

**TOWN AND COUNTRY PLANNING ACT 1990
(AS AMENDED) - SECTION 78 APPEAL BY
CROYDON AND DISTRICT EDUCATION TRUST**

**Kenley Campus, Victor Beamish Avenue,
Caterham CR3 5FX**

Proof of Evidence of
Stephen Kirkpatrick (BSc BLD CMLI) on
Landscape and Visual Matters

on behalf of the Appellant

LPA REFERENCE: TA/2023/878
PINS REFERENCE: APP/M3645/W/24/3354498

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1.0 INTRODUCTION

1.1 Qualifications and Experience

- 1.1.1 My name is Stephen Kirkpatrick and I provide evidence on landscape and visual matters for Croydon and District Education Trust ("the Appellant"). I hold a Bachelor of Science degree (Biological Sciences) from Dundee University and a Bachelor of Landscape Design degree from Manchester University. I am a landscape architect, a Chartered Member of the Landscape Institute and a Director of Scarp Landscape Architecture Ltd ("Scarp"), which is a landscape architectural and environmental planning consultancy based in Henley-on-Thames, South Oxfordshire.
- 1.1.2 My professional experience as a landscape architect spans more than 30 years and includes both the private and public sectors. My experience covers a broad range of project and development types but my main specialisations are in the fields of environmental planning, landscape/townscape character assessment and landscape and visual impact assessment.
- 1.1.3 I have undertaken numerous consultancy studies concerned with the balance between development and landscape conservation, including landscape sensitivity and capacity studies undertaken on behalf of local planning authorities to inform emerging development plans. I have worked on the design and impact assessment of numerous projects within sensitive townscapes and landscapes, including conservation areas, National Landscapes and National Parks. The scale of my landscape design and masterplanning work has varied from individual dwellinghouses (brought forward as dwellings of exceptional quality under NPPF Paragraph 84 of the NPPF) to mixed use urban extensions for up to 3000 dwellings. I have provided inputs to Environmental Impact Assessments for strategic-scale housing and employment, science parks, hotel and holiday lodge development, roads and railways, all in accordance with national assessment guidelines and best practice. I have presented landscape and visual evidence at numerous public inquiries, acting for developers, local planning authorities and community groups. This expert witness work has considered the effects of wind farm, residential, commercial, mixed use and crematorium development proposals in a wide range of contexts.
- 1.1.4 I confirm that the evidence that I have prepared and provide for this appeal ("the Appeal", reference APP/M3645/W/24/3354498) has been prepared and is given in accordance with the guidance of my professional institution. I also confirm that the opinions expressed are my true and professional opinions.

1.2 Background to the Planning Inquiry

1.2.1 The Appellant submitted an outline planning application (Ref: TA/2023/878) (“the Application”) to Tandridge District Council (“the Council”) in July 2023 for the development of up to 87 new dwellings, with associated landscaping, amenity space and car parking. The delegated officer’s report dated 13th May 2024 (“the OR”) recommended that the Council refuse to grant planning permission for the Application. Seven reasons for refusal (RfR) were set out in the decision notice dated 13th May 2024. The second and fifth RfR relate to landscape issues and are as follows:

“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).”

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).

1.2.2 Scarp was originally commissioned by the Appellant in December 2021 to prepare a landscape strategy and Landscape and Visual Impact Appraisal (LVIA) [CD1.17] of the Appeal Scheme to accompany the planning application. This LVIA was prepared in accordance with national guidance prepared by my professional body, i.e. the Guidelines for Landscape and Visual Impact Assessment [CD6.47]. I acted as project director for this commission and was responsible for preparation of the LVIA report, Landscape General Arrangement Plans and inputs to the Design and Access Statement [CD1.15], which included strategies for trees, biodiversity and ecology, children’s play and green infrastructure. I was subsequently commissioned to prepare and present this landscape and visual evidence on behalf of the Appellant at the Appeal.

1.2.3 My evidence addresses the landscape and visual matters embedded in RfR2 and RfR5. I also comment on issues set out in the Council’s Statement of Case [CD10.01] and on following two landscape-related areas of disagreement that are identified in the Main Statement of Common Ground [CD11.01]:

“The compliance of the proposals to meet the ‘Golden Rules’ tests set out in paragraph 159 of the NPPF. Although the Council accepts the site is Grey Belt, the Council does not accept that the proposals will deliver necessary improvements to the local or national infrastructure.”
(Paragraph 9.1.2)

“Regarding trees it remains an area of disagreement whether during the maturity of trees to be replanted there will be an unacceptable effect upon the character and appearance of the Conservation Area and/or an unacceptable impact upon the local landscape.” (Paragraph 9.1.6)

1.2.4 My evidence makes reference to the site appraisal and site context photographs that form part of the LVIA. These photographs are provided in my **Appendix A** for ease of reference.

3.0 THE APPEAL SITE

3.1 Appeal Site Context

3.1.1 Section 2.0 of the Main Statement of Common Ground [CD11.01] makes reference to RAF Kenley Aerodrome to the north and residential areas to the east, south and west of the Appeal Site. The landscape context of the Appeal Site is more fully described in Section 2.0 of the LVIA [CD1.17], including building and vegetation patterns, connectivity and Local Green Spaces.

3.2 Appeal Site Description

3.2.1 A description of the Appeal Site is provided in Section 2.0 of the Main Statement of Common Ground [CD11.01]. A more detailed description is provided in Section 5.0 of the LVIA, including buildings, tree groups and boundary definitions. As noted in LVIA Table 1 (Assessment of Landscape Value), the Appeal Site does not form part of a landscape that is designated at either local or national level to protect its scenic value.

3.3 Appeal Site Character

3.3.1 The Appeal Site has a developed, brownfield character that arises from (1) Victor Beamish Avenue and other roads across the site; (2) mounds of rubble and large areas of hard-standing in the northern part of the Appeal Site; (3) areas of hard-standing and/or roads in the southern part of the Appeal Site (on both sides of Victor Beamish Avenue); (4) the electricity sub-station adjacent to the southern site boundary and (5) security fencing along both sides of Victor Beamish Avenue and along the boundary with the airfield and its access road.

3.3.2 The mounds of rubble and areas of hard-standing are long-standing features of the Appeal Site and were present when the Oakhill Education Trust purchased the site in 2003. The photographs at **Plates 1 to 4**, which I took when I first visited the site in December 2021, illustrate some of these features.

3.3.3 The centrally located school building (off-site), aerodrome buildings, Victor Beamish Avenue, areas of hard-standing and housing on the southern, eastern and western sides of the Appeal Site collectively have a strong urbanising influence on the Appeal Site.

3.3.4 The northern part of the Appeal Site has an air of dereliction and relatively low levels of visual amenity resulting from mounds of rubble, unmanaged vegetation, weeds, areas of broken hard-standing and the dilapidated workshop building. The widespread use of security fencing detracts

from visual amenity. Mature on-site trees and off-site woodland provide the Appeal Site with a verdant character. The Appeal Site is not tranquil due to street lighting and the noise/sight of traffic using Victor Beamish Avenue and adjacent roads.



Plate 1: View looking south towards the Appeal Site from the southern part of Kenley Aerodrome (December 2021)



Plate 2: View looking west across northern part of site with housing along Collard Close at the rear (December 2021)



Plate 3: View looking south along eastern part of Appeal Site, including on-site derelict building (December 2021)



Plate 4: View of existing road, building and mounds of rubble in northern part of the Appeal Site, looking north to aerodrome (December 2021)

3.4 Landscape Capacity and Sensitivity

- 3.4.1 As set out in Section 4.3 of the LVIA [CD1.17], the Tandridge Landscape Capacity and Sensitivity Study, provides an assessment of the landscape capacity and sensitivity of the Appeal Site to accommodate new housing development. This study was prepared by Hankinson Duckett Associates (Chartered Landscape Architects) on behalf of Tandridge District Council. The Appeal Site was assessed as Site CAT 040 and the findings of the assessment are provided in my Appendix A.
- 3.4.2 In terms of local distinctiveness, the site scored only 2 out of 5, with the assessment noting that *“The site is unremarkable to the south of the school. To the north the setting is more distinctive as it is visually linked to the aerodrome.”* The study concluded that *“Site CAT040 is judged to have a medium landscape capacity for housing development. The site would potentially be suitable in landscape terms for limited development proposals, but would need to demonstrate no adverse impacts on the setting of the existing landscape and settlement, including the conservation area.”*

4.0 COMMENTARY ON REASON FOR REFUSAL 2

4.1 Introduction

4.1.1 RfR 2 asserts, amongst other things, that 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.

4.1.2 This section of my proof considers the nature of Green Belt openness and the nature of the alleged harm. Reference is made to site appraisal photographs (winter conditions) and site context photographs from publicly accessible viewing positions (winter and summer conditions) in **Annex A**.

4.1.3 The relationship between the Appeal Site and the Green Belt in Tandridge District is identified on **Plate 5** below.

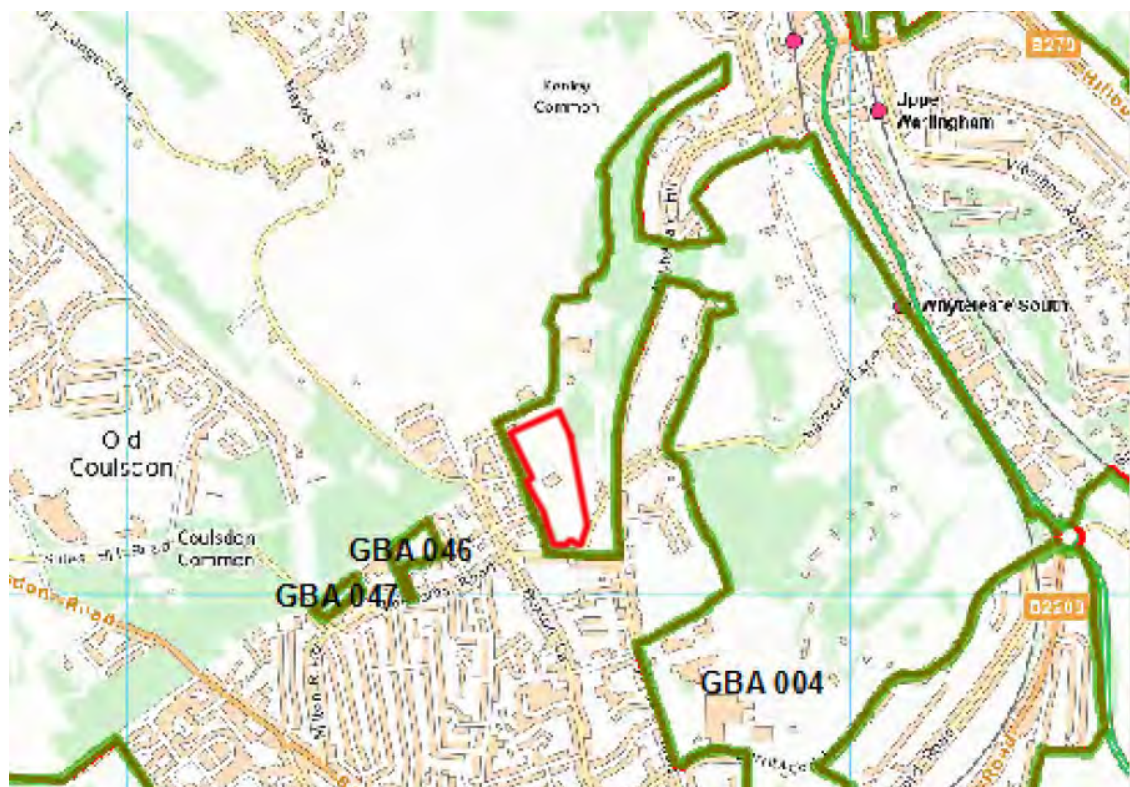


Plate 5: Relationship of the Appeal Site to Green Belt in Tandridge District (with base extracted from Tandridge District Council Green Belt Assessment December 2015)

