

# Statement of Common Ground – Reasons for Refusal 3 and 4

**Appeal Reference: APP/M3645/W/24/3354498**

**Land South of Kenley Aerodrome, Victor Beamish Avenue, Caterham, Surrey, CR3 5FX**

**Parties entering in Statement of Common Ground:**

**Croydon and District Education Trust and Surrey County Council (County Highway Authority)**



1. This Statement of Common Ground (SoCG) has been prepared by Croydon and District Education Trust (CADET) (the appellant) and Surrey County Council (County Highway Authority) to accompany the appeal with reference APP/M3645/W/24/3354498 against the refusal by Tandridge District Council for outline planning permission for development of the site for 80 dwellings with all matters reserved aside from access at the Land off Salmon's Lane West to the south of Kenley Aerodrome, Victor Beamish Avenue, Caterham, Surrey, CR3 5FX (the Site).
2. On 26 February 2025 the County Highway Authority (CHA) confirmed that the provision of:
  - i. Three raised tables on Buxton Lane positioned carefully to provide a crossing point (with tactile paving) at appropriate locations; and
  - ii. Extension of the speed reduction scheme to Salmons Lane West, including providing a further pair of speed cushions.

Would address reasons for refusal three and four of decision notice 2023/878 in their entirety. These proposals are shown on plan 21 O60 55 – 07 Rev A (at Appendix 1 of this statement).
3. The reason that these measures adequately address the CHA's objections is that they would provide appropriate cycle and pedestrian infrastructure linking the site to key local amenities, which the planning application failed to do, and would provide a material benefit to the safe operation of the Buxton Lane / Salmons Lane West / Ninehams Road mini-roundabout junction.
4. In terms of cycle connectivity, Figure 4.1 of the Local Transport Note 1/20 sets out the appropriate protection from motor traffic on highways, based on daily vehicle flows and traffic speeds. Based on the traffic surveys provided by Motion in the 2023 dated Transport Assessment (at Appendix E), it is evident that this section of highway experiences traffic flows of approximately 2,600 movements daily. Given that the road is currently subject to a 30mph speed limit and that cycles mix with

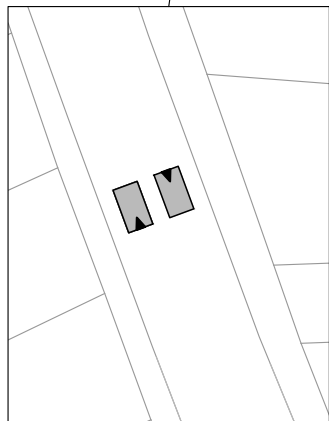
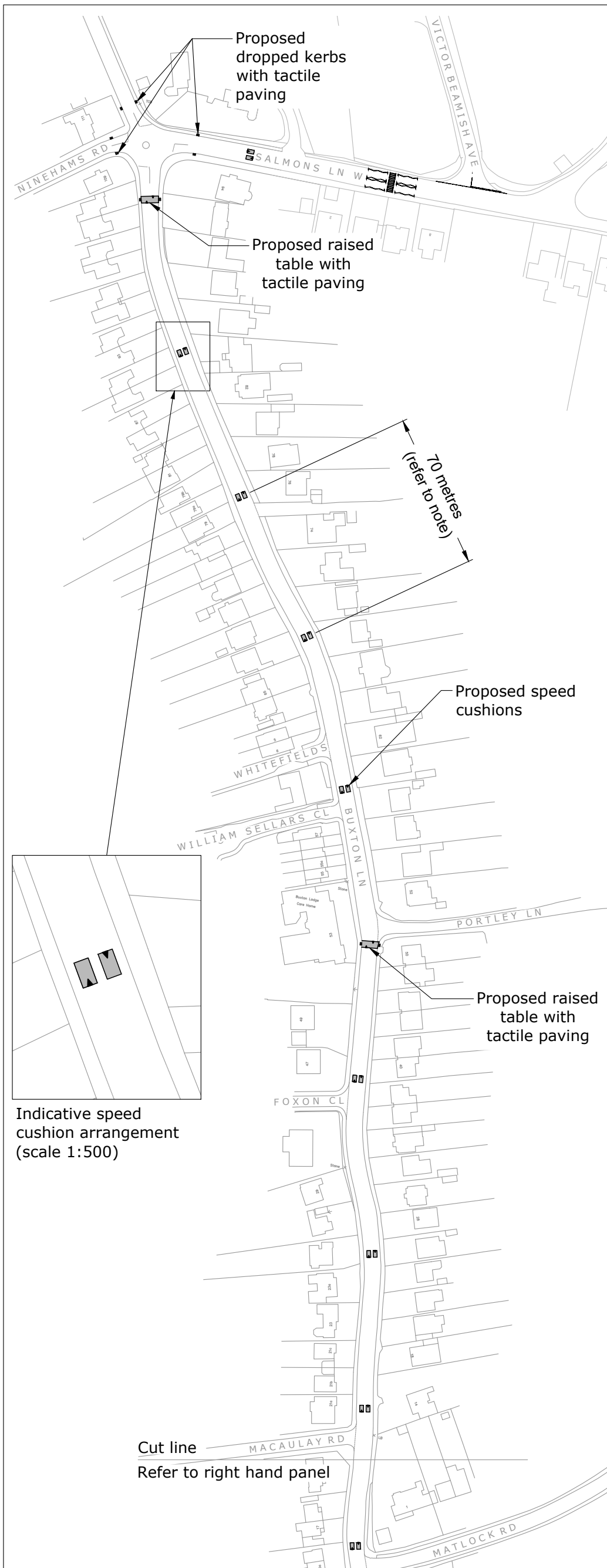
other vehicular traffic, the route without mitigation would fall within the red section of Figure 4.1 which is described in that document as “Provision suitable for few people and will exclude most potential users and / or have safety concerns”.

