

**KENLEY AERODROME  
VICTOR BEAMISH  
AVENUE, CATERHAM  
SURREY, CR3 5FX**

**SUMMARY PROOF OF EVIDENCE: HERITAGE**

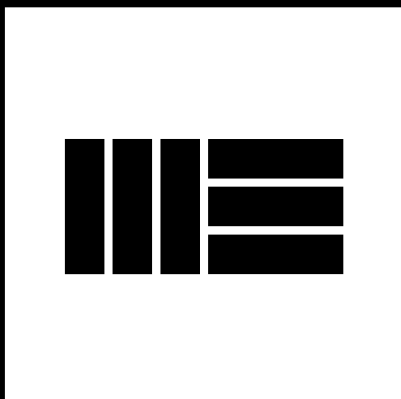
**APPELLANT: CROYDON AND DISTRICT  
EDUCATION TRUST**

**MS LUCY MARKHAM IHBC MRTPI**

**LPA REF: TA/2023/878**

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**FEBRUARY 2025**



# CONTENTS

1.0	HERITAGE EVIDENCE - SUMMARY.....	3
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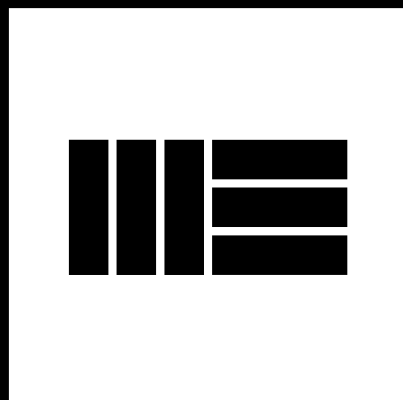
# 1.0 HERITAGE EVIDENCE - SUMMARY

- 1.1 My name is Lucy Markham and I am a Partner in the Planning and Development Department at Montagu Evans. I am appearing at this Inquiry on behalf of Croydon and District Education Trust (“the Appellant”). I was first approached by the Appellant in October 2021 to provide heritage consultancy services in relation to their emerging scheme at Kenley Aerodrome, Victor Beamish Avenue (“the Appeal Site” or “the Site”).
- 1.2 The District Council does not employ conservation officers, and as per other districts in the county, historic buildings advice is provided by the County Council. The Appellant engaged with the County Council Historic Building’s team at pre-application stage, and responded to their feedback prior to the submission of the application, and during determination. Amendments were made to the design in response to their letter dated 7th September 2023.
- 1.3 Surrey County Council’s Senior Historic Buildings Officer concluded that there would be harm from the scheme from the demolition of the Former Workshop and whilst the rest of the Site would significantly change from its current character and appearance, this did not necessarily equate to harm. The County Council concluded the scheme was capable of delivering an overall benefit to the conservation area.
- 1.4 Despite the positive consultation response from the County Council, the application was refused on heritage grounds on 13 May 2024.
- 1.5 The sixth reason for refusal (RfR) stated that insufficient information had been provided to allow a full assessment of the potential harm to designated and non-designated heritage assets. The District Council has agreed that this reason could be removed with an appropriately worded condition. The condition secures the heritage benefits identified by the County Council.
- 1.6 The fifth RfR related to the felling of trees and effect on trees in the CA. The District Council has agreed that the Supplementary Tree Plan has resolved their concerns with respect to the felling and replacement of trees and that there are no arboricultural matters in dispute. The District Council consider that there would be an unacceptable effect on the character and appearance of the Conservation Area (CA) in the period after the trees are felled and before the new trees reach maturity. The District Council has agreed that their concerns about the effect of the CA in the long term have been resolved via the planning condition cited above.
- 1.7 The Heritage Statement (CD.1.30) submitted with the application assesses the significance of the designated and non-designated heritage assets and provides an assessment of the effect of the proposals on their significance. This is consistent with paragraph 207 of the 2024 NPPF, which requires applicants to do this.
- 1.8 The relevant heritage assets comprise:
  - Kenley Aerodrome Conservation Area.
  - The former Dining Room and Institute, grade II listed.
  - The former workshops, a non-designated heritage asset.
- 1.9 The effect on the listed former NAAFI is no longer a reason for refusal, and the District Council has agreed that a planning condition addresses their concerns. The historic building officer at the County Council did not identify harm to the listed building. I agree.
- 1.10 The CA Statement (CD.6.07) states that the special reason for designating Kenley Aerodrome as a CA is the completeness of the remaining Battle of Britain airfield, which it identifies as being of national historic significance. The CA Statement does not mention trees in the analysis of this part of the CA. My assessment is that the trees that were planted as part of the 1930s works to the aerodrome contribute most to the historic character of the Site; these include the trees around the southern, eastern and western edges of the parade ground, along the east side of Victor Beamish Avenue, and forming an avenue along the footpath to the east of the Site.
- 1.11 There would be limited effect on the airfield or CA as a whole which remains relatively intact. The proposals only affect one part of the CA, and not the airfield itself which remains operational. The adopted CA Statement anticipated development of the Site (CD.6.07, p. 20). The proposals would provide a beneficial new use for disused brownfield land