4.2 The Nature of Green Belt Openness

- 4.2.1 In view of the core role of openness in RfR2, I set out below a few preliminary observations about its meaning and its relationship both to the purpose of the Green Belt and to landscape/visual considerations.
- 4.2.2 Together with permanence, openness is one of the “*essential characteristics*” of the Green Belt [NPPF Para. 142]. Whilst it is not defined – for example, in the Planning Portal glossary - development that involves “*the construction of new buildings*” in the Green Belt is regarded as “*inappropriate*”, due to the loss of openness (NPPF Para. 154). Openness can therefore be defined, for the purpose of protecting the Green Belt, as “*an absence of built development*”.
- 4.2.3 It is a relative concept, since few parts of the Green Belt are entirely devoid of buildings. As a designation, Green Belt typically ‘washes over’ small settlements and individual buildings, where these do not compromise its overall characteristic of openness. In the vicinity of the Appeal Site, for example, the Green Belt includes the NAAFI building, housing along the eastern boundary of the Appeal Site and aerodrome buildings on the northern and north-eastern sides of the Appeal Site.
- 4.2.4 Whilst the openness of the Green Belt is primarily a land-use - as opposed to landscape - concept, it is of course perceived visually. It therefore influences the degree of visibility within an area, and the character of the relevant views. In simple terms, as an area becomes more built-up, visibility tends to become restricted, and the views that remain become more enclosed and urban in character.
- 4.2.5 Openness therefore has both a spatial dimension (i.e. whether land is devoid of buildings) and a visual dimension (i.e. how readily this openness can be perceived). This is confirmed by the Planning Practice Guidance¹ [Paragraph 001, Ref ID:64-001-20190722], which states that: “*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*”.
- 4.2.6 The relationship between these two forms of openness is not always straightforward. This is demonstrated in the vicinity of the Appeal Site, which includes a large number of mature trees and is partially adjoined to the east and northeast by established woodlands. These contribute to a sense of enclosure along the Appeal Site perimeter, whilst remaining “open” in Green Belt terms: i.e., substantially devoid of built form.

¹ <https://www.gov.uk/guidance/green-belt>

- 4.2.7 Openness is also a fundamental attribute of the countryside – as reflected in use of the term “open countryside” – and relates both to the relative absence of buildings and the preponderance of land uses that typically maintain its visual openness. The introduction of built development has implications for openness in both these senses, as well as for the character of an area in terms of the relationship between urban and rural influences.
- 4.2.8 Paragraph 153 of the NPPF states that *“When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness⁵⁵. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved 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.”* Footnote 55 states that *“Other than in the case of development on previously developed land or grey belt land, where development is not inappropriate.”*
- 4.2.9 Paragraph 153 does not apply in the case of development on previously developed land or grey belt land where the development is not inappropriate.
- 4.2.10 Paragraph 154 of the NPPF states, amongst other things, that *“Development in the Green Belt is inappropriate unless one of the following exceptions applies:”*
- “g) limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.”*
- 4.2.11 Paragraph 155 of the NPPF states that *“The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where:*
- a) *The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
 - b) *There is a demonstrable unmet need for the type of development proposed;*
 - c) *The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and*
 - d) *Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below.”*

- 4.2.12 Paragraph 156 of the NPPF states that *“Where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application, the following contributions (‘Golden Rules’) should be made:*
- a. affordable housing.....”;*
 - b. necessary improvements to local or national infrastructure; and*
 - c. the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through on-site provision or through access to offsite spaces.”*
- 4.2.13 Paragraph 158 of the NPPF states that *“A development which complies with the Golden Rules should be given significant weight in favour of the grant of permission.”*

4.3 Effects of the Appeal Scheme on Green Belt Openness

Introduction

- 4.3.1 The planning evidence of Ms. Yarker identifies three approaches or routes for assessing the effects of the Appeal Scheme on Green Belt openness in the context of national planning policy, i.e.

Route 1: That the development is not inappropriate with reference to paragraphs 153 and 155 of the NPPF given that it is common ground that the site is grey belt and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan. With reference to paragraph 156 of the NPPF, the development proposals meet the ‘Golden Rules’ requirements for contributions. In this regard the proposals will deliver 50% affordable housing, deliver the necessary improvements to local infrastructure and provide new green spaces that are open to the public. Ms. Yarker addresses the contributions made under paragraphs 156(a) and 156(b) whilst I consider the ‘new green spaces’ component of the ‘Golden Rules’ requirements, as set out in paragraph 156(c) in my evidence below.

Route 2: That the development is appropriate development with reference to paragraph 154 (g) namely that the development is the complete redevelopment of previously developed land that would not cause substantial harm to the openness of the Green Belt. I consider the issue of previously developed land in relation to Green Belt openness in my evidence below.

Route 3: Finally, Ms. Yarker provides evidence that very special circumstances do exist as any inappropriateness or other harm resulting from the proposal is clearly outweighed by other

considerations. My evidence identifies the limited effects on the visual openness of the Green Belt and the landscape enhancements that would be delivered by the Appeal Scheme. These considerations are supplemented by Ms Markham's evidence regarding the demonstrable heritage benefits that will arise from the proposals.

Previously Developed Land

- 4.3.2 Previously developed land is defined in Annex 2 (Glossary) of the NPPF as *"Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed."* The definition also sets out a number of exclusions, including *"land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape"*.
- 4.3.3 The Council's Green Belt Assessment Part 3 – Appendix 1 (2018) states that *"the site is previously developed land"*, as agreed at Paragraph 7.7 of the Main Statement of Common Ground [CD11.01]. Paragraph 7.8 of the OR states that whilst 'limited parts' of the Appeal Site *"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"*. The OR assessment had not factored in the presence of (1) Victor Beamish Avenue and its adjacent footpath; (2) other roads across the northern part of the Appeal Site; and (3) the electricity sub-station adjacent to the southern site boundary; (4) wire mesh security fencing along both sides of Victor Beamish Avenue and along the periphery of the Appeal Site (except the off-site section of Victor Beamish Avenue, which is defined by close-board timber fencing); (5) the aggregate, rubble and foundations (of former military buildings) associated with the former 'kick-about' area for the children of One School Global; and (6) the extent of areas of hardstanding across the Appeal Site. These areas are located both to the north (**Plate 6** below) and south (**Plate 7** below) of the NAAFI building. Some of these areas are illustrated by the photograph at **Plates 1 to 4** (taken in December 2021 submission but reflecting existing site conditions).



Plate 6: Areas of hard-standing in the northern half of the Appeal Site



Plate 7: Areas of hard-standing in the southern half of the Appeal Site

- 4.3.4 These areas of hard-standing vary in size, some wide and expansive, others narrow and linear. They have not 'blended into the landscape' as they are readily noticeable (**Plates 1 to 4**). They remain clearly visible as hard-surfaces and are a prominent component of views for people walking through the Appeal Site or looking towards the Appeal Site (e.g. housing along Collard Close to the west or from the Kenley Airfield Heritage Trail (Plate 1 of LVIA, CD1.17) along the northern site boundary.
- 4.3.5 The full extent of buildings and hardstanding (excluding ancillary features such as fencing and the base for a former flagpole in the far southern part of the Appeal Site) is identified on **Plate 8**. The area calculations are as follows:
- Hardstanding: 1.2ha (27.2%)
 - Building Footprint: 0.115ha (2.6%)
- 4.3.6 The combined total for hardstanding and the building footprint is 1.315ha (29.8%). It should also be noted that combined total for hardstanding and the building footprint for the One School Global site is 0.683ha.
- 4.3.7 I consider that the Appeal Scheme (1) represents the complete redevelopment of previously developed land that would not cause substantial harm to the openness of the Green Belt and (2) is not inappropriate development in the Green Belt based on paragraph 154(g) of the NPPF.

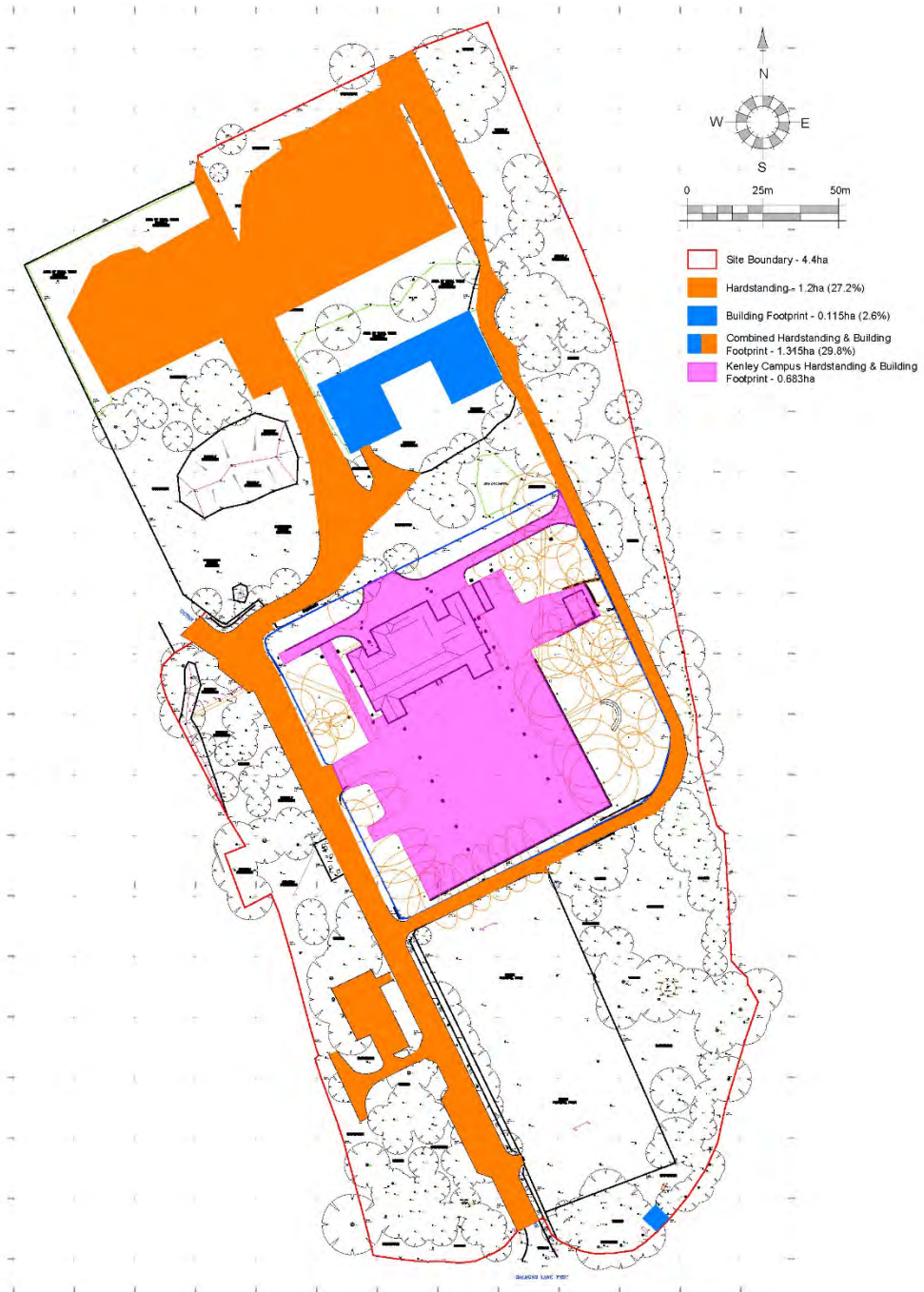


Plate 8: Existing Hardstanding and Building Footprint Areas

Loss of Green Belt Spatial Openness

4.3.8 OR Paragraph 7.12 states that *“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."

- 4.3.9 The Building Heights Diagram/Parameter Plan [CD1.03] identifies that the majority of the proposed dwellinghouses would be 2 storeys in height with 3 storey buildings restricted to the northern-central part of the Appeal Site, where they would define the central pedestrian axis and the vista between the aerodrome and the NAAFI building.
- 4.3.10 In spatial terms, significant harm to openness would be an inevitable consequence of developing the Appeal Site as there would be notable increases in both built form and hard-standing. This would also have been the position had the Council's draft allocation HSG06 (included in the Withdrawn Our Local Plan 2033, CD6.01) been brought forward for development. The duration of the loss of spatial openness, arising from an expansion of the settlement, would be long-lasting and the new dwellings would bring related activity from its residents.