5. By reducing vehicle speeds to 20mph, the route would change to falling on the edge between the green and amber sections of that Figure, the green section representing “Provision suitable for most people” and the amber section representing “Provision not suitable for all people and will exclude some potential users and / or have safety concerns”.
6. In the context of the location and scale of development, it is considered that the above improvement in the suitability of the proposed route as a cycle connection is appropriate for the proposed development.
7. Regarding reason for refusal four, concerning the impacts at the roundabout junction, the reduction in vehicle speeds would significantly reduce the likely severity of any collisions at that junction and reduce the scope for conflicts between pedestrians and motor vehicles. The inclusion of dropped kerbs with tactile paving would further improve the safety and accessibility of this junction for pedestrians and would adequately address the needs of people with disabilities and reduced mobility, which the proposals had previously failed to achieve.
8. In terms of the element of the CHA’s objections which concerns capacity at the Buxton Lane / Salmons Lane West / Ninehams Road mini-roundabout junction, it is the view of the CHA that these additional measures would serve to reduce the generation of motor vehicle movements through the junction and thereby reducing the development’s impact on highway capacity in this location to a position where the residual cumulative impact would not be severe.
9. Reducing the reliance on the private car is considered the appropriate approach to mitigating the impacts of development on highway capacity, in particular in the context of the National Planning Policy Framework 2024 and Surrey’s Local Transport Plan 4.
10. The CHA’s Appeal Statement (dated 24 December 2024) identified a number of planning conditions it is common ground should be secured in the event planning permission is granted. (Appendix 2 of this statement)
11. Condition 2 from that list should be amended to the following:
  - 1) The development hereby approved shall not be first occupied unless and until a scheme of offsite highway improvements has been delivered via a section 278 Agreement with the County Highways Authority, in general accordance with the approved plans, to include the following (final details of all schemes to be determined through the S278 Agreement process):

