

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

**PROOF OF EVIDENCE: HERITAGE**

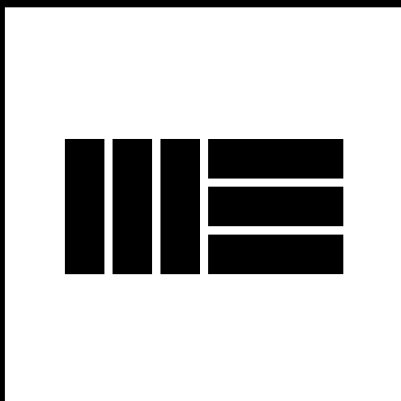
**APPELLANT: CROYDON AND DISTRICT  
EDUCATION TRUST**

**MS LUCY MARKHAM IHBC MRTPI**

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

**PINS REF: APP/M3645/W/24/3354498**

**FEBRUARY 2025**



# CONTENTS

1.0	HERITAGE EVIDENCE .....	3
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## APPENDICES

APPENDIX 1.0	SURREY COUNTY COUNCIL, CONSULTATION RESPONSE ON THE HISTORIC ENVIRONMENT, 1 FEBRUARY 2024
APPENDIX 2.0	VISUALISATIONS TO ILLUSTRATE THE APPEARANCE OF THE PROPOSED TREES AT 5, 10 AND 15 YEARS

# 1.0 HERITAGE EVIDENCE

## BACKGROUND AND SCOPE OF EVIDENCE

- 1.1 My name is Lucy Markham and I am a Partner in the Planning and Development Department at Montagu Evans. I am dual qualified as a Chartered Town Planner and a Member of the Institute of Historic Building Conservation. I have over twenty years' professional experience as a heritage specialist and hold postgraduate qualifications in building conservation, urban design and town planning.
- 1.2 I am appearing at this Inquiry on behalf of Croydon and District Education Trust ("the Appellant").
- 1.3 I was first approached by the Appellant in October 2021 to provide heritage consultancy services in relation to their emerging scheme at Kenley Aerodrome, Victor Beamish Avenue ("the Appeal Site" or "the Site"). Our instruction involved design advice on heritage matters and attendance at relevant pre-application meetings with Tandridge District Council ("the District Council"). The District Council does not employ conservation officers, but this expertise is provided by Surrey County Council ("the County Council"), so we also met with and responded to the feedback from the County Council's Historic Environment Planning team. I conducted site visits and oversaw the preparation of the Heritage Statement (CD.1.30) which was submitted with the application. I also oversaw the preparation of the Heritage Statement Addendum (CD.1.31), which provided an assessment of the proposals, which were revised in response to feedback from County Council on heritage matters.
- 1.4 Despite the positive consultation response from the Historic Environment Planning team of County Council, the application was refused on heritage grounds on 13 May 2024.
- 1.5 The sixth reason for refusal (RfR) stated that insufficient information had been provided to allow a full assessment of the potential harm to designated and non-designated heritage assets. The District Council has agreed that this reason could be removed with an appropriately worded condition. The agreed wording for this condition is as follows:
- "As part of any Reserved Matters application in respect of the development hereby approved a Heritage Design Statement should be submitted to and approved, in writing, by the local planning authority, in general accordance with the principles shown in relation to (i) connectivity (ii) arrangement of buildings along Victor Beamish Avenue (iii) reinstatement of historic paths (iv) location and nature of commemorative features on drawings numbered 21125-C05C (Access & Movement Diagram), 21125-C10B (Land Use Diagram), 21125-C104C (Coloured Site Layout) and on Figure 5.2 within the submitted Heritage Statement (June 2023). This Statement should detail the design quality, site appraisal and consideration of context for the development proposals and in particular should provide details of any proposed commemorative feature(s) and their location, the reinstatement of historic paths, the provision of better connectivity to the perimeter of the aerodrome, and the arrangement of buildings along Victor Beamish Avenue demonstrating how they reflect and respect the historic development of the site. The details provided should demonstrate a sensitivity to the site's visual and historical context in terms of massing, materials and detail, with carefully designed contemporary structures and carefully considered interpretations of traditional styles, using quality sustainable materials."*
- 1.6 The condition therefore secures the heritage benefits identified by the County Council, namely:
- Improved connectivity through the Site and between the listed former NAAFI and the aerodrome, including reinstatement of historic paths.
  - The proposed arrangement of buildings along Victor Beamish Avenue
  - The commemorative structure or feature to enhance the interpretation of the Site and wider aerodrome.
- 1.7 The fifth RfR related to the felling of trees and effect on trees in the CA. The Appellant has produced a Supplementary Tree Plan (drawing numbers 2193-00-GF-DR-L-00200 and 2193-00-GF-DR-L-00201) to show the location of 225 replacement trees. The District Council has agreed that this resolves their concerns with respect to the felling and replacement of trees and that there are no arboricultural matters in dispute.
- 1.8 The District Council requested some supplementary analysis of the effect of the tree proposals on the Kenley Aerodrome Conservation Area (CA), which I provided on 20 January 2025, which is reproduced and expanded across the relevant sections below.