Loss of Green Belt Visual Openness

- 4.3.11 The Appeal Site has a high degree of visual enclosure in terms of external views, it includes existing built form and hard-standing, it is subject to the urbanising influence of existing built form (both within and adjacent) and the urbanising elements are seen by relatively few receptors within or in very close proximity to the Appeal Site. Existing views obtained by people travelling along Victor Beamish Avenue are either filtered or partially truncated by roadside trees (summer months) and security fencing.
- 4.3.12 OR Paragraph 7.13 correctly assesses how views towards the Appeal Scheme from roads, residential properties and publicly accessible greenspace to the south, southeast and east would be substantially enclosed in both winter and summer months by peripheral vegetation within the Appeal Site (**Photographs 6 to 11B**). In the case of **Photograph 8**, filtered views of the proposed housing would be obtained to the rear of retained trees along both sides of Victor Beamish Avenue and in the context of off-site housing. Existing filtered views of the listed school building would be enclosed by the new built form, which would be set back from Salmons Lane West by a retained belt of well-treed greenspace. The viewing corridor along Victor Beamish Avenue, and its associated sense of visual openness, would be conserved and the amenity of the view enhanced by the removal of the security fencing. In the case of **Photograph 9**, an existing glimpsed winter view of the school building/potential view of the proposed built form would be enclosed by reinforced site boundary vegetation. Views towards the Appeal Scheme from Whyteleafe Road and adjacent residential properties to the northeast would be completely enclosed by intervening woodland.

- 4.3.13 In the case of **Photographs 10, 11, 11A and 11B** from the southeast and east, the proposed built form would not be visible in either the winter or summer months due to the enclosure provided by intervening buildings and mature tree/shrub vegetation.
- 4.3.14 In the case of views from the west, some filtered views of the proposed housing would be available from the upper rear windows of housing that abuts, or lies close to, the western site boundary and some glimpsed views would also be available from short sections of Halton Road and Hillhurst Gardens (**Photographs 4 and 5**) with some resultant loss of Green Belt visual openness. In the case of the Halton Road housing, the new housing would replace existing views of the school building, with resultant reduction in the loss of visual openness. In the case of views from the upper rear windows of housing that lies opposite the northern part of the Appeal Site (i.e. along Collard Close), the views of the new built form would be more open but would replace existing views of the derelict workshop, roads and extensive areas of hard-standing. The Appellant disagrees with the case officer assessment at OR Paragraph 7.69 that the Appeal Scheme “*would have a noticeable and substantial visual impact on the character at the fringe of Caterham-on-the-Hill*”. Whilst it would certainly be noticeable from upper rear windows, potentially even some loss of outlook, the new housing would be seen set amongst a strong framework of greenspaces with retained/supplementary trees and would not result in a ‘substantial visual impact’. As noted at OR Paragraph 7.99, any issues relating to potential overlooking and loss of privacy could be addressed at the Reserved Matters stage (should this appeal be granted).
- 4.3.15 There would be a reduction in the openness of near distance views from the southern edge of the existing aerodrome as a greater amount of built form would be present in the view and it would be located closer to the viewer compared to the existing school (**Photograph P**). Views would be partially enclosed by aerodrome buildings and fencing (**Photographs M and Q**) and would be filtered or partially enclosed by proposed tree/shrub vegetation along the northern boundary of the Appeal Site. This vegetation would also enclose views of parked vehicles. A tree-lined viewing corridor would be provided towards the NAAFI building, thereby conserving a sense of visual depth through the northern part of the Appeal Site. Views of the east-west orientated ‘barrack block’ terraces proposed parallel to the northern site boundary would be perceived in the context of the nearby off-site aerodrome buildings (**Photographs O and 1**) and would replace existing views of the school and workshop buildings. From more northerly locations within the aerodrome, some glimpsed views of the roofs of proposed housing are likely to be seen to the rear of the airfield storage buildings and in the context of existing residential buildings (**Photographs 2 and 3**). The Appeal Scheme would result in only a negligible reduction

in the openness of these Green Belt views and would not affect any of the long distance views that are available from the aerodrome (**Photograph 2A**).

- 4.3.16 The proposed housing would truncate some of the existing outward views from Victor Beamish Avenue, both to the east and the west. Housing has been located close and parallel to the road wherever possible in response to the advice from the Senior Historic Buildings Officer at Surrey County Council so that *“buildings mostly reflect the historic linear appearance of the buildings which faced directly on to Victor Beamish Avenue”* (OR Paragraph 7.85/‘Western Area’ section). However, the Appeal Site would conserve a sense of visual openness as people move along the Victor Beamish Avenue. This would be due to (1) the removal of the roadside security fencing; (2) the set-back of some of the buildings on the eastern side of Victor Beamish Avenue; (3) the retention of the off-site playground at the school; the retention of the long vista along the avenue; (5) provision of pockets of publicly accessible greenspace on the western side of the avenue (DAS Section 6.7, CD1.15); and (6) glimpsed views of woodland in the eastern part of the Appeal Site would be available between the proposed housing units.
- 4.3.17 The Appeal Scheme would result in a significant level of harm to Green Belt visual openness within the Appeal Site but a high degree of visual permeability would be retained between the proposed buildings. This would also have been an inevitable consequence of the Council’s draft allocation HSG06 (included in the Withdrawn Our Local Plan 2033, CD6.01) had it been brought forward for development. The harm to visual openness is reduced in the context of (1) existing built form on the Appeal Site, in the school grounds and adjacent to the western, southern and eastern site boundaries; and (2) the enclosure provided by site periphery woodland.
- 4.3.18 The extent of harm to visual openness outside the Appeal Site is highly limited in extent, as identified on **Plate 9**. It would be restricted to (1) short sections of Salmons Lane West (to the south) and Salmons Lane (to the southeast) alongside the site boundary; (2) the southern part of Salmons Lane Green; (3) a short section of Whyteleafe Road on the eastern side of the green; (2) a small number of houses adjacent to these sections of road; (4) housing directly alongside the western site boundary (oblique or direct views, heavily filtered in places); (5) short sections of Collard Close where there are gaps in the line of western site boundary housing; and (6) the section of aerodrome perimeter road alongside or approaching the northern site boundary.



Plate 9: Visibility of the Appeal Site in External Views (availability of residential views in orange/views from surrounding roads and footpaths by blue line, with additional views form southern part of Salmons Lane Green (location identified by blue asterisk)

4.3.19 For the viewing positions located to the south and southeast of the Appeal Site, the extent of harm to visual openness is also highly limited in degree due to the substantial enclosure of winter and summer views provided by existing trees and understorey shrubs within peripheral parts of the Appeal Site (**LVIA Photographs 7 to 11**). This harm to visual openness is further reduced by the presence of the school building in these glimpsed views into the Appeal Site, with new two storey housing replacing views of the existing built form, albeit located nearer to the viewer. This level of enclosure would be enhanced by the additional tree planting identified in the Landscape General Arrangement Plans [CD1.13 and CD1.14] and the Supplementary Tree Planting Opportunities Plans [CD1.38 and CD1.39]. Upon partially maturity of the proposed vegetation, the new built form would not be readily perceptible in external views except along the site entrance at Victor Beamish Avenue. The well-vegetated, truncated nature of these views would be conserved.

4.3.20 There would be indirect effects on the character of the Appeal Site through the introduction of additional lighting and activity. Victor Beamish Avenue is currently a lit highway that is actively used by pedestrians and vehicles for access to the school, the aerodrome, the Royal Air Forces

Association Building on the north-eastern side of the Appeal Site and the parking bays for recreational walkers alongside the northern section of the western site boundary.

Grey Belt

- 4.3.21 Paragraph 148 of the NPPF [CD7.01] states that *“Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.”*
- 4.3.22 The glossary in Annex 2 of the NPPF defines ‘grey belt’ as *“For the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.”* Footnote 7 relates to *“habitats sites (and those sites listed in paragraph 189) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, 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 75); and areas at risk of flooding or coastal change.”*
- 4.3.23 I consider that the Appeal Site meets the NPPF definition of ‘grey belt’ in terms of its requirement for previously developed land and its limited contribution to the five Green Belt purposes (see Section 4.4 below). The Council accepts that the site is Grey Belt, as stated in Paragraph 9.1.2 of the Main Statement of Common Ground [CD11.01], but does not accept that the proposals will deliver necessary improvements to the local or national infrastructure.
- 4.3.24 Paragraph 159 of the NPPF [CD7.01] states *“The improvements to green spaces required as part of the Golden Rules should contribute positively to the landscape setting of the development, support nature recovery and meet local standards for green space provision where these exist in the development plan. Where no locally specific standards exist, development proposals should meet national standards relevant to the development (these include Natural England standards on accessible green space and urban greening factor and Green Flag criteria). Where land has been identified as having particular potential for habitat creation or nature recovery within Local Nature Recovery Strategies, proposals should contribute towards these outcomes.”*
- 4.3.25 Paragraph 1.3 of the OR states that one of the benefits of the Appeal Scheme is that it would provide *“a large area of publicly accessible open space”*. The Appeal Scheme would deliver

new, high quality greenspaces that are on the doorstep for new residents and are readily accessible to the wider public. The Landscape General Arrangement Plans [CD1.13 and CD1.14] provide multiple opportunities for residents and visitors to stroll through well-treed greenspaces. These start at the southern site boundary where a new footpath meanders eastwards through a greenspace that leads to the southern square and the edge of the school grounds. From here the recreational footpath passes alongside the school fencing and into an extensive linear greenspace along the eastern site boundary. This greenspace would comprise woodland with glades, which would accommodate children's play areas and seating. This meandering footpath would continue northwards to the northern site boundary where a new access would be provided to connect with the Kenley Airfield Heritage Trail around the aerodrome and on to the recreational resources of Kenley Common (LVIA Figure 1, CD1.17). The opportunity to stroll north-south through a series of linked greenspaces to access the aerodrome would be preferable to the alternative north-south route that involves walking along an off-site road adjacent to the northern section of the western site boundary.