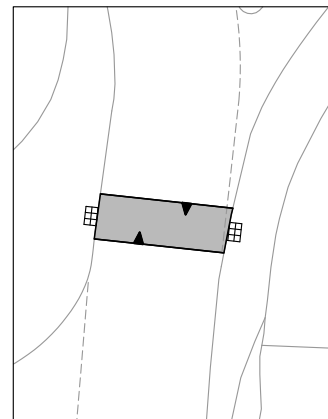
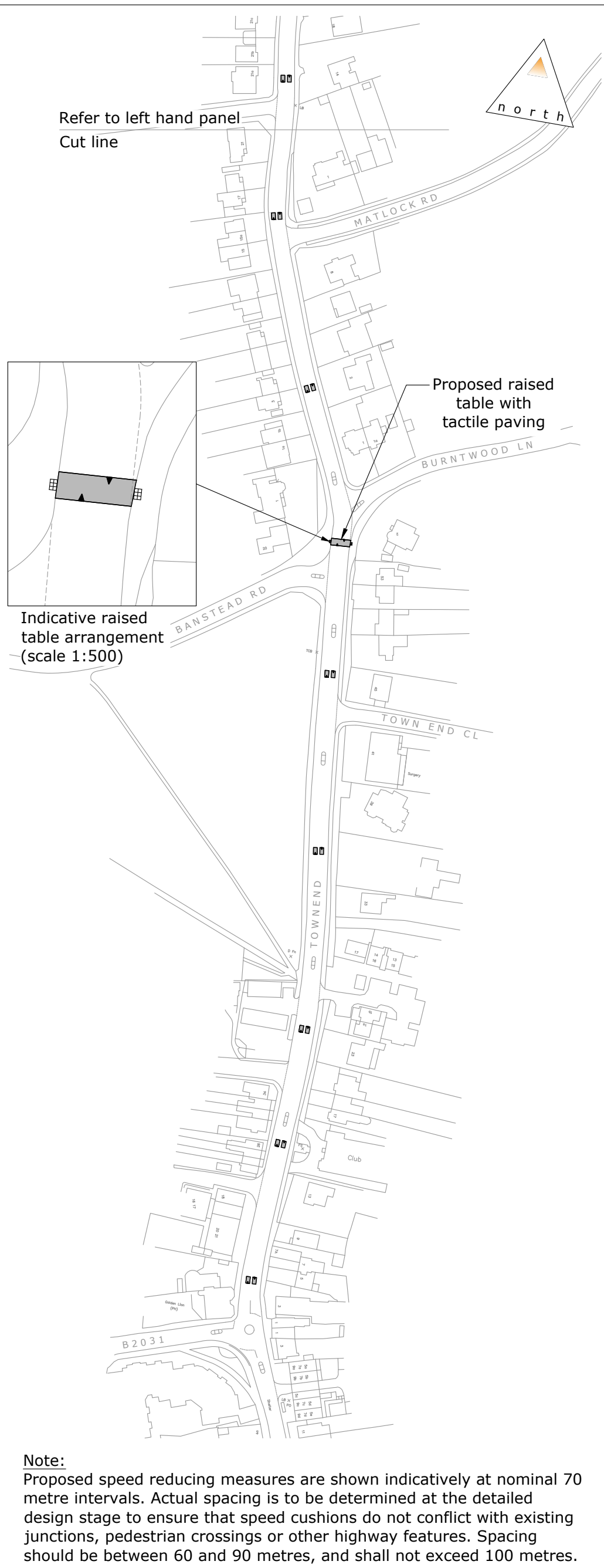
- a) zebra crossing on Salmons Lane, in the vicinity of Victor Beamish Avenue.
  - b) Bus stop improvements on Salmons Lane to include real time passenger information, double height kerbing and, where feasible, shelters and places to sit.
  - c) A zebra crossing on Whyteleafe Hill, in the vicinity of Salmons Lane.
  - d) A zebra crossing on Whyteleafe Hill, in the vicinity of Salmons Lane West.
  - e) Road safety and pedestrian infrastructure improvements at the Buxton Lane / Salmons Lane West / Ninehams Road roundabout junction, providing dropped kerbs with tactile paving as shown in plan reference 2106055-07 Rev A.
  - f) Traffic calming measures on Salmons Lane West, and on the B2030 from the roundabout junction with Salmons Lane West and Ninehams Rd, to the roundabout junction with the B2031) as shown in plan reference 2106055-07 Rev A.
  - g) Speed limit reductions and associated signage, including provision of all costs associated with delivering the Traffic Regulation Orders associated with item f above.
12. It is common ground that revised condition 2 is imposed if planning permission is granted. These obligations will also be reflected in the legal agreement.