- 1.9 The District Council consider that there would be an unacceptable effect on the character and appearance of the Conservation Area (CA) in the period after the trees are felled and before the new trees reach maturity. The District Council has agreed that their concerns about the effect of the CA in the long term have been resolved via the planning condition cited above.
- 1.10 Therefore my evidence on heritage matters focuses on the effect of the tree proposals on the CA. This is structured as follows:
- Paragraphs 1.20 to 1.23 consider the historic changes to trees on the Site.
  - Paragraphs 1.29 to 1.32 consider the contribution of trees to the CA.
  - Paragraphs 1.53 to 1.67 consider the effect of the proposals on the contribution of trees to the CA.
- 1.11 I also provide a summary of the assessment with respect to the other heritage assets to assist the Inspector given her statutory duty with respect to listed buildings and conservation areas, and in case heritage matters are raised by third parties at the public inquiry.

## **CONSULTATION RESPONSES**

### SURREY COUNTY COUNCIL – HISTORIC BUILDINGS OFFICER

- 1.12 As explained above, the District Council does not employ conservation officers, and as per other districts in the county, historic buildings advice is provided by the County Council.
- 1.13 The Appellant engaged with the County Council Historic Building's team at pre-application stage, and responded to their feedback prior to the submission of the application, and during determination.
- 1.14 Amendments were made to the design in response to their letter dated 7th September 2023. The changes included:
- a reduction in unit numbers from 87 to 80 residential units.
  - the removal of some units from the southern portion of the Site.
  - a reduction in overall site density, reorientation of building frontage across Plots 3-10.
  - improvements to overall site connectivity, including the introduction of a designated footpath linking the southern entrance to Salmons Lane West, running through the southern land parcel, to the east of the NAAFI and north towards the Airfield.
- 1.15 Surrey County Council's Senior Historic Buildings Officer concluded (in both his letters dated 7th September 2023 (CD.3.02) and 1st February 2024 (see **Appendix 1.0**) that:
- There was greater potential for change within the 'Northern Area' of the Site given very little is left of the former Airfield (aside from the Former Workshop).
  - The 'Northern Area' was 'one of the most well considered elements of the scheme', with the proposed view toward the NAAFI building a 'positive feature of the scheme'.
  - The demolition of the Former Workshop would cause harm to the conservation area and to the building itself, as a non-designated heritage asset. The harm identified to the conservation area should not be considered as 'substantial', owing to its dilapidated state.
  - Considered the potential to introduce a commemorative structure/ feature to the garden area a heritage benefit, though noting that a condition should be included on any decision notice securing the delivery of this element prior to any works being undertaken.
  - In regard to the 'Western Area', the proposals were 'well considered' and responded to concerns raised regarding alignment of buildings, with the buildings mostly reflecting the 'historical linear appearance of buildings which faced on to Victor Beamish Avenue'.
  - Considered the revised approach to the 'Southern Area' (including the removal of units to provide more open space, better connectivity through the site and the re-orientation of units 3-10 so they face Victor Beamish Avenue) responded to initial concerns and considered the residential units and improved interconnectivity has the potential to 'enhance the conservation area subject to reserved matters'.

- Concluded that there would be harm from the scheme from the loss of the Former Workshop and whilst the rest of the Site would significantly change from its current character and appearance, this did not necessarily equate to harm.
- Considered that the applicant had given careful consideration and thought to those elements which were significant, and the scheme was capable of delivering an overall benefit to the conservation area.

#### HISTORIC ENGLAND

- 1.16 Historic England is the statutory consultee on the historic environment, and does not wish to be consulted on the application, nor have they objected to it.

#### LONDON BOROUGH OF CROYDON

- 1.17 The London Borough of Croydon does not object to the proposed development. This is relevant to heritage given that the boundary between LB Croydon and the District Council is within the airfield, so is covered by two CA designations abutting one another. I understand from this that LB Croydon do not have any concerns about the effect on the Kenley Aerodrome CA.

#### **HISTORIC DEVELOPMENT**

- 1.18 Section 3 of the submitted Heritage Statement (CD.1.30) provides a detailed description of the historic development of the Site and surrounding area, including the wider aerodrome.

- 1.19 In summary:

- Kenley aerodrome was first developed in 1917 and used during World War One (WWI).
- Kenley was established as a fighter station in the early 1930s in preparation for World War Two (WWII); barrack blocks, officers and sergeant's messes, the NAAFI, stores and workshops were constructed in this period.
- In 1940 Kenley suffered air raids by Germany in the Battle of Britain.
- The RAF station closed in 1974, although a RAF glider school remained at the aerodrome.
- Many of the RAF buildings have now been demolished.
- The Officers Mess and a former workshop are derelict. The former workshop is within the Site.
- The former Institute (NAAFI) was converted into a school in 2015.

