

Pre-application Enquiry Response

Our Reference:	PA/2022/139
Development Address:	Land to the south of Kenley Aerodrome, Kenley
Description of Development:	Residential Development
Agent/Applicant:	Daniel Watney

Relevant Planning history		
Reference:	Description of Development	Decision/Date
	NONE RELEVANT TO THIS PROPOSAL	

Site Constraints	
Designations:	Green Belt

Relevant Planning Policies/Guidance	
Tandridge District Local Plan – Part 2: Detailed Policies (2014)	DP1, DP4, DP5, DP7, DP9, DP10, DP13, DP18, DP19, DP20, DP21, DP22
Tandridge District Core Strategy (2008)	CSP1, CSP2, CSP3, CSP7, CSP11, CSP12, CSP13, CSP14, CSP15, CSP17, CSP18, CSP19, CSP21, CSP22
Woldingham Neighbourhood Plan (2016)	Not Relevant
Limpsfield Neighbourhood Plan (2019)	Not Relevant
Caterham, Chaldon & Whyteleafe Neighbourhood Plan (Reg.18, 2020)	Not Relevant
National Planning Policy Framework	NPPF 2021 and associated Planning Practice Guidance

Supplementary Guidance:	<p>Tandridge Parking Standards</p> <p>Surrey Vehicular and Cycle Parking Guidance</p> <p>Kenley Aerodrome Conservation Area Position Statement</p> <p>Trees and Soft Landscaping SPD.</p>
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Planning Assessment	
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Preamble	<p>The site forms the southern part of the former Kenley Aerodrome, that part which falls within Tandridge District. It comprises an area to the north of the former NAFFI building (now occupied by The One School). This is partly overgrown and contains the remains of a former workshop and other hard surfaces. A strip of land to the east of the eastern roadway is also included.</p> <p>The school building itself occupies a central portion of the land together with the open area to the south, the former parade ground. This element is excluded from the site area.</p> <p>A further undeveloped area to the south of the parade ground is used as a playing field by the school (more on this matter is discussed below) also forms part of the site under consideration. Land to the west of Victor Beamish Avenue is also included.</p>
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Emerging Local Plan	<p>The site was identified in the draft emerging plan as a site suitable for housing but subject to a number of matters which remain to be resolved. The status of the emerging plan, and therefore the status of the allocation, requires consideration.</p> <p>On matters of principle the Inspector’s preliminary findings, ID16, raise significant concerns over the soundness of the plan for a number of reasons. There is concern over the size of the OAN figure (398dpa in the emerging plan) and the housing delivery targets that the plan seeks to deliver. There are infrastructure-based concerns over the ability of the District’s infrastructure to accommodate the level of growth to be delivered, in particular the capacity of j6 of the M25. There are also concerns over the spatial strategy which involves the development of a garden village. A number of concerns on some of the site allocations were identified and this site is included as raising issues of concern in the Inspector’s report.</p> <p>The emerging plan has been ‘stalled’ since 2019 awaiting further work on the main issues to be resolved with the Inspector issuing guidance on the way forward. He considered that the LPA could withdraw the plan or that further work be carried out to resolve the issues. The extent of further work is substantial and there is no guarantee that, once completed, the Inspector would find the plan sound. There is also concern that the work may not be completed</p>
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	<p>in time for adoption under the interim measures, namely December 2023.</p> <p>The Council is continuing with some work to resolve the transport related issues but is placing on hold other work awaiting a response to matters raised in the letter from Greig Clark to PINS. Matters relating to the potential adoption of the emerging plan, or its withdrawal mean that there is little prospect of the plan being adopted in the short term.</p> <p>Its effect is that I can place little weight to the policies of the plan or the draft allocations and must determine proposals based on the adopted plan and the NPPF 2021.</p> <p>The status of the current local plan which was adopted in 2008 means that it is dated. I can continue to give appropriate weight to those policies which accord or partially accord with the NPPF. However, on the matter of housing I accept that the policies are dated, and I must rely largely on the NPPF for guidance.</p> <p>On the issue of the draft allocation, I am mindful that it has been the subject of examination and I should give weight (as a material consideration) to it dependant on the degree of support/objection given to the allocation. I will consider this issue in the next section.</p>
Principle of Development	<p>The site lies outside the defined settlement boundary of Caterham although the site area does border the settlement boundary to the west and the south. Whilst a development in this location would normally be considered to be in an unsustainable location and contrary to CSP1 and DP1 of the adopted plan there are a number of factors that lead me to conclude that a development in this location would be sustainable. Firstly, the site is within easy walking distance of nearby bus stops in Salmons Lane West and Salmons Lane. It is also within 1.2km of the nearest railway station and has direct links to the roads and well-lit pavements linking the site to other parts of the town. I therefore consider that there are a range of modes of travel available and that the site is in a sustainable location. Whilst this is only one part of the sustainability argument it is nevertheless an important factor.</p> <p>I also consider that the site is in accordance with CSP1. This sets out the spatial strategy of the Council locating development at towns and major villages in the District. I am mindful that paragraph 6.2 states <i>“if it is not possible to allocate sufficient land without encroaching into the Green Belt, growth will be directed to land immediately adjoining built up areas, i.e. which are within the Green Belt.”</i></p> <p>Given the dated housing growth targets in the plan and the level of housing needs in the district, significant weight should be given to investigating the release of land in sustainable locations</p>