4.3.26 As noted on Page 18 of the Surrey Design Guide [CD6.19], space in the public realm needs to be:

- Well-connected and accessible (Principles 2.1 and 6.1)
- Well defined and enclosed forming streets and places (Principle 2.2)
- Overlooked, safe and well used (Principle 5.3)
- Characterised by high quality materials and detail (Principles 2.4 and 3.2)
- Easy to navigate and interesting (Principle 2. 1)
- Linked to a network of open space (Principle 2.5)

4.3.27 The Appeal Scheme would be in accordance with these principles.

4.3.28 The framework of greenspaces would provide a positive contribution to the character and setting of the new built form in accordance with paragraph 159 of the NPPF. The well-treed internal greenspaces have been located and designed to harmoniously reflect building layouts (the linear avenue, courtyard, northern 'quadrangle' arrangements etc). They would also reflect the enclosure and scale of the buildings. Retained trees within the peripheral greenspaces would continue to provide their strong contribution to the verdant setting of the new built form and this contribution to character would be enhanced by additional tree planting identified in the Landscape General Arrangement Plans [CD1.13 and CD1.14] and the Supplementary Tree Planting Opportunities Plans [CD1.38 and CD1.39].

- 4.3.29 The proposed planting strategy would have a strong ‘ecological’ component with species selected for wildlife value. The Appeal Scheme would also provide for bird boxes, bat boxes, an invertebrate hotel, a beetle logger and a pollinator garden, as proposed in the Biodiversity and Ecology Strategy within the Landscape DAS. These measures would all make an important contribution to nature recovery.
- 4.3.30 As noted at Paragraph 7.151 of the OR, open space provision is considered to be adequate to meet policy requirements. 1.64 hectares (ha) of greenspaces would be provided, covering approximately 35% of the Appeal Site (including publicly accessible greenspaces and incidental greenspaces (e.g. belts of trees/shrubs/grass alongside roads that would be maintained by a private management company). The publicly accessible greenspace would occupy 0.88ha of this 4.74ha Appeal Site.
- 4.3.31 In summary, the Council accepts that the Appeal Site is Grey Belt as stated in Paragraph 9.1.2 of the Main Statement of Common Ground [CD11.01]. The Appeal Scheme would deliver new high quality greenspaces that are on the doorstep for new residents and are readily accessible to the wider public. As noted at Paragraph 7.151 of the OR, open space provision is considered to be adequate to meet policy requirements. The Appeal Scheme, would on the basis of the above, be in accordance with Paragraph 156 (c) of the NPPF

4.4 Effects on the Purposes of the Green Belt

- 4.4.1 Paragraph 153 of the NPPF requires Green Belt harm to be assessed and weighed (subject to Footnote 55) with regard to potential harm to the openness and purposes of the Green Belt, Previously Developed Land and Green Belt. Green Belt purposes also have relevance to the consideration of Grey Belt, the definition of which in Annex 2 of the NPPF includes land that “does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143”. The Council is right to accept that the Appeal Site is Grey Belt, as stated in Paragraph 9.1.2 of the Main Statement of Common Ground [CD11.01], based on the limited contribution of the Appeal Site to Green Belt purposes, as I have assessed below.

Purpose (a): ‘to check the unrestricted sprawl of large built up areas’

- 4.4.2 OR Paragraphs 7.17 to 7.18 set out how the Council is in agreement with the assessment in the Planning Statement [CD1.33] that the Appeal Site is considered to “make a “limited” contribution towards meeting purpose (a). Sprawl may be defined as the ‘spreading out of built form over a large area in an untidy or irregular way’ (Oxford English Dictionary). The Appeal Site is contained by (1) the existing settlement edge on its western and southern sides; (2)

woodland and housing along Salmon Lane on its eastern side; and by aerodrome buildings on its northern side. It has a strong sense of visual containment that contrasts with the open landscape of the aerodrome to the north (**Photograph 3**) and does not form part of any long distance views across the Green Belt from this relatively open landscape (**Photograph 2A**). The sense of containment of the Appeal Site is such that is likely to be perceived more as infill than sprawl. Most parts of the Appeal Site have a stronger relationship with the existing settlement than the wider countryside of the aerodrome to the north. The Appeal Site already contains built development (**Plate 8** above) and the central school building, the aerodrome sheds and the housing to the west and east impart urbanising influences on the Appeal Site. The Appeal Scheme would not extend built development any further north than the existing housing at Collard Close on its western side, thereby further reducing any sense of sprawl.

Purpose (b): 'to prevent neighbouring towns merging into one another'

- 4.4.3 OR Paragraph 7.18 notes how the Appeal Scheme would result in a reduction in the gap between Caterham-on-the-Hill and Whyteleafe but assesses that the Appeal Scheme would not significantly conflict with purpose b) as this reduction would be localised. This reduction in the width of the gap would be difficult to perceive at the western edge of Whyteleafe due to the enclosure of views of the proposed built form in both the winter and summer months by buildings and woodland in the retained corridor of Green Belt land and by retained and enhanced woodland in the eastern part of the Appeal Scheme (**Photographs 10, 11, 11A and 11B**). There would be no intervisibility between Whyteleafe and the expanded settlement and a strong sense of separation between the settlements would remain. There would also be no perception that the expanded settlement would be merging visually or physically with Kenley to the north. Views towards the Appeal Scheme from the northern edge of the aerodrome (**Photograph 3**, taken approximately 230m south of the Kenley settlement edge) are of a visually contained area of the Green Belt on the far side of the aerodrome and its southern sheds and to the side of the relatively close housing at Trueman Road. There would be no intervisibility between Kenley and the expanded settlement and a strong sense of separation between the settlements would remain.

Purpose (c): 'to assist in safeguarding the countryside from encroachment'

- 4.4.4 OR Paragraph 7.20 notes the judgement in the Planning Statement [CD1.33] that the Appeal Scheme "*will not erode the open countryside between Kenley ... and Caterham as there are extensive protection measures in place for the main airfield*" but assesses that the Appeal Scheme would clearly represent the further encroachment of built development into the open countryside, with resultant conflict with purpose c). However, it is important to note that the

Appeal Site exhibits only limited characteristics of open countryside as the centrally located school building (off-site), aerodrome buildings, Victor Beamish Avenue, areas of hard-standing and housing on the southern, eastern and western sides of the Appeal Site collectively have a strong urbanising influence on it. This urbanising development compromises Green Belt openness to a notable degree. Most parts of the Appeal Site have a stronger relationship with the existing settlement than the wider countryside of the aerodrome to the north due to the containment provided by sheds in the southern part of the aerodrome and by housing to the northwest. The woodland in the eastern part of the Appeal Site also provides a strong degree of containment and consequently separates the Appeal Site from the wider countryside to the east and northeast.

- 4.4.5 Whilst the Appeal Scheme would result in some harm to the Green Belt purposes of preventing encroachment upon the countryside, this harm would be mitigated by the master planning proposals and associated compensatory improvements to the Green Belt. Paragraph 150 of the NPPF requires that once Green Belts have been defined, local planning authorities “*should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity*”. The Appeal Scheme would deliver new, publicly-accessible GI, which would incorporate children’s play facilities and enhanced woodland, all of which would be available for use by both existing and future residents. The Appeal Scheme also provides the opportunity to deliver enhanced biodiversity, enhanced habitats and enhanced connectivity in the local landscape with new walking routes between the Appeal Site and the aerodrome to the north.

Purpose (d): ‘to preserve the setting and special character of historic towns’

- 4.4.6 The Appeal Site is not located within or in close proximity to a historic town. However, the Planning Statement [CD1.33] gives consideration is given to this purpose as the Appeal Site is located within a Conservation Area and in proximity of designated heritage assets. It considers that the Appeal Site in its current condition makes a moderate contribution to serving purpose (d). Paragraph 7.7 of the Council’s Statement of Case [CD10.01] states that the Appeal Site currently plays a role in supporting purpose (d) “*to some degree*”.
- 4.4.7 It is important to consider what elements or areas important to the Kenley Aerodrome Conservation Area would be affected by loss of openness arising from the Appeal Scheme. The submitted Heritage Statement [CD1.30] acknowledges some residual impact on the character and appearance of the conservation area arising from the introduction of new built form. However, as set out in the Heritage Statement, this is compensated by an overall enhancement

to the setting of the designated heritage assets. Key elements of the Appeal Scheme contribute positively to the conservation area, retaining and celebrating the character and appearance of the conservation area.

4.5 Summary of Effects on the Green Belt

Previously Developed Land

4.5.1 As noted in Paragraph 7.7 of the Main Statement of Common Ground [CD11.01], the Council's Green Belt Assessment Part 3 – Appendix 1 (2018) states that "*the site is previously developed land*". The previously developed nature of the land is evident from the presence of roads, structures, areas of hardstanding and the dilapidated workshop. Areas of hard-standing vary in size, some wide and expansive, others narrow and linear. They have not 'blended into the landscape' as they are readily noticeable. They remain clearly visible as hard-surfaces and are a prominent component of views for people walking through the Appeal Site or looking towards the Appeal Site.

4.5.2 The full extent of buildings and hardstanding (excluding ancillary features such as fencing and the base for a former flagpole in the far southern part of the Appeal Site) is identified on **Plate 8**. The combined total for hardstanding and the building footprint is 1.315ha (29.8%). It should also be noted that combined total for hardstanding and the building footprint for the One School Global site is 0.683ha.

Loss of Green Belt Spatial Openness

4.5.3 In spatial terms, significant harm to openness would be an inevitable consequence of developing the Appeal Site as there would be notable increases in both built form and hard-standing. The duration of the loss of spatial openness, arising from an expansion of the settlement, would be long-lasting and the new dwellings would bring related activity from its residents. The Appeal Scheme would deliver 1.64ha of publicly accessible and incidental greenspaces, covering approximately 35% of the Appeal Site.

Loss of Green Belt Visual Openness

4.5.4 The Appeal Site has a high degree of visual enclosure in terms of external views, it includes existing built form and hard-standing, it is subject to the urbanising influence of existing built form (both within and adjacent) and the urbanising elements are seen by relatively few receptors within or in very close proximity to the Appeal Site. Existing views obtained by people travelling

along Victor Beamish Avenue are either filtered or partially truncated by roadside trees (summer months) and security fencing.

- 4.5.5 The Appeal Scheme would result in a significant level of harm to Green Belt visual openness within the Appeal Site, which would be an inevitable consequence of the proposed development. The harm to visual openness is reduced in the context of (1) existing built form on the Appeal Site, in the school grounds and adjacent to the western, southern and eastern site boundaries; and (2) the enclosure provided by site periphery woodland. The extent of harm to visual openness outside the Appeal Site is highly limited in extent. For the viewing positions located to the south and southeast of the Appeal Site, the extent of harm to visual openness is also highly limited in degree due to the substantial enclosure of winter and summer views provided by existing trees and understorey shrubs within peripheral parts of the Appeal Site. Upon partial maturity of the proposed vegetation, the new built form would not be readily perceptible in external views except along the site entrance at Victor Beamish Avenue.
- 4.5.6 Overall, the Appeal Scheme would not cause substantial harm to the openness of the GB and so is not inappropriate development applying paragraph 154(g) of the NPPF [CD7.01].

Grey Belt

- 4.5.7 The Appeal Site meets the NPPF definition of 'grey belt' in terms of its requirement for previously developed land and its limited contribution to the five Green Belt purposes. The Council accepts that the site is Grey Belt, as stated in Paragraph 9.1.2 of the Main Statement of Common Ground [CD11.01], but does not accept that the proposals will deliver necessary improvements to the local or national infrastructure.
- 4.5.8 However, Paragraph 1.3 of the OR states that one of the benefits of the Appeal Scheme is that it would provide "a large area of publicly accessible open space". The Appeal Scheme would deliver new greenspaces that are on the doorstep for new residents and are readily accessible to the wider public. The framework of proposed greenspaces would provide a positive contribution to the character and setting of the new built form. Retained trees within the peripheral greenspaces would continue to provide their strong contribution to the verdant setting of the new built form and this contribution to character would be enhanced by additional tree planting. The Appeal Scheme would also provide an important contribution to nature recovery. 0.88ha of publicly accessible greenspace would be provided. As noted at Paragraph 7.151 of the OR, open space provision is considered to be adequate to meet policy requirements.