#### HISTORIC CHANGES TO TREES ON THE SITE

- 1.20 Given the District Council's concerns about the tree proposals, I have carried out some further analysis of how the tree cover has changed in the Site over time.

- 1.21 The WWI aerodrome did not appear to involve planting of new trees; aerial photographs reproduced at Figures 3.2 and 3.3 of the Heritage Statement show trees and hedgerows around the boundaries of the former fields, consistent with the 1867 OS map at Figure 3.1.

- 1.22 Trees were planted as part of the works in the early 1930s to establish Kenley solely as a fighter station, see the 1940s aerial photograph reproduced below as **Figure 1.1**. At this date there were fewer trees in the north of the Site. Trees had been planted around the southern, eastern and western sides of the parade ground and along the east side of Victor Beamish Avenue. There was also an avenue of trees flanking a footpath in the east of the Site. There were trees between the barrack blocks in the south of the Site in a less regimented layout, and larger than those around the parade ground, indicating they may have predated the barrack blocks. Other trees around the boundary may have pre-dated the aerodrome. **Figure 1.2** below is a historic photograph showing young trees along the southern edge of the parade ground.

- 1.23 Trees have grown and spread since 1940, so that the Site is less open (in terms of tree cover) than it was historically. This is evident when comparing the current aerial photograph at Figure 1.2 of the Heritage Statement and **Figure 1.1** below. The point is also illustrated in the aerial photographs reproduced at **Figure 1.3** below.



**Figure 1.1** Aerial Photograph showing barrack block accommodation to the south of Airfield, 1940s.



**Figure 1.2** Historic photograph showing young trees along the southern boundary of the parade ground with the Barrack buildings to the south, taken from Robin J Brooks: *Aerodromes of Fighter Command Then and Now* (2014), Page 173.



**Figure 1.3** Comparison of historic and 2014 aerial photo, *ibid*, Page 175.

## ASSESSMENT OF THE SIGNIFICANCE OF THE HERITAGE ASSETS

- 1.24 The Heritage Statement (CD.1.30) submitted with the application assesses the significance of the designated and non-designated heritage assets that have potential to be affected by the proposals. This is consistent with paragraph 207 of the 2024 NPPF, which requires applicants to do this.
- 1.25 Section 4 of the Heritage Statement provides an assessment of the significance of the heritage assets, applying Historic England’s guidance:
- GPA 2 – Managing Significance in Decision-Taking in Historic Environment (2015) (**CD.6.13**);
  - GPA 3 – The Setting of Heritage Assets (2017) (**CD.6.14**); and
  - Advice Note 12 Statements of Heritage Significance (2019) (**CD.6.15**).
- 1.26 The relevant heritage assets comprise:
- Kenley Aerodrome Conservation Area.
  - The former Dining Room and Institute, grade II listed.
  - The former workshops, a non-designated heritage asset.

### KENLEY AERODROME CONSERVATION AREA

- 1.27 The CA Statement (CD.6.07) states that the special reason for designating Kenley Aerodrome as a CA is the completeness of the remaining Battle of Britain airfield, which it identifies as being of national historic significance. The CA Statement divides the CA into three sub-character areas: ‘Sub-Area 1: Officers’ Mess Land’; ‘Sub-Area 2: Institute Building and former Parade Ground’; and ‘Sub-Area 3: Airfield and fighter pens’. The Site is located within Sub-Area 2: Institute Building and former Parade Ground.
- 1.28 Sub-Area 2 is of mixed character. The former NAAFI Building and former parade ground are recognisable elements of the former RAF base, albeit now in use as a school. The tree-lined Victor Beamish Avenue also survives from the 1930s phase of development. However, this part of the CA has lost many of the WWII aerodrome buildings. To the north of the former NAAFI, the CA is now characterised by large areas of hard standing, hard core and other material deposits, where buildings have been demolished, and the derelict former workshop. To the south of the former NAAFI was historically occupied by barrack blocks which have been demolished and now comprises greenspace associated with the school.