Signed on behalf of the CHA 	Signed on behalf of the Appellant: 
Date: 27 February 2025	Date: 27 February 2025
Name: James Lehane Position: Principal Transport Development Planning Officer	Name: David McMurtary Position: Technical Director

## APPENDIX 1 – PROPOSED TRAFFIC CALMING ARRANGEMENTS BUXTON LANE / TOWNEND (REF. 2106055-07 REV A)



Indicative speed cushion arrangement (scale 1:500)





Indicative raised table arrangement (scale 1:500)

**Note:**

Proposed speed reducing measures are shown indicatively at nominal 70 metre intervals. Actual spacing is to be determined at the detailed design stage to ensure that speed cushions do not conflict with existing junctions, pedestrian crossings or other highway features. Spacing should be between 60 and 90 metres, and shall not exceed 100 metres.

**Key:**

-  Proposed speed cushions (refer to note)
-  Proposed raised tables



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Project:  
Salmons Lane West, Caterham

Title:  
Proposed Traffic Calming Arrangements  
Buxton Lane / Townend

Scale: 1:2,000 (@ A3)

Notes:

Drawing:  
**2106055-07**

Revision:  
**A**

## APPENDIX 2 – AGREED CONDITIONS

1. No development shall commence until a Construction Transport Management Plan, to include details of the following has been submitted to and approved in writing by the Planning Authority. Only the approved details shall be implemented during the construction of the development.
  - 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
  
2. The development hereby approved shall not be first occupied unless and until a scheme of offsite highway improvements has been delivered via a section 278 Agreement with the County Highways Authority, in general accordance with the approved plans, to include the following (final details of all schemes to be determined through the S278 Agreement process):
  1. A zebra crossing on Salmons Lane, in the vicinity of Victor Beamish Avenue.
  2. Bus stop improvements on Salmons Lane to include real time passenger information, double height kerbing and, where feasible, shelters and places to sit.
  3. A zebra crossing on Whyteleafe Hill, in the vicinity of Salmons Lane.
  4. A zebra crossing on Whyteleafe Hill, in the vicinity of Salmons Lane West.
  5. Road safety and pedestrian infrastructure improvements at the Buxton Lane / Salmons Lane West / Ninehams Road roundabout junction, providing dropped kerbs with tactile paving as shown in plan reference 2106055-07 Rev A.
  6. Traffic calming measures on Salmons Lane West, and on the B2030 from the roundabout junction with Salmons Lane West and Ninehams Rd, to the roundabout junction with the B2031) as shown in plan reference 2106055-07 Rev A.
  7. Speed limit reductions and associated signage, including provision of all costs associated with delivering the Traffic Regulation Orders associated with item f above.
  
3. The development hereby approved shall not be first occupied unless and until facilities for the secure, covered parking of bicycles and the provision of a charging point with timer for e-bikes by said 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 approved facilities shall be provided, retained and maintained to the satisfaction of the Local Planning Authority.

4. Prior to the occupation of the development a Travel Plan shall be submitted for the written approval of the Local Planning Authority in accordance with the sustainable development aims and objectives of the National Planning Policy Framework, Surrey County Council's "Travel Plans Good Practice Guide", and in general accordance with the 'Heads of Travel Plan' document (if appropriate, specify). The approved Travel Plan shall then be implemented (trigger point to be added on site specific basis) and for each and every subsequent occupation of the development, thereafter maintain and develop the Travel Plan to the satisfaction of the Local Planning Authority.
5. The development hereby approved will not be commenced unless and until the internal site layout has been designed in accordance with a scheme to be submitted to and approved by the Local Planning Authority to achieve compliance with Healthy Streets for Surrey design guidance in order to prioritise pedestrian and cycle movements within the development.
6. The proposed development hereby approved shall not be first brought into use unless and until at least two electric car club vehicles and car club spaces have been provided in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority. The car club parking space shall be provided with a fast-charge electric vehicle charging point (current minimum requirement: 7kw Mode 3 with Type 2 connector - 230 v AC 32 amp single phase dedicated supply) and nearby to accessible cycle parking facilities. The following shall also be included in the implementation of the car club:
  - a) The car club shall be promoted as part of sales and marketing of the development.
  - b) Membership offers shall be provided for users of the site; for example, one year's free membership and some free drive time, in consultation with the car club supplier and the Highway Authority.

Reasons: The above conditions are required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users. The above conditions are also required to satisfy the sustainable transport objectives of the NPPF (2024), policy DP4 of the Tandridge Local Plan (2008) and the objectives of the Surrey LTP4.