Effects on the Purposes of the Green Belt

Purpose (a): 'to check the unrestricted sprawl of large built up areas'

- 4.5.9 OR Paragraphs 7.17 to 7.18 set out how the Council is in agreement with the assessment in the Planning Statement [CD1.33] that the Appeal Site is considered to “make a “limited” contribution towards meeting purpose (a).

Purpose (b): 'to prevent neighbouring towns merging into one another'

- 4.5.10 OR Paragraph 7.18 notes how the Appeal Scheme would result in a reduction in the gap between Caterham-on-the-Hill and Whyteleafe but assesses that the Appeal Scheme would not significantly conflict with purpose b) as this reduction would be localised.

Purpose (c): 'to assist in safeguarding the countryside from encroachment'

- 4.5.11 OR Paragraph 7.20 notes the judgement in the Planning Statement [CD1.33] that the Appeal Scheme “*will not erode the open countryside between Kenley ... and Caterham as there are extensive protection measures in place for the main airfield*” but assesses that the Appeal Scheme would clearly represent the further encroachment of built development into the open countryside, with resultant conflict with purpose c). However, the Appeal Site exhibits only limited characteristics of open countryside. Existing urbanising development compromises Green Belt openness to a notable degree. Most parts of the Appeal Site have a stronger relationship with the existing settlement than the wider countryside of the aerodrome to the north due to the containment provided by sheds in the southern part of the aerodrome and by housing to the northwest. The woodland in the eastern part of the Appeal Site also provides a strong degree of containment and consequently separates the Appeal Site from the wider countryside to the east and northeast.

- 4.5.12 Whilst the Appeal Scheme would result in some harm to the Green Belt purposes of preventing encroachment upon the countryside, this harm would be mitigated by the master planning proposals and associated compensatory improvements to the Green Belt. The Appeal Scheme would deliver new, publicly-accessible GI and the opportunity to deliver enhanced biodiversity, enhanced habitats and enhanced connectivity in the local landscape with new walking routes between the Appeal Site and the aerodrome to the north. The Appeal Site is considered to “make a “limited” contribution towards meeting purpose (c).

Purpose (d): 'to preserve the setting and special character of historic towns'

- 4.5.13 The Appeal Site is not located within or in close proximity to a historic town. However, the Appeal Site is located within a Conservation Area and in proximity of designated heritage assets. The submitted Planning Statement considers that the Appeal Site in its current condition makes a moderate contribution to serving purpose (d).

4.6 Effects on the Character and Appearance of the Site and Wider Area

- 4.6.1 RfR 2 asserts, amongst other things, that the Appeal Scheme would result in “*significant harm to the character and appearance of the site, area and landscape.*” The Council’s Statement of Case provides little detail about what components of the Appeal Scheme are considered to result in harm.
- 4.6.2 The most obvious effect of the Appeal Scheme would be to transform the majority of the Appeal Site from being part of the countryside to part of the expanded settlement. Areas of roads, hardstanding, grassland, scrub, mature trees and a derelict workshop building would be developed for a new residential neighbourhood of up to 87 new residential units, roads and greenspaces. In perceptual terms, the Appeal Site would acquire a more suburban, developed and enclosed character, replacing its current predominantly open greenfield/partial brownfield appearance. The verdant character of the Appeal Site would be conserved.
- 4.6.3 There would be a high level of change to the physical resources, as would almost inevitably be the case when developing a site for new housing. There would be a net loss of greenspace (including areas in poor condition) but 1.64 ha of high quality greenspaces would be provided, covering approximately 35% of the Appeal Site (including publicly accessible greenspaces and incidental greenspaces). 0.88ha of this provision would be publicly accessible greenspace, serving as a valuable recreational resources for both new residents and people visiting the site from the surrounding areas. The greenspaces would incorporate measures to help achieve nature recovery and would be well managed in accordance with a landscape management plan. Connectivity in the local landscape would also be enhanced through provision of new recreational footpaths.
- 4.6.4 As set out in the Statement of Common Ground (Arboriculture) [CD11.02], the Appeal Scheme would retain 217 No. of the 341 No. existing Category A, B and C tree groups and individual trees. The proposed housing layout takes into account the Tree Protection Plan that has been prepared on the basis of the BS5837 Pre-Development Tree Condition Survey. Provision of supplementary native trees and shrubs would compensate for losses and would contribute to the vegetation framework for (1) integrating the proposed housing and open space into the local landscape and (2) providing distinctive setting and strong sense of place for the new residential

area. Paragraph 2.10 of the Statement of Common Ground (Arboriculture) also notes that at least 225 new trees could be accommodated on the Appeal site.

- 4.6.5 The northern part of the Appeal Scheme provides a sensitive design response to the historic aerodrome, emphasising historic visual linkages and restoring a physical link in terms of a new footpath connection. The southern part of the Appeal Scheme also provides a sensitive design response to the generally “unremarkable” landscape south of the school. The proposed layout provides for the retention of broad belts of peripheral greenspace, retains and enhances the historic tree line along Victor Beamish Avenue and creates a characterful arrangement of housing that reflects the regimented, military character of the wartime buildings that were present prior to demolition and the Appeal Site entering a long phase of disrepair. Terraced, detached and semi-detached buildings would be arranged in formal groups alongside a grid-like arrangement of internal roads, all set within a strong residential context provided by surrounding off-site housing to the west, south and east. Existing vegetation would be substantially retained and the verdant character of the site would be conserved.
- 4.6.6 Significant changes to landscapes do not necessarily equate to harm and there may be both beneficial and adverse components to change. The significant change that would arise to character and appearance of the Appeal Site must be considered in the current Grey Belt nature of the Appeal Site, its historic developed context and the character of the well-treed residential areas that surround the site on three sides. As noted at Paragraph 5.4 of the Guidelines for Landscape and Visual Impact Assessment [CD6.47], the aesthetic and perceptual aspects of a landscape must also be factored in to any consideration of landscape character. The Appeal Site contains a wide array of features that detract from the visual amenity of the site and the quality of the local landscape. The removal of the derelict workshop, dilapidated roads, unsightly areas of hard standing, piles of rubble, trees in poor condition and tall security fencing along both sides of Kenley Avenue would enhance the quality and appearance of the Appeal Site landscape and make it more welcoming for visitors. It may be expected that high quality buildings would be delivered through any Reserved Matters application. The character of Victor Beamish Avenue would be enhanced through retention of its roadside trees and removal of roadside security fencing. Other internal roads would be lined by attractive tree/shrub vegetation with area of amenity grassland. The off-site listed school building and associated playground trees would continue to provide contributions to the sense of time-depth and the verdant character of the site.
- 4.6.7 The pattern and grain of the proposed buildings would relate well with surrounding areas of off-site housing, including built development areas to the west and northwest (**Figure 2: Local Landscape Aerial Photograph** and **Plate 9**). The relatively high density of housing within the

northern part of the site would reflect the historically substantial amount of built form of varied scale in this part of the site. Building density in the southern part of the site would be lower density than that proposed to the north of the NAAFI in line with the former draft allocation HSG06. The historic domestic and military character of the southern part of the site would be re-established. Victor Beamish Avenue would be retained along its historic alignment, reflecting the underlying north-south arrangement of roads in the wider landscape.

- 4.6.8 The settlement edge would move further to the east by between 100 and 150m. It would move no further north than the existing northernmost protrusion at Trueman Road on the western side of the Appeal Site. The new settlement edge would have greater depth, variety and visual permeability than the existing settlement edge.



Plate 9: Urban Grain and Density Plan

- 4.6.9 The richly vegetated greenspace corridors adjacent to public roads (Salmons Lane West and Salmons Lane) would be retained and reinforced with supplementary tree planting with resultant

conservation of local landscape character. The Development would be well integrated within the local pattern of woodland and housing that characterises the peripheral areas of Caterham. The retained woodland within the eastern part of the site would, together with the contiguous belt of off-site woodland to the east, continue to provide separation between these two settlements.

4.6.10 Although the Appeal Scheme would provide a more suburban, developed and enclosed character, it would deliver a new high quality residential neighbourhood with a strong sense of time-depth, a strong sense of place and with conservation of the verdant character of the Appeal Site. There would be greater opportunities for people to appreciate the Appeal Site as it would deliver new, publicly accessible recreational resources and enhanced connectivity in the local landscape.

4.6.11 The retained and proposed trees would be located in and around the clusters of housing, as illustrated by the sketch diagrams in Section 7.4 of the Design and Access Statement [CD1.15]. Supplementary tree planting would also be provided within the greenspaces. It is likely that future residents would also plant trees in front and rear gardens. The design intent has been to:

- conserve the most valued trees;
- incorporate trees into the layout as focal points (e.g. the Category A trees forming the centre of the courtyard arrangement in the southern part of the site);
- using tree to help define spaces and vistas (e.g. along Victor Beamish Avenue and within the Northern Quadrangle where the proposed trees would help define the linear vista towards the airfield and proposed location for public art);

5.0 COMMENTARY ON REASON FOR REFUSAL 5

5.1 Introduction

5.1.1 RfR 5 asserts, amongst other things, that (1) the Appeal Scheme would result in the felling of a significant number of protected trees; (2) the indicative layout would not allow for the retention of existing trees that are important by virtue of their significance within the local landscape; and (3) the indicative layout would not appear to allow sufficient space for appropriate replacement planting.

5.1.2 Paragraph 7.22 of the Council's Statement of Case [CD10.01] states that the appeal proposal will result in significant tree loss and that the Council will put forward its case that this will result in an adverse impact both in terms of the character and appearance of the Conservation Area.

5.1.3 Paragraph 7.24 of the Council's Statement of Case refers to paragraph 136 of the NPPF [CD7.01], which states that (1) new streets should be tree-lined; (2) opportunities are taken to incorporate trees elsewhere in developments; (3) appropriate measures are in place to secure the long-term maintenance of newly planted trees; and (4) existing trees should be retained wherever possible. It also refers to Development Plan Policy DP7(13), which requires that (1) 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; and (2) 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.

5.1.4 Following discussions between the Council and the Appellants, it was agreed in the Statement of Common Ground (Arboriculture) [CD11.02] that there are no arboricultural matters in dispute. However, Paragraph 9.1.6 of the Main Statement of Common Ground [CD11.01] states that *"Regarding trees it remains an area of disagreement whether during the maturity of trees to be replanted there will be an unacceptable effect upon the character and appearance of the Conservation Area and/or an unacceptable impact upon the local landscape."*

5.2 Tree Removal and Retention

5.2.1 The Arboriculture Statement of Common Ground sets out the agreed position on proposed tree retention and removal. It identifies a total of 341 individual trees or groups of trees on the Appeal Site, comprising 7No. Category A (High quality); 83No. Category B (Moderate quality); and 251No. Category C (Low quality) trees.