within the CA. There is a historic precedent for residential use in this part of the Site. The proposals would improve public access and the permeability of the CA, and would re-establish the historic visual and functional connection between the listed former NAAFI Building and the aerodrome.

- 1.12 I agree with the County Council that when considered in isolation the demolition of the former workshop would cause a degree of harm to the CA, that this would be less than substantial. The harm to the CA as a whole would be at the very lowest end of the scale, given the dilapidated state of the building and because it was a small, ancillary structure, and not an important feature when the airfield was operational. The replacement of the workshop with a high quality residential development, which responds positively to the military heritage of the Site would improve the character and appearance of the CA.
- 1.13 The demolition of the former workshop would result in harm to the non-designated heritage asset. The harm is limited because the workshop is of very low significance. It is also beyond reasonable repair. I agree with the historic building's officer that the workshop should be recorded prior to demolition, so that its historic interest is retained as far as possible. This can be secured via planning condition.
- 1.14 Overall, I conclude that the proposals would result in an enhancement to the character and appearance of the CA, particularly when considering the following heritage benefits:
- The creation of the view and physical link between the former NAAFI Building and the airfield along a central axis.
  - The reinstatement of the historical linear arrangement of buildings facing Victor Beamish Avenue.
  - The reinstatement of historic footpaths (to be secured via planning condition).
  - The creation of a commemorative structure/ feature (to be secured via planning condition).
  - The reinforcement of the historic landscape design by planting of new trees on the west side of Victor Beamish Avenue, in a row to the south of the parade ground and to reinforce the avenue either side of the footpath to the north-east of the Site (to be secured via planning condition).
- 1.15 The only point of disagreement with the Council relates to the effect of the tree proposals on the CA, specifically on the effect to the CA in the period when the new trees reach maturity. The Council's position seems irrational. They object to a temporary (alleged) harm to the CA that would deliver a permanent benefit to the CA. I do not consider this to be a valid rationale for refusing the application.
- 1.16 All the category A (high quality) trees would be retained, as well as the trees along Victor Beamish Avenue, the woodland trees to the east and the category A trees in the central part of the Site, and the trees planted as part of the 1930s works to the aerodrome. The majority of trees that would be removed are poor quality. Overall there would be a net gain of trees in the Site, and the total canopy would be increased after 30 years. Once the new trees are established the general contribution of trees to the character and appearance of the CA would be enhanced.
- 1.17 There would be a temporary period after the trees are felled before the new trees are established, when the contribution of trees to the CA would be reduced. The visualisations reproduced in **Appendix 2.0** of the main proof illustrate that even after 5 years the new trees would contribute positively to the character and appearance of the CA, and this effect would increase over time. In the same period as the trees are planted the Site would be redeveloped with well-designed housing and public realm, which would deliver the majority of the benefits set out above. I therefore do not consider that the temporary period while the new trees reach maturity would harm the CA.
- 1.18 Notwithstanding this view, if the Inspector agrees with the Council that there would be some residual harm to the CA in the period until the trees reach full maturity, the level of harm would be marginal and very low. The temporariness of the effect and the fact that the effect would reduce as time progresses, is relevant to the weight the harm should be given. Short term effects are of less weight in the planning balance than permanent effects.

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