## CONTRIBUTION OF TREES TO THE KENLEY CA

- 1.29 The CA Statement (CD.6.07) contains the following references to trees relevant to the assessment:
- Section 1.3.1: The Canadian Forestry Corp felled trees and shrubs to establish the WWI airbase.
  - Section 1.3.3: Trees were removed from the north end of the runway and coppiced in the valley as a result of the 1939-40 works to the aerodrome.
  - Section 2.3: The surrounding trees are a key characteristic of the aerodrome. I assume this relates to the trees surrounding the airfield itself. The Council also recognise that works to trees are likely to be required as part of the management of the working aerodrome and maintenance of the common.
- 1.30 The CA Statement does not mention trees in the analysis of Sub area 2, nor their contribution to this part of the CA.
- 1.31 My assessment is that the trees that were planted as part of the 1930s works to the aerodrome contribute most to the historic character of the Site; these include the trees around the southern, eastern and western edges of the parade ground, along the east side of Victor Beamish Avenue, and forming an avenue along the footpath to the east of the Site.
- 1.32 The contribution of other trees to the CA varies depending on the quality of the trees, so the category A high quality trees contribute most, and category C, poor quality trees contribute least, if at all. The contribution of these other trees is also more a general contribution to the character and appearance of the CA, rather than being of special historic or design interest.

### **FORMER NAAFI BUILDING, GRADE II LISTED**

- 1.33 The grade II listed former NAAFI building was constructed between 1932 and 1934 to the design of the Air Ministry's Directorate of Works and Buildings. It is of a Neo-Classical style and character, with its design influenced by the Royal Fine Arts Commission. It is of two-storeys with a principal central range, flanked by pedimented short, returned wings, facing south. The building is constructed from brick with Portland stone detailing.
- 1.34 The former NAAFI is now in educational use as an independent Christian secondary school, occupied by OneSchool Global following the grant of planning permission and listed building consent in 2015 (application reference 2015/244 and 2015/799).
- 1.35 The former NAAFI holds a high degree of architectural interest for the pared back Neo-Georgian design. It is also of historic interest, as a remnant of the residential part of the RAF base, for its historic use as the principal dining rooms and social spaces for non-commissioned ranks at Kenley, and for its association with the wider airfield, which played a leading part in the Battle of Britain and subsequent offensive.
- 1.36 There is functional group value with the listed Officer's Mess and scheduled blast pens, which also form part of the airfield. There there is no visual relationship with these structures. The historic setting and experience of the NAAFI has seen a great deal of change, primarily through the removal of historic barrack buildings, hangars, and ancillary structures associated with the historic airfield. However, the relationship with the operational airfield to the north and the parade ground to the south remains an important aspect of its setting that contributes to the appreciation of its significance.

### FORMER WORKSHOPS, NON-DESIGNATED HERITAGE ASSET

- 1.37 The former Workshops are dated 1931 on a date stone set into the western wall: as such they are contemporaneous with the former Officers' Mess and NAAFI.
- 1.38 The structure comprises a roughly U-shaped building in brick, with a back range aligned east-west along the northern side, with projecting ranges aligned north-south at either end. The openings have concrete lintels, and the roofs are spanned with steel trusses. When built it was a functional structure without architectural embellishment.
- 1.39 The building is currently in a derelict, ruined state, and is significantly overgrown. It holds a degree of historic significance as a non-designated heritage asset, as a remaining building associated with the technical area of the airfield. Its significance has become harder to appreciate given its derelict condition and since most the other surrounding buildings have been demolished.



## **ASSESSMENT OF THE EFFECT OF THE PROPOSED DEVELOPMENT ON THE SIGNIFICANCE OF THE HERITAGE ASSETS**

- 1.40 Section 5 of the Heritage Statement (CD.1.30) provided an assessment of the effect of the proposals on the significance of the heritage asset. The Addendum Heritage Statement (CD.1.31) provided an assessment of the effect of the revised proposals on the significance of the heritage assets.

### DESIGN APPROACH AND MITIGATION MEASURES

- 1.41 The design has been informed by Montagu Evans thorough research into the history of the Site and has responded sensitively to the heritage context. I refer the Inspector to the DAS which explains this in more detail (CD.1.15), but I draw her attention to the following points:
- The masterplan is rectilinear in form which responds to the 'regimented' layout of the 1930s redesign.
  - The proposed location of buildings has also been informed by the historic footprints of buildings, most of which have now been demolished (see CD.1.15, p. 24).
  - A central north-south axis would connect the former NAAFI with the airfield.
  - The proposed buildings are 2-3 storeys, which is equivalent or lower in scale than the previous barracks on the south of the Site.
  - A new commemorative feature to the north of the Site would be secured under planning condition to reinforce interpretation of the historic interest of the aerodrome.
- 1.42 The design has been refined in an iterative process in response to feedback from the historic buildings' expert at the County Council as outlined at paragraph 1.15 above, who concluded that subject to reserved matters the proposals have potential to enhance the CA.