- 5.2.2 It also identifies that a total of 124 trees would be removed to accommodate the Appeal Scheme, comprising 10No. Category B (Moderate quality) and 114No. Category C (Low quality) trees. The housing layout has been designed such that no Category A (High quality) trees would be removed, with the housing has been arranged around the cluster of Category A trees in the central southern part of the site.
- 5.2.3 Paragraph 2.11.1 of the Statement of Common Ground (Arboriculture) [CD11.02] states that the loss of the 124 trees is deemed acceptable in arboricultural terms. The original tree removal plan has been updated for the appeal hearing to take account of an amended layout that had been requested by the Tree Officer prior to determination of the planning application (Proposed Site Layout - Tree Removal, Dwg. No. 21125-P110 Rev. E) [CD1.11].
- 5.2.4 A total of 217 individual trees or groups of trees would therefore be retained, comprising 7No. Category A (High quality); 73No. Category B (Moderate quality); and 137No. Category C (Low quality) trees.
- 5.2.5 A new structure of trees has also been incorporated into the Appeal Scheme, reflecting guidance set out in the Council's Trees and Soft Landscaping Supplementary Planning Document [CD6.08]. 225 No. proposed trees are identified on the Kenley Campus Supplementary Tree Planting Opportunities Plans [CD1.38 and CD1.39]. Paragraph 2.11.2 of the Statement of Common Ground (Arboriculture) states that the proposed planting of a minimum of 225 new trees, as proposed in these plans, is deemed acceptable and agreed, and will be subject to detailed planting proposals, including the provision and layout of services and drainage being provided at Reserved Matters stage.
- 5.2.6 The existing and proposed tree framework provides for tree-lined streets and for well-treed greenspaces, as required under paragraph 136 of the NPPF [CD7.01] and Local Plan Detailed Policy DP7 (12) and (13). The long-term maintenance of newly planted trees would be undertaken in accordance with a Landscape Management Plan. Landscape General Arrangement Plans [CD1.13 and CD1.14] represent the landscaping scheme that, in accordance with Development Plan Policy DP7(13), makes provision for the retention of existing trees that are important in the local landscape (retention of all Category A trees and retention of 73 No. out of 83No. Category B trees) and identifies the existing trees that would be retained with sufficient space to grow to maturity, both above and below ground (through respecting root protection areas).

5.2.7 Projected tree canopy calculations based on the Proposed Site Layout - Tree Removal Plan [CD1.11] and Supplementary Tree Planting Opportunities Plans [CD1.38 and CD1.39] are provided in **Appendix B**. I calculate that it would take less than 30 years before the new tree stock achieves the same extent of canopy spread as the proposed tree removals based on a nominal proportion of approximately 17% 'small sized trees' and 87% 'medium to large' trees.

5.3 Effects of tree removal on the conservation area and landscape character

5.3.1 AIA Paragraph 1.4 notes that the Category C trees (1) have very little potential to contribute to local character because of their poor condition and small size; (2) are insignificant in the wider setting and (3) their loss will have no detrimental impact on local character. It also notes that (1) most of the significant boundary tree cover is being retained; (2) none of the lost trees are prominent as skyline features in the wider setting; (3) their loss will be noticeable in the immediate vicinity immediately after the development is completed, but the comprehensive new landscaping proposals will rapidly mitigate those losses and limit the impact on local character to the short term and in the immediate vicinity; and (4) there will be no adverse impact to local character in the wider setting in the long term. I agree with these conclusions.

5.3.2 OR Paragraph 7.127 sets out the following advice from the Council's Principal Tree Officer:

"... 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.

"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."

5.3.3 As noted above, there are now no arboricultural matters in dispute and the Council's case, as set out at Paragraph 9.1.6 of the Main Statement of Common Ground [CD11.01], is now that the unacceptable effect upon the character and appearance of the local landscape and/or Conservation Area is limited to the period when the replacement tree planting is maturing after the tree removals.

- 5.3.4 The assertion made by the Council’s Principal Tree Officer that the large number of lower quality tree losses would cumulatively have a very negative impact on the character of the conservation area is at odds with the advice from the Senior Historic Buildings Officer at Surrey County Council who judges that *“subject to the reserved matters being acceptable, I consider the scheme to result in an overall benefit to the conservation area”* (OR Paragraph 5.7).
- 5.3.5 The proof of evidence from Ms. Markham on heritage matters describes the historic changes to trees within the Appeal Site, noting how trees have grown and spread since 1940, with the result that the Appeal Site is less open (in terms of tree cover) than it was historically. Ms. Markham identifies that:
- the trees that contribute most to the historic character of the Site 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.
 - the contribution of other trees to the conservation area is a more general contribution to the character and appearance of the conservation area, rather than being of historic or design interest. It also depends on the quality of the trees, with Category A trees contributing the most and Category C trees contributing the least, if at all (including self-sown trees in the northern part of the Appeal Site).
- 5.3.6 Ms. Markham’s assessment of the effect of the tree proposals on the conservation area notes that the removal of existing trees is required in order to enable the redevelopment of the Site and that there would be a temporary period after tree removal when the contribution of trees to the conservation area would be reduced. Ms. Markham considers that (1) the visualisations reproduced in Appendix 2 of her proof demonstrate that even after 5 years the replacement trees would contribute positively to the character and appearance of the conservation area, and (2) this effect would increase over time. She does not consider that the temporary period while the new trees are reaching maturity would harm the conservation area as the Appeal Site would be redeveloped with well-designed housing and public realm in this same period, with resultant benefits to the conservation area as agreed by the Senior Historic Buildings Officer at Surrey County Council.
- 5.3.7 Ms. Markham considers that the contribution of trees to the conservation area would be enhanced because:
- The trees that were planted as part of the 1930s works to the aerodrome, which contribute most to the historic character of the Appeal Site, would be retained, and the replacement planting would reinforce them.

- High quality trees would be retained and the majority of trees proposed for removal are of low quality.
- The supplementary planting would result in a net gain in tree numbers and canopy spread.

5.3.8 The issues that have informed Ms. Markham’s assessment of effects on the conservation area also apply to my assessment of effects on the Appeal Site landscape and its character. The Appeal Scheme would result in both adverse and beneficial changes. The removal of the derelict workshop, dilapidated roads, piles of rubble, trees in poor condition and security fencing along both sides of Kenley Avenue would enhance the appearance of the Appeal Site. I do not accept that removal of the lower quality trees would cumulatively have a very negative impact on the landscape. It is the selective removal of the lower quality trees that would facilitate the restoration of the historic domestic and military character of the site through the introduction of new built development. There would clearly be a significant change to the character of the Appeal Site. This would also have been the position had the Council’s draft allocation HSG06 (included in the Withdrawn Our Local Plan 2033, CD6.01) been brought forward for development. This significant change would not arise from the loss of lower quality trees per se but from the distribution of new housing across the Appeal Site. The new built form would be interspersed amongst the higher quality trees. Careful consideration has been given to the contribution of retained trees to the character of the Appeal Site and wider landscape (e.g. the mature avenue trees along Victor Beamish Avenue, mature Category A trees forming the focus of the courtyard arrangement of housing in the southern part of the Appeal Site and the emphasis on the retention of mature trees in peripheral areas). New trees would also be provided alongside existing and proposed streets, as illustrated by the visualisations in Appendix 2 of Ms. Markham’s proof of evidence. The successful restoration of historic landscape character and the creation of a well-treed site landscape does not require the retention of the trees that would be removed from the Appeal Site, including the numbers of lower quality trees referred at OR Paragraph 7.127.

5.3.9 The design of the building layout around retained trees would have the effect of helping ensure that mature and partially mature trees provide an immediate contribution to the verdant character of streets and spaces.

5.3.10 The Appeal Scheme fully recognises the important contribution of peripheral trees to the wider landscape and valued views (e.g. the neighbourhood plan view towards the Appeal Site from Whyteleafe to the east). Supplementary tree/shrub vegetation would be provided in these peripheral areas, as identified on the Supplementary Tree Planting Opportunities Plans [CD1.38 and CD1.39]. The temporary loss of trees would have no or negligible effect on the wider landscape outside the Appeal Site.

- 5.3.11 As noted above, it would take less than 30 years before the new tree stock achieves the same extent of canopy spread as the proposed tree removals. However, it is important to emphasise that the replacement tree stock would make a strong contribution to the well-vegetated character of the Appeal Site long before the full replacement canopy spread is achieved. The proposed location of trees within the spaces defined by buildings will provide the trees within an enhanced visual presence and bring residents and visitors into close proximity with them. The location of trees within the proposed recreational greenspace and along footpaths and streets would also allow people to feel closer to nature.
- 5.3.12 I consider that the replacement trees would have a strong visual presence within 5 years, depending on their location and design intent. A set of visualisations have been produced by OSP Architecture to indicate the appearance of the trees identified on the Supplementary Tree Planting Opportunities Plans [CD1.38 and CD1.39] at years 5, 10 and 15 after the establishment of 'Extra Heavy Standard' size specimens (4.5m at time of planting). These are provided in Appendix 2 of Ms. Markham's proof of evidence. Tree heights have been modelled at 6m (Year 5); 8.5m (Year 10) and 11m (Year 15). The visualisations have been prepared on the basis of computer-generated perspectives with accurate modelling of tree and building heights, as indicated by the massing models on Pages 53-55 of the Design and Access Statement. The visualisations for the Southern Courtyard and Victor Beamish Avenue also illustrate the contribution that would be provided by retained trees to the well-treed streets associated with the Appeal Scheme. The Council has control of tree species, sizes and locations through the design approval process at any Reserved Matters application stage.



APPENDIX A

Site Appraisal and Site Context Photographs



Key

 Site Boundary

 Photographic Viewpoint Locations
 (A)

Notes

2023 Google Earth/Landsat/Copernicus

Scarp landscape architecture
 environmental planning

Client
 Proqram Limited

Project
 Kenley Campus, Caterham

Dwg Title
 Photographic Viewpoint Locations Plan (1)

Dwg No



NTS Sep. 2024

KENLEY CAMPUS, CATERHAM



Key

 Site Boundary

 Photographic Viewpoint Locations


Notes

2023 Google Earth/Landsat/Copernicus

Scarp landscape architecture
environmental planning

Client
Progarm Limited

Project
Kenley Campus, Caterham

Dwg Title
Photographic Viewpoint Locations Plan (2)

Dwg No

NTS Sep. 2024

KENLEY CAMPUS, CATERHAM



Photograph A
View looking south from southern section of Victor Beamish Avenue (Winter)

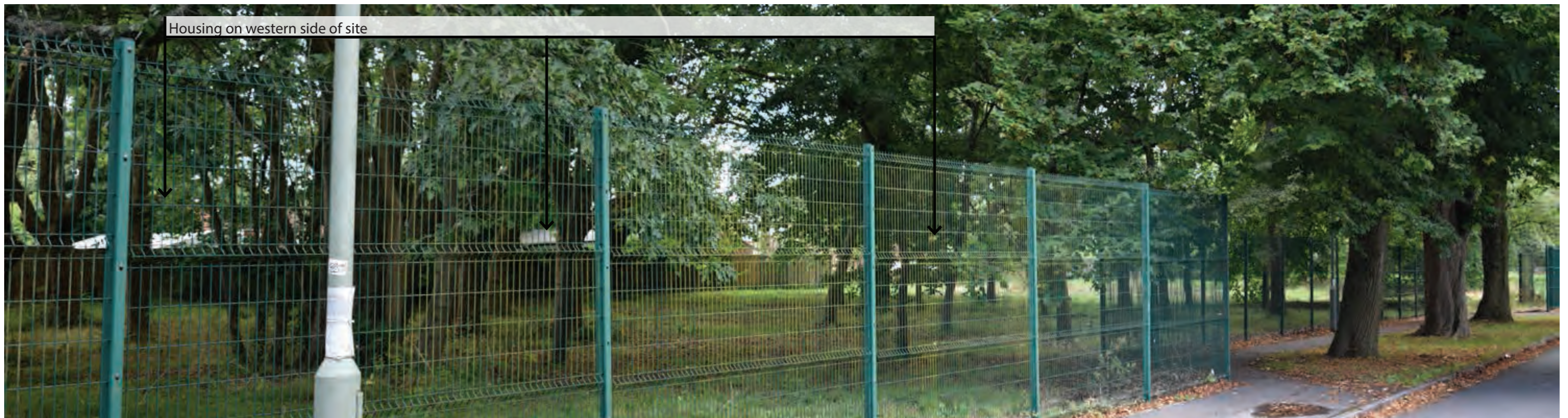


Photograph A
View looking south from southern section of Victor Beamish Avenue (Summer)