	<p>outside urban and village confines to satisfy housing needs. This is heightened by the lack of available 'brownfield' sites within urban areas to satisfy housing growth needs.</p> <p>I accept that the LPA must now consider the development of land in the green belt to provide sufficient housing and a large part of the Council's emerging housing strategy acknowledges this with green belt allocations. The housing section concludes that there is an exceptional need the extent of which is sufficient justification for considering the release of green belt land.</p> <p>Although a draft allocation in the emerging plan, I note there were objections to the allocation and as a result of these I give more limited weight to the draft allocation as a material consideration than I would otherwise have done. It does not however affect the principle of examining the suitability of the site for meeting housing needs.</p>
Green Belt	<p>The site is located in the Green Belt. The adopted plan's policies towards green belt development accord with national policies in the NPPF and therefore continue to carry weight in spite of the dated nature of some other policies of the plan itself. Policy DP10 states that within the Green Belt, planning permission for any inappropriate development which is, by definition, harmful to the Green Belt, will normally be refused. Proposals involving inappropriate development in the Green Belt will only be permitted where very special circumstances exist, to the extent that other considerations clearly outweigh any potential harm to the openness of the Green Belt.</p> <p>Policy DP13 considers exceptions to development in the countryside within green belt areas. Housing use does not fall within one of the exceptions categories. However, it does identify the potential for partial or complete redevelopment of previously developed sites in the Green Belt (outside the Defined Villages) provided that the proposal would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.</p> <p>This site can be defined as previously developed land. However, its current appearance is one of general openness with few structures within the site except for the ruined workshop. Whilst there are areas of hard surfacing, my opinion is that many parts of the site shows extensive signs of returning to nature with areas of sapling and weed growth.</p> <p>The residential development proposed therefore constitutes inappropriate development in the Green Belt by definition, with significant harm to its openness. The site's green belt designation has, in the past, proved effective in meeting the aims of green belt designation (in NPPF) over time, in particular;</p>

- a) checking the unrestricted sprawl of large built-up areas;
- b) preventing neighbouring towns merging into one another.
- c) assisting in safeguarding the countryside from encroachment.

Substantial weight must be given to the harm caused and, development should not be approved except in very special circumstances, where the benefits must clearly outweigh the harm to the Green Belt and any other identified harm. Whether very special circumstances exist is considered later but an assessment on green belt openness is made here.

As part of the emerging Local Plan the Council has undertaken a Green Belt Assessment which includes a strategic and local assessment. The site falls within Strategic Area A, which has played a strong role in containing the urban conurbation of London and the large built-up areas in the District and outside.

A more detailed assessment was made of GBA004 which included that site. The parcel was noted as undergoing quite a substantial change since the Green Belt was first designated. The De Stafford School and Kenley Aerodrome have both been developed over the years with additional housing to the west of the former NAFFI building. It also concluded that the parcel does have a significant role in preserving the setting of the Kenley Conservation Area as the Conservation Area is bordered on all three sides within Tandridge by development.

However, whilst this assessment was used, in part, to justify the allocation of the site and amendment to the green belt boundary, I can give this little weight in the current assessment as the green belt designation will remain in place until such time as a new Local Plan is adopted with the site's housing designation confirmed.

