approved shall not be first occupied until facilities for the secure, covered parking of bicycles and the provision of a charging point for e-bikes next to the facilities have been provided within the development site in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority and thereafter the said facilities shall be provided, retained and maintained to the satisfaction of the Local Planning Authority.
 - 23) The sports facility hereby approved shall not be first occupied until facilities for the secure, covered parking of 40 bicycles and the provision of a charging point for e-bikes next to the facilities have been provided within the development site in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority and thereafter the said facilities shall be provided, retained and maintained to the satisfaction of the Local Planning Authority.
 - 24) A revised Travel Plan shall be provided and approved in writing with the Local Planning Authority and thereafter implemented prior to first occupation and each and every subsequent occupation of the development, thereafter maintain and develop the Travel Plan to the satisfaction of the Local Planning Authority.
 - 25) The development hereby approved shall not be first occupied until at least 1 car club vehicle has been provided for occupiers to use in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority. Thereafter the club vehicle/s shall be retained and maintained for their designated purpose.
 - 26) Prior to first occupation the following package of measures shall be implemented at the applicants expense through a S278 Agreement in general accordance with the Highway Arrangements Plan drawing no.170523-09 Rev C.
 - a. Design and provision of a toucan crossing including facilities for cyclists to join the carriageway, dropped crossings and tactile paving and all associated costs (legal order, advertisement consents, signals design and installation), civil engineering and traffic management works, commuted sums for future maintenance.

- b. Two vehicle activated speed signs (VAS) to be constructed on Limpsfield Road at the applicants expense with the location to be agreed with the Highway Authority.
 - c. Widening of the existing footpath from the proposed site access towards Warlingham Village centre to 2m where this can be achieved.
 - d. The existing footway from the pedestrian/emergency access (between 176 and 178 Limpsfield Road) to be widened to 3m as far as the proposed site access to provide a shared pedestrian/cycleway.
 - e. Provision of pedestrian refuge island with dropped kerbs and tactile paving
 - f. Provision of tactile paving across Crewes Avenue and Crewes Lane.
 - g. Relocation of existing bus stop which is currently adjacent Verdayne Gardens.
 - h. The relocated bus stop and the stop outside 182 Limpsfield Road will be subject to the following improvements:
 - i. raised kerbing of 140mm for approximately 9m subject to site conditions and location to be agreed with Surrey County Council's (SCC's) Passenger Transport Projects Group.
 - ii. bus cage markings and bus stop clearway
 - iii. investigation as to whether bus shelters can be provided, then the shelter, style and location to be agreed with the SCC's Passenger Transport Projects Team and provided with lighting and seating with arm rests.
 - iv. bus flag and pole
 - v. Real Time Passenger Information (RTPI)
- 27) The residential development hereby approved shall not be occupied until each of the proposed dwellings are provided with a fast-charge Electric Vehicle charging point (current minimum requirements - 7 kw Mode 3 with Type 2 connector - 230v AC 32 Amp single phase dedicated supply) in accordance with a scheme to be submitted and approved in writing by the Local Planning Authority and thereafter retained and maintained to the satisfaction of the Local Planning Authority.
- 28) The sports facility hereby approved shall not be occupied until 20 of the available parking spaces have been fitted with a fast charge Electric Vehicle charging point (current minimum requirements - 7 kw Mode 3 with Type 2 connector - 230v AC 32 Amp single phase dedicated supply) plus a further 20 spaces to be provided with a power supply to provide additional fast charge socket (Feeder pillar or equivalent premising future connection 230v AC 32 Amp single phase dedicated supply).
- 29) Prior to the occupation of each dwelling hereby approved the solar thermal systems and solar photovoltaic modules as specified in the application details shall be installed in relation to that dwelling and this system shall thereafter be retained in perpetuity in accordance with the approved details.
- 30) Prior to the commencement of the development hereby permitted, a scheme and phasing plan for the relocation and reprovision of the playing

pitches, pavilion and ancillary facilities hereby permitted shall be submitted to the Local Planning Authority for approval, in consultation with Sport England.

This scheme and phasing plan should ensure that on the existing John Fisher Sports Club site a minimum of three playing pitches (of which at least one should be 11 v 11 sized), the existing pavilion and car parking facilities are available and accessible for safe and continual use until the new playing field area containing the Over 18 (Senior) 11 v 11, Youth U15/U16 11 v 11 and Youth U13/14 11 v 11 playing pitches, which shall all include the appropriate 3m run-off areas, the pavilion and ancillary facilities hereby permitted as set out in drawing numbers 170526/SL/PL/SP rev P and 170526/SP/EP Rev H and the Sport Turf Consulting report dated 1st July 2022 are constructed and available for use. The playing field, pavilion and ancillary facilities shall be maintained, available for use and accessible in accordance with the approved details.

On the completion of the 50th dwelling, the playing field area containing the Youth U13/14 11 v 11 and both Mini-Soccer U9/U10 7 v 7 playing pitches hereby permitted shall be constructed and be available for use as set out in drawing numbers 170526/SL/PL/SP rev P and 170526/SP/EP Rev H and the Sport Turf Consulting Report dated 1st July 2022. The playing field shall be maintained, available for use and accessible in accordance with the approved details.