Photograph B

View looking northwest across site from southern section of Victor Beamish Avenue (Winter)



Photograph B

View looking northwest across site from southern section of Victor Beamish Avenue (Summer)



Photograph C
View looking across northeast across site from southern section of Victor Beamish Avenue (Winter)



Photograph C
View looking across northeast across site from southern section of Victor Beamish Avenue (Summer)



Photograph D
View looking north to school from southern edge of sports pitch (Winter)



Photograph E
View looking south across eastern part of site towards sports pitches (Winter)



Photograph F
View looking north towards airfield from track on eastern side of derelict workshops (Winter)



Photograph G
View looking north towards airfield from track on western side of derelict workshops (Winter)



Photograph H
View looking west across northern part of site (Winter)



Photograph 1
View looking south from northern section of Victor Beamish Avenue (Winter)



Photograph 1
View looking south from northern section of Victor Beamish Avenue (Summer)



Photograph J
View looking north along RAF Kenley access road (1) (Winter)



Photograph J
View looking north along RAF Kenley access road (1) (Summer)



Photograph K
View looking north along RAF Kenley access road (2) (Winter)



Photograph L
View looking south along RAF Kenley access road (Winter)



Photograph K
View looking north along RAF Kenley access road (2) (Summer)



Photograph L
View looking south along RAF Kenley access road (Summer)



Photograph M
View looking east along RAF Kenley access road (Winter)



Photograph N
View looking north across airfield (Winter)



Photograph M
View looking east along RAF Kenley access road (Summer)



Photograph N
View looking north across airfield (Summer)



Photograph O
View looking northeast towards RAF Kenley buildings (Winter)



Photograph O
View looking northeast towards RAF Kenley buildings (Summer)



Photograph P

View looking south towards school (former NAAFI building) from RAF Kenley access road (Winter)



Photograph P

View looking south towards school (former NAAFI building) from RAF Kenley access road (Summer)



Photograph Q
View looking west along RAF Kenley access road (Winter)



Photograph R
View looking north towards airfield on eastern side of RAF Kenley buildings (Winter)



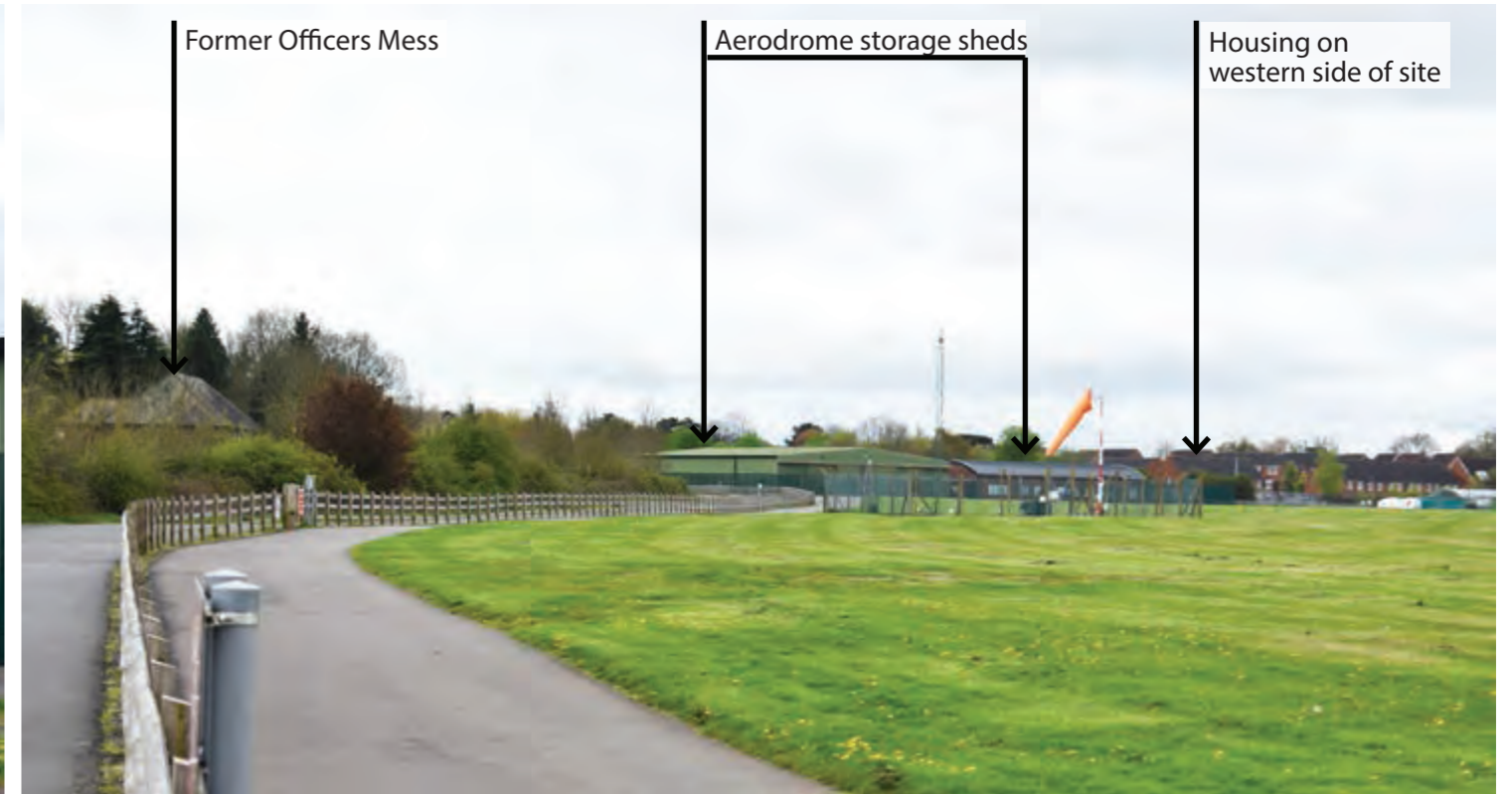
Photograph Q
View looking west along RAF Kenley access road (Summer)



Photograph R
View looking north towards airfield on eastern side of RAF Kenley buildings (Summer)



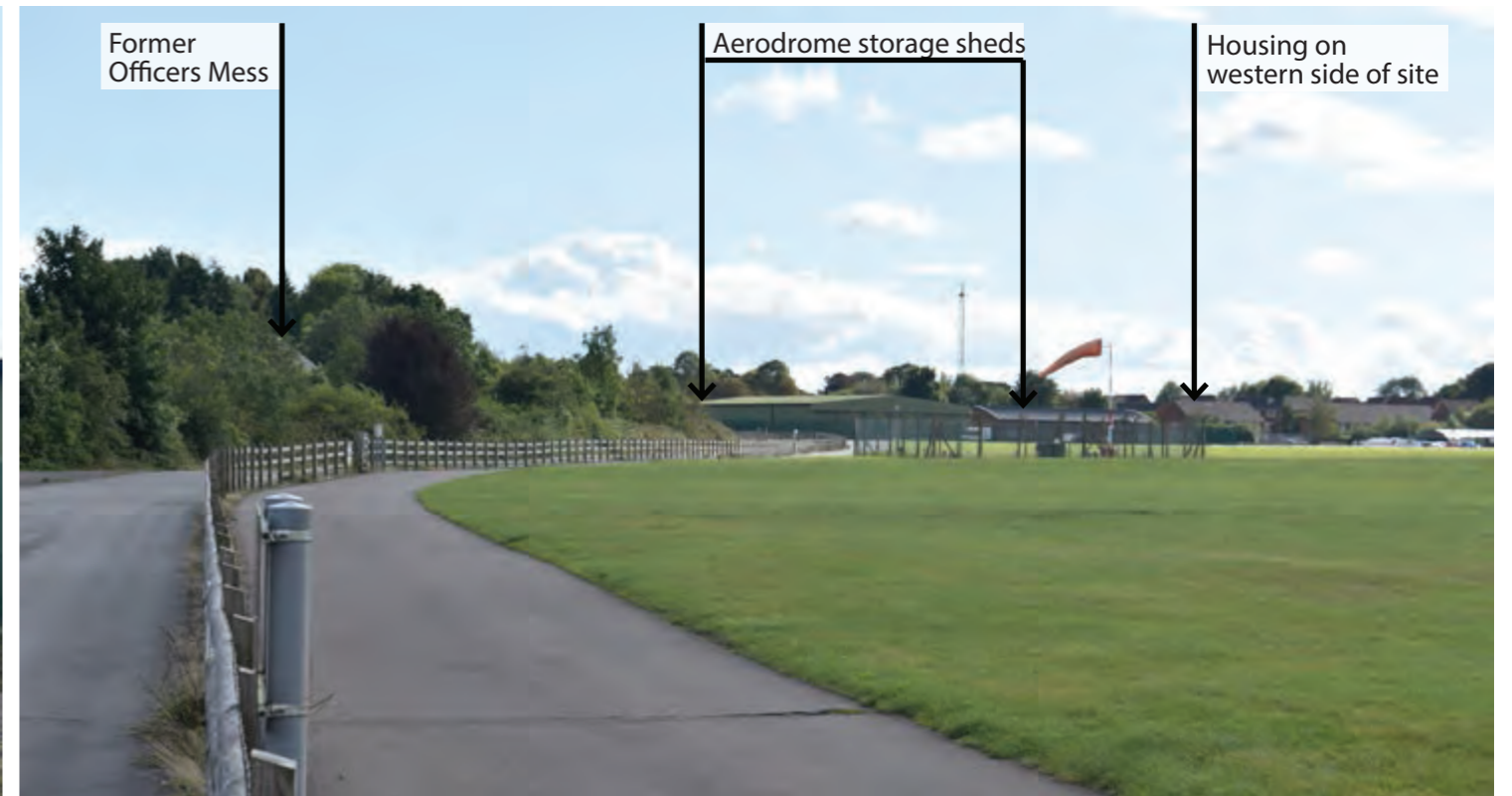
Photograph 1
View looking south towards site from airfield perimeter road (1) (Winter)



Photograph 2
View looking south towards site from airfield perimeter road (2) (Winter)



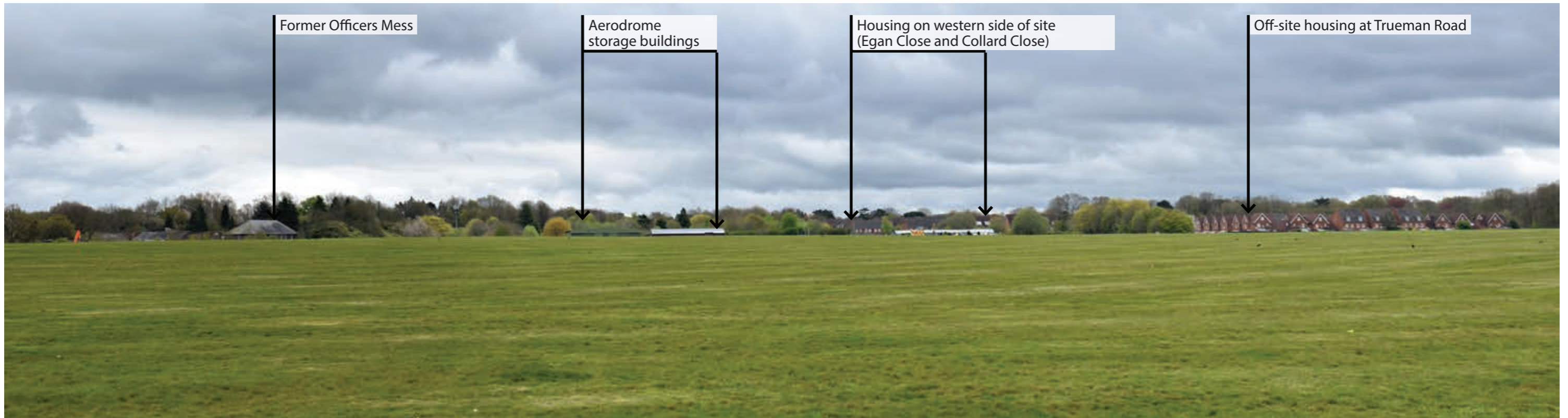
Photograph 1
View looking south towards site from airfield perimeter road (1) (Summer)