It is therefore necessary to establish the extent of potential harm to the green belt arising from this proposal

The effect of the proposed development will significantly reduce the openness experienced on the site. The southern part of the site remains largely undeveloped with a large area of grassland used by the school surrounded by extensive tree belts to the east and west. Proposals for this area provide housing spread across the site, in some cases significantly affecting tree cover (on the west side of Victor Beamish Avenue), with small areas of open space within the layout. The spread of buildings and garden areas will significantly harm the openness, both spatially and visually.

To the north of the NAFFI building development is shown to extend across the whole of the site with areas of linked open

	<p>space to provide a vista from the NAFFI building to the airfield. Whilst there is some development on the site, in the form of the remains of the workshop I again consider that there will be both spatial and visual harm to the openness of the site.</p> <p>The NPPF is clear that in these circumstances, I must give substantial weight to the harm caused.</p> <p>Nevertheless, the development does have defensible boundaries in the form of the existing tree cover surrounding the site which means that the extent of harm to openness will be limited to the local area.</p> <p>I consider that the development will not impact on the openness of the wider Green Belt area. Nor do I consider that the development will significantly erode the open countryside between Kenley (in the London Borough of Bromley) and Caterham especially as there are extensive protection measures in place for the main airfield. Therefore, one of the primary functions of the green belt designation is not significantly prejudiced.</p> <p>I do have concerns over the potential impact of the development on the designated conservation area and this is examined in more detail later. I note that one of the functions of green belt designation is to preserve the setting and special character of historic towns. This site is not within or adjacent to a historic town but is an integral part of a largely complete heritage asset.</p> <p>I note that the draft allocation was made without any statement of significance of the heritage asset or assessment of the heritage impact. To my mind these are essential considerations before any allocation of the site or parts of the site for development can be made.</p> <p>Any development of the site will have an impact on the heritage asset and I therefore conclude that the proposed development would prejudice this objective of green belt designation.</p>
Character and Appearance	<p>This land parcel was assessed in the Tandridge Landscape Capacity and Sensitivity Study which concluded that the visual sensitivity of the site was judged to be moderate and that it had a medium landscape capacity for housing development.</p> <p>This conclusion was reached on the basis that views into and out of the site are localised. Views from Salmon Lane are restricted by densely wooded boundaries. To the north there are filtered views in from Kenley Aerodrome and there are views from the west, from housing which overlooks the site on Rosebriars, Hillhurst Gardens and Collard Close. There are also open views from Victor Beamish Avenue and Salmons Lane West across the site.</p>

	<p>I have no reason to doubt these findings and consider that the development will have an adverse, but contained, impact on the existing character of the area which could in part be mitigated by further planting especially when considering the potential of strengthening the tree screen on the east side of the site. The development would be contrary to policies CSP18 and DP7.</p> <p>Development on the west side of Victor Beamish Avenue will, in my opinion, have a significant impact on the area's character with little opportunity for mitigating planting with a similar impact from the development of the northern area between the former NAFFI building and the main aerodrome site.</p> <p>I consider that the development of the southern portion of the site, the playing field area, will have a very significant impact on the overall character of the area and that of the conservation area. However, I am mindful that the case could be made that these adverse impacts are outweighed by the need for additional housing in the district.</p> <p>Notwithstanding all of the above, the proposal is currently contrary to policy CSP21 which seeks to protect the character and distinctiveness of the District's landscapes and countryside for their own sake, with new development required to conserve and enhance landscape character. In my opinion this layout does not protect or enhance landscape character. Only exceptional circumstances could outweigh the potential adverse impact on the countryside in these circumstances.</p> <p>I had considered that policy CSP21 was not up to date and not in accordance with national policy. Therefore, I had considered that only limited weight could be given to it in an overall assessment of the planning balance. However, a recent appeal decision commented that, <i>"the principles of Policy CSP 20, insofar as relevant to the proposals, and Policy CSP 21 are broadly consistent with the Framework's policies on landscape and character"</i>. In the light of this I assign weight to its objectives.</p> <p>The policy does go on to say that new development will be required to conserve and enhance landscape character, so it does not prevent development altogether, simply that proposals should conserve and enhance the landscape. As stated above this proposal does not do that.</p> <p>I will consider master planning issues separately.</p>
Housing Provision	<p>The proposal would result in a net gain of 88 dwellings on the site and assist the council in meeting its housing needs in accordance with CSP2 and consistent with the principles of sustainable development. Furthermore, the site comprises previously developed land located on the edge of a Tier 1 settlement and as</p>