### EFFECT ON THE KENLEY AERODROME CONSERVATION AREA

- 1.43 There would be limited effect on the airfield or CA as a whole which remains relatively intact. The proposals only affect one part of the CA, and not the airfield itself which remains operational.
- 1.44 The adopted CA Statement anticipated development of the Site (CD.6.07, p. 20). The proposals would provide a beneficial new use for disused brownfield land within the CA.
- 1.45 The proposals would reintroduce homes to Site; there was barrack block accommodation to the south of the NAAFI, so there is a historic precedent for residential use in this part of the Site, albeit previously in RAF use.
- 1.46 The northern part of the Site is overgrown with high security fencing which limits access to the CA. The proposals would improve public access to the Site, where there is limited access currently, and only via Victor Beamish Avenue. The proposals would therefore increase public access to the CA.
- 1.47 Associated with this, the Access and Movement Diagram indicates that a number of new movement routes would be introduced through the Site, including main streets, lanes and footpaths. The proposals would therefore improve the permeability of the CA, and access to the airfield to the north, which would improve its character and the way it functions, as well as introducing beneficial movement and activity.
- 1.48 The proposals would re-establish the historic visual and functional connection between the listed former NAAFI Building and the aerodrome, with a central pedestrianised route in the northern part of the Site, to form a central, military-style boulevard. The parameter plans identify individual buildings rather than zones, so the location of buildings is essentially fixed. The Building Heights Diagram indicates that this central axis would be fronted by 3 storey buildings, to form 'barrack style' terraced houses.
- 1.49 This central axis continues to the south of the former NAAFI. The reorientation of houses in plots 3-10 to face Victor Beamish Avenue during determination improved the design, to form a positive relationship with this historic route into the aerodrome.
- 1.50 The effect of the demolition of the former workshop as a non-designated heritage asset is considered in more detail below. I agree with the County Council Historic Building Officer that when considered in isolation this would cause a degree of

harm to the CA, that this would be less than substantial. I consider that the harm to the CA as a whole would be at the very lowest end of the scale, given the dilapidated state of the building and because it was a small, ancillary structure, and not an important feature when the airfield was operational. The replacement of the workshop with a high quality residential development, which responds positively to the military heritage of the Site would improve the character and appearance of the CA.

1.51 Overall, I conclude that the proposals would result in an enhancement to the character and appearance of the CA, particularly when considering the following heritage benefits:

- The creation of the view and physical link between the former NAAFI Building and the airfield along a central axis.
- The reinstatement of the historical linear arrangement of buildings facing Victor Beamish Avenue.
- The reinstatement of historic footpaths (to be secured via planning condition).
- The creation of a commemorative structure/ feature (to be secured via planning condition).
- The reinforcement of the historic landscape design by planting of new trees on the west side of Victor Beamish Avenue, in a row to the south of the parade ground and to reinforce the avenue either side of the footpath to the north-east of the Site (to be secured via planning condition).

1.52 The County Council's historic building expert agrees that the proposals are capable of delivering an enhancement to the CA. Any such enhancement is of great weight in the planning balance. This is relevant to the statutory duty to give special attention to the desirability of preserving or enhancing the character or appearance of the CA (as set out at section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990). Paragraph 212 of the 2024 NPPF reflects the statutory provision and requires great weight to be given to the conservation of designated heritage assets.

#### EFFECT OF THE TREE PROPOSALS ON THE KENLEY AERODROME CONSERVATION AREA

1.53 The only point of disagreement with the Council relates to the effect of the tree proposals on the CA, specifically on the effect to the CA in the period when the new trees reach maturity. The Council's position seems irrational. They object to a temporary (alleged) harm to the CA that would deliver a permanent benefit to the CA. I do not consider this to be a valid rationale for refusing the application.

1.54 To explain my response, I provide some more detailed analysis of the effect of the tree proposals on the CA. This draws on the previous analysis of changes to tree cover within the Site over time, and the contribution of trees to the CA. In this section I consider:

- the existing quantum of trees within the Site and which trees would be removed, including reference to their quality;
- where trees would be replanted.
- the net effect on trees.
- the temporary effect on the CA after trees are removed and the new trees are reaching maturity.
- the permanent effect on the CA.

1.55 Mr Kirkpatrick of Scarp Landscape Architecture is acting as the Appellant's expert witness on character and appearance (landscape) matters. I have discussed the tree proposals with him, which has informed my assessment of the effect on the CA. The analysis is also illustrated by visualisations produced by OSP Architecture to indicate the appearance of the trees at 5, 10 and 15 years, reproduced in **Appendix 2.0**. Mr Kirkpatrick has advised on the height and width of the canopy of the trees at these dates.

1.56 There are currently 341 trees within the Site. All the category A (high quality) trees would be retained, as well as the trees along Victor Beamish Avenue, the woodland trees to the east and the category A trees in the central part of the Site. 10 category B trees of moderate quality would be removed. 114 category C trees, which are of poor quality, would be removed. 6 category U trees are in such poor condition that they have been assessed as needing removal for management reasons irrespective of any development proposals. Therefore the majority of trees that would be removed are poor quality.