Photograph 2
View looking south towards site from airfield perimeter road (2) (Summer)



Photograph 2A
View looking northeast from aerodrome perimeter road (Summer)



Photograph 3
View looking south towards site from airfield perimeter road (3) (Winter)



Photograph 3
View looking south towards site from airfield perimeter road (3) (Summer)



Photograph 4
View looking east towards site from Collard Close/Halton Road junction (Winter)



Photograph 5
View looking east towards site from southern end of Halton Road (Winter)



Photograph 4
View looking east towards site from Collard Close/Halton Road junction (Summer)



Photograph 5
View looking east towards site from southern end of Halton Road (Summer)



Photograph 6
View looking northeast towards western part of site from Salmons Lane West (Winter)



Photograph 7
View looking northwest towards site entrance from Salmons Lane West (Winter)



Photograph 6
View looking northeast towards western part of site from Salmons Lane West (Summer)



Photograph 7
View looking northwest towards site entrance from Salmons Lane West (Summer)



Photograph 8

View looking north along Victor Beamish Avenue from Salmons Lane West (Winter)



Photograph 8

View looking north along Victor Beamish Avenue from Salmons Lane West (Summer)



Photograph 9

View looking north towards eastern part of site from Salmons Lane West (Winter)



Photograph 9

View looking north towards eastern part of site from Salmons Lane West (Summer)



Photograph 10

View looking northwest towards site from Whyteleafe Road/ Salmons Lane West junction (Winter)



Photograph 10

View looking northwest towards site from Whyteleafe Road/ Salmons Lane West junction (Summer)



Photograph 11
View looking west towards site from Whyteleafe Road (Winter)



Photograph 11
View looking west towards site from Whyteleafe Road (Summer)



Photograph 11A
View looking west towards site from Annes Walk (Winter)



Photograph 11B
View looking west towards site from Salmons Lane (upper eastern section) (Winter)



Photograph 11A
View looking west towards site from Annes Walk (Summer)



Photograph 11B
View looking west towards site from Salmons Lane (upper eastern section) (Summer)

APPENDIX B

Schedule of Indicative Tree Species and Projected Tree Canopy Calculations

Schedule of Indicative Tree Species and Projected Tree Canopy Calculations

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

LPA Reference: TA/2023/878

APPEAL REFERENCE: APP/M3645/W/24/3354498

Document No. 500221-TN-01

1.0 SCHEDULE OF INDICATIVE TREE SPECIES

1.1.1 Indicative species for small-scale and medium to large-scale trees are as follows:

SPECIES	COMMON NAME
Small Trees	
<i>Acer japonicum</i> 'Aconitifolium'	Downy Japanese maple 'Aconitifolium'
<i>Acer rubrum</i> 'Karpick'	Red Maple 'Karpick'
<i>Amelanchier</i> × <i>grandiflora</i> 'Ballerina'	Serviceberry 'Ballerina'
<i>Betula pendula</i> subsp. <i>pendula</i> 'Fastigiata'	Upright Birch
<i>Fagus sylvatica</i> 'Dawyck'	Dawyck beech
<i>Ilex aquifolium</i>	Common holly
<i>Koelreuteria paniculata</i> 'Fastigiata'	Pride of India 'Fastigiata'
<i>Malus sylvestris</i>	Crab apple
<i>Sorbus ulleungensis</i> 'Olympic Flame'	Ulleung Island rowan 'Olympic Flame'
Medium to Large Trees	
<i>Acer campestre</i>	Field Maple
<i>Acer platanoides</i> 'Drummondii'	Norway maple 'Drummondii'
<i>Acer rubrum</i> 'Brandywine'	Red maple 'Brandywine'
<i>Alnus glutinosa</i>	Common Alder
<i>Betula papyrifera</i> 'Saint George'	Paper Birch
<i>Betula pendula</i>	Silver Birch
<i>Carpinus betulus</i> 'Chartreuse'	Hornbeam
<i>Crataegus</i> × <i>lavalleyi</i> 'Carrierei'	Hybrid cockspur thorn 'Carrierei'
<i>Liquidambar styraciflua</i> 'Worplesdon'	Sweet Gum
<i>Magnolia</i> 'Galaxy'	Magnolia 'Galaxy'
<i>Prunus avium</i> 'Plena'	Double gean
<i>Prunus</i> 'Beni-yutaka'	Japanese Flowering Cherry
<i>Prunus padus</i>	Bird Cherry
<i>Prunus sargentii</i> 'Rancho'	Sargent's cherry 'Rancho'
<i>Pyrus calleryana</i> 'Chanticleer'	Callery Pear
<i>Quercus robur</i>	English oak
<i>Sorbus acuparia</i>	Rowan
<i>Tilia cordata</i> 'Streetwise'	Small-leaved lime 'Streetwise'

1.1.2 Tree selection at detailed design stage will consider the form and eventual scale of species in relation to sightlines, buildings, structures, areas of hard-standing and soil volumes. The detailed design proposals will also consider the technical principles provided by NJUG (National Joint Utilities Group) and NHBC (National House Building Council) with regard to planting trees in the vicinity of services and buildings. It should be noted that there are no restrictions on tree planting within the Kenley Aerodrome safeguarding area in the northern corner of the site (**Plate 1**) but, nevertheless, tree species selection within this zone will ensure that ultimate heights do not exceed those permitted for buildings.

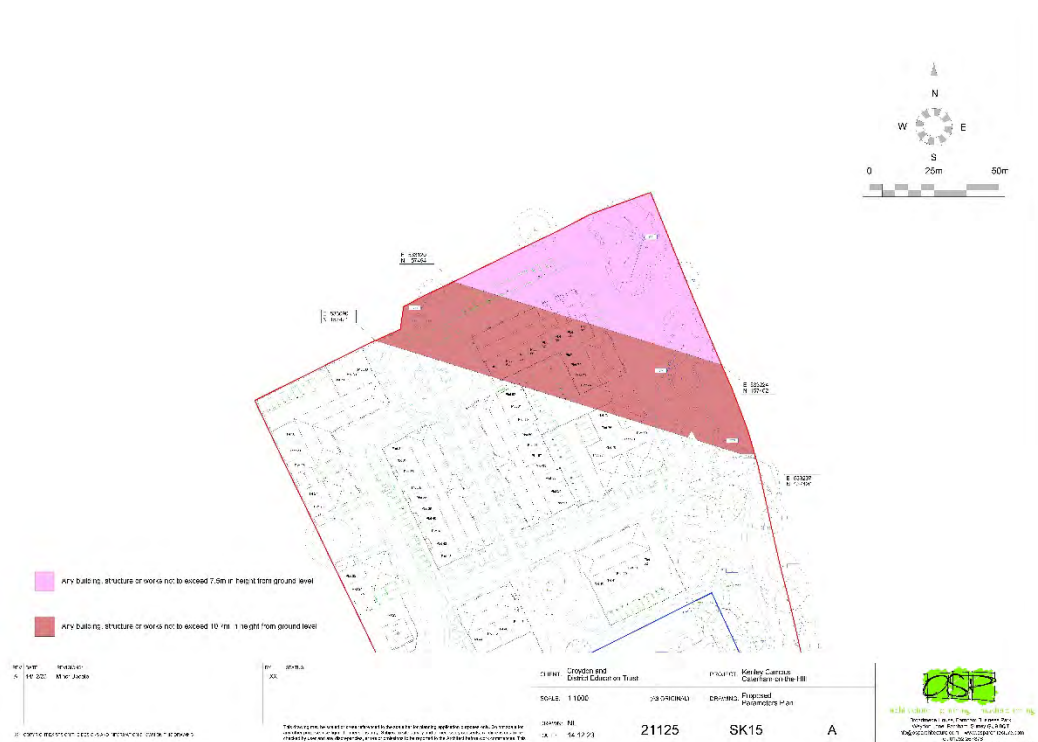


Plate 1: Extent of the Kenley Aerodrome safeguarding area

2.0 CALCULATIONS FOR REMOVED AND PROPOSED TREE CANOPIES

2.1.1 The Arboricultural Impact Assessment and Method Statement (Ref. 21174-AIA2-CA) identifies that a total of 124 No. individual trees or tree groups would be removed from the Appeal Site (10 No. Grade B Trees and 114 No. Grade C Trees) to accommodate the Appeal Scheme.

2.1.2 The canopy spreads of the proposed tree removals total 9,747.03m². This calculation uses the 'perimeter method' for measuring canopy areas, whereby the outer edges of individual trees and tree groups have been measured using AutoCAD software. Where any tree overhangs the red

line boundary, only the area of canopy inside the Appeal Site has been included. For Tree Groups G2, G6, G19, G21, G38, G111 and G133, only 2 or 3 stems of would be removed but, in each case, the whole tree group has been included in the calculation for canopy removal to reflect the tree removal plan with a resultant over-calculation of actual canopy loss.

- 2.1.3 **Table 1** identifies typical canopy spreads at Years 1, 10, 20 and 30 for both ‘small’ and ‘medium to large’ trees. It also provides the projected canopy spreads for a nominal 38 No. ‘small’ trees and 187 No. ‘medium to large’ trees, with size categories broadly reflecting the locations of the 154 No. trees shown on the Landscape GA Plans (Dwg. Nos. 2193-00-GF-DR-L-00100 2193_100A and 2193-00-GF-DR-L-00100 2193_101A) and the 71 No. trees shown on the Supplementary Tree Plans (Dwg. Nos. L-00200 and L-00201).
- 2.1.4 The total canopy area for the 225 no. replacement trees would be 9,880.02m² by Year 30. This exceeds the current canopy area for the proposed 124 no. tree removals (9,747.03m²). The proposed replacement trees would supplement the 217 No. retained trees, the canopies of which would continue to expand.
- 2.1.5 All retained and proposed trees would be managed to help ensure their healthy growth and their contribution to the character of the Appeal Site and surrounding landscape.

Table 1: Tree Canopy Projection Calculations

Tree Sizes	Typical Year 1 Canopy Spread/Area (m/m²)	Typical Year 10 Canopy Spread/Area (m/m²)	Typical Year 20 Canopy Spread/Area (m/m²)	Typical Year 30 Canopy Spread/Area (m/m²)	Proposed Tree Numbers	Total Year 1 Canopy Area (m²)	Total Year 10 Canopy Area (m²)	Total Year 20 Canopy Area (m²)	Total Year 30 Canopy Area (m²)
Small	0.75m/ 0.44m ²	2m/ 3.14m ²	3m/ 7.07m ²	4m/ 12.57m ²	38	16.72	119.32	268.66	477.66
Medium-large	1m / 0.78m ²	4m/ 12.57m ²	6m/ 28.28m ²	8m/ 50.28m ²	187	145.86	2,350.59	5,288.36	9,402.36
TOTAL CANOPY AREA FOR 225 No. REPLACEMENT TREES) =						162.58	2,469.91	5,557.02	9,880.02

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