	<p>such is in a preferred location on sustainability grounds, being within close proximity to a range of facilities.</p> <p>The housing policies of the Local Plan are not up to date. Whilst the tilted balance set out in para 11 of the NPPF does not apply due to the protected status of the land, it is acknowledged that the Council does not have a 5-year housing land supply. Further, it cannot meet the requirements of the housing delivery test. This becomes a material consideration which carries weight in any assessment of the proposal. I consider the shortfall to be so acute as to constitute exceptional circumstances.</p> <p>The traditional stance of the Council is that it considers housing need, on its own, is insufficient justification to release green belt land for development and applicants will need to examine a range of other factors for the Council to consider that a very special circumstances case is made.</p> <p>Having considered (i) the acuteness/intensity of the objectively assessed need for housing, (ii) the inherent constraints on supply/availability of land suitable for sustainable development and (iii) the consequent difficulties in achieving sustainable development without impinging on the Green Belt it is evident that development within the Green Belt is necessary if Tandridge is to meet its future housing needs and that this need is sufficient to be considered a potential very special circumstance to which significant weight must be given. The NPPF objective of significantly boosting the supply of homes adds further weight to this argument which will be taken into account in the planning balance.</p> <p>The preliminary information on housing mix indicates that the proposal will deliver the following:</p> <p>Private ownership mix:</p> <ul style="list-style-type: none"> • 11 x 2 beds (21%) • 24 x 3 beds (46%) • 12 x 4 beds (23%) • 5 x 5 beds (10%) <p>This proposed mix is acceptable and largely follows the house type needs identified in the SHMAA. The development therefore accords with policy CSP7 if the development of the site is to be pursued.</p>
Affordable Housing	<p>I also consider that the potential delivery of affordable homes should be given significant weight.</p> <p>The proposed affordable homes mix of 6 x 2 beds and 30 x 3 beds is acceptable. The applicant should be mindful that the</p>

	<p>Council would not expect all the 3 beds to be together as this will lead to a housing management nightmare – clusters of 10 or so are preferred. The affordable element should be predominantly within houses rather than flats and no garages should be provided.</p> <p>Our housing section would be looking for 75% of the units to be affordable rent and 25% to be shared ownership. This mix will be different if First Homes apply at the point of application but at the moment they do not.</p> <p>In terms of unit sizes, the rented and shared ownership units should meet the NSS for a 2b4p flat/house and 3b5p flat/house.</p>
<p>The Playing Field</p>	<p>I previously referred to objections received on the allocation of this site for residential development. One of these was from Sport England to the loss of a playing field facility. The applicant has set out their position on the playing field in this submission which is as follows:</p> <ul style="list-style-type: none"> i) The playing pitch has never been used formally beyond being a kick-about area simply because it's there. ii) Sport England concede they are not a statutory consultee in this case. iii) The land does not form part of the school grounds iv) The parcel is included in the draft allocation and therefore an assessment has been made by the Council that the facility does not meet the criteria for protection. <p>In researching the planning history of the area, the applicant is correct that the school planning permission did not include the playing field. However, the school have used the pitch constantly for a playing pitch to the degree that I consider a change of use has occurred to educational use.</p> <p>This, on its own, is sufficient for TDC to consider the potential loss of playing facilities as a valid concern. It is also sufficient for the LPA to notify Sport England as a consultee in any planning application.</p> <p>Sport England response to the draft allocation is that although not forming a part of the school's premises they would object to the loss of playing facilities even though it is not publicly available.</p> <p>This raises the issue of relevance of policy CSP13. This states that sports facilities and services and open space will be safeguarded. However, the glossary definition specifically identifies facilities or services for the community, so the policy does not apply as the field is not used by the community.</p>

Policy DP18 states that proposals involving the loss of existing open space, sports and recreational buildings and land will generally be resisted and will only be found acceptable where they satisfy the requirements of paragraph 74 of the National Planning Policy Framework.

Para 74 requires the LPA to maintain a 5-year housing land supply, and this is one of the reasons why this site might be considered suitable for development in advance of the adoption of the emerging local plan. However, such a development must also comply with all the relevant planning policies and not just housing land provision and para 74 does not override these other considerations. It is on the planning balance that a view must be taken on the value to be attached to the loss of the playing field.

I also note in one of the submission documents that it is the aspiration of the One School to build a sports facility in proximity to the campus in due course. This scheme would seem to reduce this opportunity, which is a shame, when the proposed facility could be planned into your overall scheme.