1.57 All the trees that were planted as part of the 1930s works to the aerodrome, which contribute most to the historic character of the Site would be retained, including:

- those planted around the boundary of the parade ground (outside the red line boundary).
- those planted along the eastern side of Victor Beamish Avenue.

- those forming an avenue to the footpath to the east of the Site.
- 1.58 The majority of the trees that are to be removed are category C trees, and are of poor quality, so contribute least to the CA. These include self-sown trees in the north of the Site associated with the derelict workshop and cleared buildings.
- 1.59 The removal of these trees is required in order to enable the redevelopment of the Site, which the County Council concluded is capable of delivering an overall benefit to the CA. I agree. This point is at the heart of the irrationality of the District Council's decision.
- 1.60 Scarp Landscape Architecture have prepared a plan showing supplementary tree planting opportunities (drawing numbers 2193-00-GF-DR-L-00200 and 2193-00-GF-DR-L-00201). This indicates that additional trees could be planted in the following locations to reinforce the historic character of the CA:
- on the west side of Victor Beamish Avenue.
  - as a further row of trees to the south of the parade ground.
  - to the north-east of the former NAAFI, to reinforce the avenue either side of the footpath to the east.
  - to continue the avenue framing the footpath to the north-east of the Site.
- 1.61 Overall there would be a net gain of trees in the Site. Mr Kirkpatrick's analysis is that the canopy of the trees that would be removed equates to 9,747.03m<sup>2</sup>. Once the newly planted trees are fully established, in 30 years time, their total canopy would equate to 9,880.02m<sup>2</sup>, which exceeds the existing canopy area. Once the new trees are established the general contribution of trees to the character and appearance of the CA would be enhanced.
- 1.62 There would be a temporary period after the trees are felled before the new trees are established, when the contribution of trees to the CA would be reduced. The visualisations reproduced in **Appendix 2.0** illustrate that even after 5 years the new trees would contribute positively to the character and appearance of the CA, and this effect would increase over time. It is notable that the trees visible in the historic photograph of the parade ground in **Figure 1.2** below were relatively immature, but nevertheless contributed positively to the character of the airfield during WWII.
- 1.63 The size of the trees in the early years of the proposed development would indicate that the development was relatively new, in the same way that the newness of the buildings and public realm would be apparent; however, this is not in itself a negative effect, and a necessary consequence of a new development.
- 1.64 In the same period as the trees are planted the Site would be redeveloped with well-designed housing and public realm, which would deliver the majority of the benefits set out above. I therefore do not consider that the temporary period while the new trees reach maturity would harm the CA.
- 1.65 Notwithstanding this view, if the Inspector agrees with the Council that there would be some residual harm to the CA in the period until the trees reach full maturity, the level of harm would be marginal and very low. The temporariness of the effect and the fact that the effect would reduce as time progresses, is relevant to the weight the harm should be given. It is worth noting that both Environmental Impact Assessment and Historic England's GPA3 guidance (on setting) recognises that the permanence of the development is relevant to the assessment (CD.6.14, p 13). Short term effects are of less weight in the planning balance than permanent effects.
- 1.66 In the long term, once the new trees reach maturity, the contribution of trees to the CA 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 Site are being retained, and new planting will reinforce them.
  - The other high quality trees are being retained, and the majority of trees that are being removed are of low quality.
  - The supplementary planting would result in a net gain of trees and canopy. The supplementary planting could be secured via a planning condition or at Reserved Matters stage.
- 1.67 There is no formal guidance on how to balance short term with long term effects on designated heritage assets. EIA considers temporary construction effects, but it is generally the permanent effects in the operational scenario that are of most relevance to the planning decision. It is not common practice to consider temporary effects, such as construction effects or to consider the period when planting matures, in standard heritage assessments, outside EIA. In any event, the planning decision should be taken in the round, taking into account any harmful and beneficial effects, including whether these are temporary or permanent, giving most weight to the permanent effects.

## **EFFECT ON GRADE II LISTED FORMER NAAFI**

- 1.68 The effect on the listed former NAAFI is no longer a reason for refusal, and the District Council has agreed that a planning condition addresses their concerns. The historic building officer at the County Council did not identify harm to the listed building.
- 1.69 The special interest of the former NAAFI Building is primarily in its architectural design and historic fabric. The proposals will have no direct effect on the listed building, so will have no effect on these aspects of its significance.
- 1.70 Similarly the setting relationship with the former parade ground, now the school playground, to the south of the listed building, contributes most to the appreciation of its significance. The former parade ground is outside the red line boundary and will be entirely preserved.
- 1.71 The Site currently makes a limited contribution to the significance of the former NAAFI Building, and to the extent that it does it is related to the visual link with the airfield to the north, the historic site access via Victor Beamish Avenue and mature trees within the Site. These positive elements of the setting of the listed would be retained and reinforced in the proposed development.
- 1.72 The proposals would change the character of the land surrounding the listed building to introduce or reinstate a residential character. The proposed scale of buildings from 1 to 3 storeys would not compete with the listed building, which has a commanding presence and scale. The proposed layout of these buildings, which create a formal relationship with the listed building would reinforce its presence within the Site. The reinstatement of the visual and physical connection between the listed building and airfield would enhance the appreciation of the significance of the listed building as a former RAF building constructed as part of the aerodrome. Generally there would be increased public access to the streets and footpaths around the school, which would increase public appreciation of the listed building. The residents of the new houses may also send their children to the school which would sustain its use in the long term. Overall the proposals would enhance the appreciation of the significance of the listed former NAAFI Building.
- 1.73 The same analysis with respect to the effect of the tree proposals on the CA applies to the listed building, so I do not identify harmful effects to the listed building in respect of this.

