

**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.



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**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](mailto: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.

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**Signed:** Chris Reynolds

**Date:** 02/09/2022

**File Ref:** 32/10/Gen

**For the Director for Community Protection, Transport & Environment**