I therefore have to consider the weight to be given to the Sport England objection as a consultee to any application. I should also consider what, if any, weight should be given to school's need for future playing facilities which appear to be prejudiced by this proposal.

In my opinion, TDC should treat the Sport England comments as one of the many consultee responses and consider the views with all the other matters in the planning balance.

I am mindful that TDC has not identified this space as either a sports facility or as an open space. Nor did it try to protect the area as a protected open space in the emerging plan. This suggests that it did not place great value on the grassed area (as a valued open space) which deserved long term protection. Therefore, I see no reason to protect the openness of this space except as part of the countryside and a part of the green belt or as a feature of value defining the character of the conservation area. [I examine the issue of the setting of the heritage asset and conservation area separately.]

I do note that a shortfall of parks and recreation grounds and youth play space is identified in Caterham on the Hill for which there are not specific proposals or draft allocations in the emerging plan or other policy documents. This factor should also be carefully considered in assessing the planning balance.

If the Council does consider the development of this part of the site as essential to satisfy its housing shortage, then consideration should be given to compensation to offset the loss of the existing pitch area which should be equivalent in terms of

	quantity/quality and will reflect any advice received from Sport England on appropriate requirements.
Residential Amenity	Any potential matters relating to residential amenity are dealt with in the masterplan section.
Landscaping and Trees	<p>There are a great many trees on the site and a tree survey has been provided. However, the proposed layout needs to be transposed on to the tree survey and an arboricultural impact assessment required. I can give limited arboricultural advice until these items have been provided.</p> <p>The main comments at this moment in time are as follows:</p> <ul style="list-style-type: none"> • The scheme layout does not appear to have been informed by the presence of trees on the site more it has been imposed. • The proposals appear to involve the unacceptable loss of trees on the site in a number of key positions • The landscape strategy does not provide sufficient detail to assess whether there is sufficient mitigating tree planting works <p>On the basis of a lack of sufficient information, I consider that the development is contrary to policy CSP18 and DP7.</p> <p>I have spoken to my tree officer who has indicated that he has not been contacted by the applicant to hold a site meeting and I consider that this is essential before any amendments to the development are made.</p>
Flooding and Drainage	The proposal will need to be accompanied by a flood risk and drainage assessment.
Highways, Parking Provision	I note that the applicant has undertaken pre application consultation with Surrey Highways which has identified a number of matters that will need to be resolved as part of any planning application. I have nothing further to add except that the Surrey Vehicular and Cycle Parking Guidance provides a more recent set of parking standards than the Tandridge Parking Standards and should be used in developing your layout.
Ecology	<p>No ecological information has been presented. The Council will expect any application to be accompanied by a Preliminary Ecological Appraisal and where identified, further detailed survey work.</p> <p>A biodiversity enhancement plan will also need to be produced and enhancement is to be measured by the use of biodiversity</p>

	<p>metric 3.1. The Council will expect the development to achieve at least a 10% enhancement to biodiversity.</p> <p>One concern that I have is the potential for human habitation close to biodiversity enhancement proposals to limit the biodiversity gains achievable and this is a matter that will need to be fully explored within supporting documentation accompanying any application.</p>
Heritage & Archaeology	<p>The site forms part of the much larger Kenley Aerodrome Conservation Area in which there are a number of listed buildings. One listed structure, the former NAFFI building, is located in the centre of the site under consideration but excluded from it. However, the site does form part of the setting of the listed building. Development therefore needs to consider the conservation area and heritage asset issues arising from the development.</p> <p>I note that the applicant has consulted Surrey's Senior Historic Buildings Officer on whom TDC will rely on for conservation and heritage advice. I also refer to the Statement of Common Ground as agreed between Tandridge District Council and the London Borough of Croydon Council in relation to the draft allocation and in particular to the plan in Appendix C referring to areas A, B, C and D.</p> <p>The applicant's statement of significance also provides some background information on the aerodrome, but the comments below are made without the benefit of a heritage impact assessment (which the Local Plan Inspector has requested to support the draft allocation) or a statement of Conservation Area Impact. These are therefore my initial views and I deal firstly with the impact of the development on the heritage asset.</p> <p><u>Heritage Asset</u></p> <p>The former NAFFI building and parade ground to the south forms a direct visual reminder of its links with the past use of the area in connection with the aerodrome. It therefore has an importance to the relative completeness of the aerodrome as a strategic WW2 air defence. Land around it, both to the north and south, assumes a similar importance and forms a setting to the listed building in the centre of the site.</p> <p>The statement of significance says that the former Institute is of medium to high significance. It is of greatest importance for its historical association with this noted fighter aerodrome, and then of note for its architectural interest. It has some medium significance as one of the main survivals at this otherwise extensively altered aerodrome. I agree with these findings.</p>