## **EFFECT ON FORMER WORKSHOP, NON-DESIGNATED HERITAGE ASSET**

- 1.74 The historic building's officer at the County Council accepted the need demolish the former workshop in order to redevelop the Site. The District Council's concerns about the demolition of the workshop have been resolved through the planning condition set out above.
- 1.75 The workshop was originally a functional structure without architectural embellishment. It possesses a degree of historic significance as a building associated with the technical area of the airfield. Its significance has become harder to appreciate given its derelict condition and since most the other surrounding buildings have been demolished, so its significance is very low and at the local level.
- 1.76 The demolition of the former workshop would result in harm to the non-designated heritage asset. The harm is limited because the workshop is of very low significance. It is also beyond reasonable repair.
- 1.77 The removal of the workshop enables the redevelopment of the Site with a cohesive design for the north of the Site, responding to the military heritage of the Site.
- 1.78 I agree with the historic building's officer that the workshop should be recorded prior to demolition, so that its historic interest is retained as far as possible. This can be secured via planning condition, using the wording proposed by the County Council.

## **SIGNED AFFIRMATION**

- 1.79 I confirm that, insofar as the facts stated in my Proof of Evidence are within my own knowledge, I have made clear which they are and that I believe them to be true, and that the opinions I have expressed represent my true and complete professional opinion.

- 1.80 I confirm that my Proof of Evidence includes all facts which I regard as being relevant to the opinions that I have expressed and that attention has been drawn to any matter which would affect the validity of those opinions.
- 1.81 I confirm that my duty to the Inspector and the Secretary of State as an expert witness overrides any duty to those instructing or paying me, that I have understood this duty and complied with it in giving my Evidence impartially and objectively, and that I will continue to comply with that duty as required.
- 1.82 I confirm that I am neither instructed, nor paid, under any conditional fee arrangement by the appellant.
- 1.83 I confirm that I have no conflicts of interest of any kind other than any already disclosed in my Proof of Evidence.
- 1.84 I confirm that my Proof of Evidence complies with the requirements of the Royal Town Planning Institute, as set down in the Ethics and Professional Standards Advice for RTPI Members (2017).

L, 2

**Lucy Markham, Partner IHBC MRTPI**

**Montagu Evans LLP**

**Address:** 70 St Mary Axe, London EC3A 8BE

**Date:** 4 February 2025

# **APPENDIX 1.0**

**SURREY COUNTY COUNCIL, CONSULTATION RESPONSE  
ON THE HISTORIC ENVIRONMENT, 1 FEBRUARY 2024**



**From:** Christopher Reynolds <Christopher.Reynolds@surreycc.gov.uk>  
**Sent:** 14 February 2024 18:22  
**To:** Peter Lee  
**Cc:** Statutory  
**Subject:** 2023/878 Kenley Aerodrome  
**Attachments:** 2023'878 Kenley Aerodrome, Victor Beamish Avenue (2).docx

Dear Peter,

Please find attached our revised comments on 2023/878 Kenley Aerodrome.

Kind regards,



**Chris Reynolds**  
**Senior Historic Buildings Officer**

Historic Environment Planning, Surrey County Council, Quadrant Court, 35 Guildford Road,  
Woking, GU22 7QQ

Tel: 07790 952958\*

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\*I have limited access to this phone so please email me in the first instance.

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**To:** Planning Department of Tandridge District Council

**From:** Historic Environment Planning: Historic Buildings

**Application Number:** TA/2023/878

**Date Consultation Received:** 01/02/2024



**Address:** Kenley Aerodrome, Victor Beamish Avenue, Caterham, Surrey, CR3 5FX

**Proposal:** Development of the site for 87 no. residential dwellings including 40% affordable housing, associated landscaping, amenity space and car parking (outline application all matters reserved aside from access) (Updated Design and Access Statement, Arboricultural Impact Assessment and Indicative Layout Plan reducing unit numbers received)

**Designation:** Grade II Listed Building and Conservation Area

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### Comments:

**Please note:** My understanding is that the number of residential units has now been changed. Please make sure you only grant permission for the correct number of units. A number of other drawings of the previous scheme are also live on the website, so please make sure you do not accidentally approve the wrong documents.