Any development proposed around the building should therefore seek to firstly preserve the building's importance and secondly preserve and/or strengthen its links with the wider aerodrome. In this respect the future of area D is of primary importance as this area forms the main parcel which separates the former NAFFI from the main airfield.

Areas B and C (to the east and south) form part of the setting of the building but do not have the same links with the rest of the aerodrome. I am mindful that when the aerodrome was fully functioning a part of this site (area B) was developed with three large 2 storey buildings oriented roughly on a north/south axis located immediately to the south of the parade ground. I am therefore satisfied that, in principle, a sympathetic development of area B will not adversely impact the setting of the heritage asset provided that the scheme is heritage led. However, there are also conservation area issues to consider which are set out below.

Area C is a narrow strip of land to the east of the former NAFFI which is heavily wooded. Its proximity to the listed building means that development here would have a direct impact and the building up of this part of the site would have a crowding effect and would not be supported. We welcome the principle of keeping this area clear of any form of development except as part of landscaping and/or biodiversity enhancements.

Area A comprises land to the west of Victor Beamish Avenue and east of the housing development in Collard Close. When the land was part of the functioning aerodrome some development was sited in this area. All vestige of the buildings has gone (except for some hard surfaces) and the site is heavily treed. As with other parts of the aerodrome the buildings were well spaced out set with generous open space surrounding them. Development of this part of the site would not affect the setting of the listed building or parade ground. However, it would impact on the character of the conservation area.

Area D forms the main part of the site and was the site of an extensive array of buildings for the airfield. Some were relatively small scale but the main feature of development in this area was the east/west orientation of buildings and the generous open space close to the listed building. New development in this part of the site is accepted as a matter of principle.

Conservation Area Impact

The Kenley Conservation Area Proposals Statement was produced in 2015 by both TDC and London Borough of Croydon. Its main aim is to preserve and enhance the area's character. In this respect emphasis is given to protecting its character and

integrity as an aerodrome, protect the heritage assets and protect the landscape and trees.

Using these criteria as measures by which to assess the proposed layout I have the following views in relation to the areas A, B, C and D.

Area A: The land to the west of Victor Beamish Avenue is now predominantly treed and provides a green and verdant entrance to the site. Housing grouped in a crescent removes the majority of trees and will significantly impact the character of this part of the site. My view is this this part of area A should remain undeveloped. I do note the comments of the Historic Buildings Officer who also indicated his concern over this part of the layout but did suggest the possibility of a 'gatehouse'. In heritage terms I note that a large building did occupy this entrance position which would justify the 'gatehouse' idea. However, the loss of trees would be significant and on balance I consider their loss to adversely affect the conservation area character.

Development in the northern part of this area might be acceptable subject to determining the extent of further tree loss.

Area B: This part of the site has an open character which will be significantly reduced by development. Development should look to the historic pattern and form in determining the layout. This would require a significantly larger area of green space towards Salmons Lane West and a smaller number of units on the site. I consider the open nature of the playing field contributes significantly towards the attractive character of this part of the conservation area. It is not doubt this feature which gave rise to the draft allocation policy stating that any scheme should focus development primarily to the northern area of the site.

Area C: Area C should not be developed at all (as per the submitted layout) as it provides a strong buffer area between any development and the adjoining countryside.

Area D: Area D houses a layout that pays little regard to the trees on the site and the form of development is unsatisfactory for a number of reasons which are set out separately. It is sufficient to note here that historic buildings officer considers the demolition of the workshop building will be harmful and will need to be accounted for as part of an overall scheme. Although no comment was made on the domestic nature of development immediately to the north of the School building, I consider that its shape, scale and form would adversely affect the setting of the heritage asset.

In conclusion, I consider that the current layout adversely affects the setting of the listed building and the historic aerodrome. I also

	consider that it adversely affects the character of the conservation area, contrary to policy DP20 and to guidance in the NPPF.
Renewable Energy	The proposal will be required to meet the terms of policy CSP14 which requires that development of more than 10 dwellings requires 20% percentage savings in Carbon Dioxide emissions through the provision of renewable energy technologies. No details are provided of how the development will meet those standards.
Economy	Not relevant except to note that the development will provide economic benefits.
Masterplan	<p>There are a number of points to raise under this section which are as follows and are additional to the comments made by the Historic Buildings Officer:</p> <ul style="list-style-type: none"> • We require a proposed layout to be superimposed on the tree survey to determine the likely extent of tree loss • The scheme fails to preserve the open character of the conservation area especially when viewed from Salmons Lane West • The crescent of houses on the west side of Victor Beamish Avenue at its southern end significantly reduces the undeveloped character of the location and adversely affects tree groups in this part of the site • Insufficient open space is provided in the southern part of the site to the east of Victor Beamish Avenue • No play space is provided within the development • Development immediately to the north of the school does not respect the historic character of development and affects the setting of the listed building • The layout of the northern part of the site is dominated by highly visible car parking from public areas • The layout of the northern part of the site is not guided or informed by the constraints of the site (in the form of tree positions) • The vista between the listed building and the main aerodrome is welcomed but needs to be designed as a major public space with no private garden space in front of the buildings • The incursion of car parking within the main landscape periphery is not generally acceptable

Closing Comments	I consider that the Council would not support the development of this site in its current form for the reasons set out below. Taken as a whole the proposal would be contrary to the development plan in that it does not accord with a number of policies which are considered relevant and would materially exceed the maximum
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number of dwellings to the detriment of a number of matters set out in the report.

Most importantly it does not accord with both national and local green belt policies. The test set by the NPPF requires the decision taker to ensure that very special circumstances exist whose benefits clearly outweigh the harms to the green belt and other harms arising. In order to come to this judgement, I first identify harms and the weight to be given to them and then the benefits and the weight they carry

The development will adversely affect the openness of the green belt to which I give substantial weight. It will also adversely affect the character of the area and the wider countryside, and I also afford this significant weight.

The development will also adversely affect the setting of the heritage asset and the character of the conservation area to which I give very great weight. I also give significant weight to the harm to existing trees. Harm may also arise from traffic generated by the development. However, these could be mitigated by measures that could be controlled either by conditions or legal agreements and I given this no weight.

The other matter which is likely to result in harm is the loss of the area used as a sports pitch by the school. I recognise the stance of Sport England and I consider the loss of the pitch to be a negative impact. However, I also recognise that the need for new housing in the district outweighs this harm in view of the Council not identifying the facility as either open space to be protected or an essential sports facility.

Set against these harms are a number of benefits. Firstly, the Council cannot demonstrate a 5-year housing land supply and this scheme would provide up to 88 new units. This need provides the exceptional circumstances required to consider a green belt release. I give this significant weight. The scheme would also make provision for affordable units which adds further weight to the provision of housing. That the scheme would also fulfil the objectives of sustainable development and I give very significant weight to the benefits to the proposal.

I am mindful of the draft allocation of the site in the emerging local plan which confirms the exceptional circumstances for amending the green belt boundary in this location. However, I have concerns that the draft policy does not sufficiently identify the potential constraints applying to the site. Given this concern and the objections received to the draft allocation which I do not believe have been satisfactorily addressed, I attach reduced weight to this matter, but the draft allocation nevertheless adds some weight to the benefits of the scheme.

	<p>In determining the planning balance and the weight that I have given to the considerations outlined above, I find that the appellant has not put forward other considerations that are sufficient to clearly outweigh the harm. As such, the harm to the Green Belt, to the heritage assets and the conservation area and any other harm is not clearly outweighed by other considerations. Consequently, in my opinion, the very special circumstances necessary to justify the development do not exist.</p> <p>My view is that a reduced scheme for this site which is heritage and tree constraints led could result in an acceptable solution for the site, but inevitably the numbers of units provided will drop substantially.</p>
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The advice given in this response is an informal opinion of the officer and cannot be held as binding upon the Council or its Members. These comments are made without the benefit of a comprehensive site visit or consultation with other bodies, such as County Highways.

Planning applications can now be submitted on the internet either through our Planning Interactive Service at <http://e-access.tandridge.gov.uk/planning/aup.asp> or via the Planning Portal's website at www.planningportal.gov.uk

Please refer to attached notes in relation to other relevant consultees and Community Infrastructure Levy.

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