I have previously advised the following for this site [new NPPF paragraphs in square brackets]:

*The header shows that the historic environment considerations are the character and appearance of the conservation area and the setting of nearby listed buildings. Special regard has to be had to these matters in the determination of the application in accordance with sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.*

*The applicant has provided a heritage statement to meet the requirements of paragraph 194 [200] of the NPPF. In line with paragraph 195 [201] I have provided further comments below.*

*There are three built heritage assets which have the potential to be affected by this proposal. These are:*

- *Kenley Aerodrome Conservation Area*
- *The Grade II listed Former Dining Room and Institute at Former RAF Kenley (referred to as NAAFI Building henceforth)*
- *The non-designated Former Workshop Buildings*

### Conservation Area

*The application site forms part of RAF Kenley, described by Historic England as one of the most complete fighter airfields associated with the Battle of Britain to have survived. The site was historically common land which was later taken under the Defence of the Realm Act during the First World War. The site was used to service aircraft during the First World War, a usage which continued in the interwar period when the site was expanded. There is a 'Kenley Aerodrome Conservation Area Proposals Statement' (2006) adopted by both Croydon and Tandridge as a Supplementary Planning Document. The entire application site falls within Sub-Area 2 of the SPD.*

*Very little survives of the early phase of the airfield in the application site. The only identifying feature is Victor Beamish Avenue which runs northwards from Salmons Lane West and has remained*



constant throughout the site's time as an airfield. Hangar buildings were built to the north of the application site during this period but have now all been demolished or destroyed. Owing to the nature of these buildings as large structures erected purely for maintaining and storing aircraft, this area is currently a large open part of the site which few features indicating its former use. The most important aspects of this area are its association and link with the airfield (including the access road around this) and the Former Workshop Building, discussed below.

As part of this initial phase, troops were stationed in single storey huts to the south of the site. During the early 1930s the Air Ministry sought to expand its RAF aerodromes across the country. Between 1932 and 1934 a major phase of development took part at RAF Kenley and it is this which most strongly contributes to the character and appearance of the conservation area today. New buildings were built in blocks to the south of the airfield including the NAAFI Building, Former Officers Mess, Former Workshop Buildings and barracks. During this time the Air Ministry consulted the Royal Fine Arts Commission and architects such as Edwin Lutyens, Reginald Blomfield and Giles Gilbert Scott had an influence on the final designs. While it is unknown who designed the landscaping of the site, it is clear that this was given detailed consideration from maps and aerial photographs shown in the statement of significance – I have included a photograph below so it is clear to what I am referring. This was very different to the plain layout of the single storey huts from the early airbase which did not have any of the paths, trees or planting which typified the 1930s redevelopment of the site. This landscaping is an important part of the conservation area's historic and architectural interest as are the communication routes throughout the site.

The area to the south was given the greatest consideration in terms of landscaping and consisted of a set of three barrack buildings which were between two or three storeys in height (it is unclear from aerial photographs). To its west the area was lined by a formal avenue of trees along Victor Beamish Avenue which were planted as part of the 1930s development. One of the barrack blocks faced directly toward Victor Beamish Road showing that views along this avenue were considered important and were designed to contribute to a sense of place on arrival. The remaining buildings were in alignment with this block with the intermediate space set out as lawns punctuated by trees and footpaths. A road ran to the north of these as a vehicular access route.

As part of this phase the NAAFI building and parade ground were constructed and were a central feature of this area. Both the building and parade ground have the same well considered landscaping with trees forming a soft boundary creating a largely self-contained site. Access between the barrack blocks and NAAFI building were via a set of paths to the east which functioned as a circulation route throughout the whole airfield. These footpaths provided access from the southern end of Victor Beamish Avenue all the way to the airfield and Officer's Mess to the north.

The area to the west of Victor Beamish Avenue was a more eclectic mix of buildings which instead had a much more formal linear appearance. The entrance to the site off Salmons Road West consisted of a pair of buildings and a gated entrance. Aerial photographs suggest these buildings were one to two storeys in height with shallow pitched roofs.

Overall, this formed a well-designed holistic scheme the open character, landscaping and layout of which gave the area a campus character for ordinary troops stationed at Kenley. As noted in the SPD, these aspects are still evident today and make a strong contribution toward the character and appearance of the Conservation Area as a well-designed scheme for a 1930s airbase. These areas must not be dismissed as being of no interest. The special historical and architectural interest of these areas as a former RAF base is particularly evident when compared to the former married quarters to the west of the site which were continually adapted, demolished and rebuilt during their time as part of airbase with very few features of note surviving in each iteration.

### **NAAFI Building**

The NAAFI building is Grade II listed and was a purpose built canteen and entertainment complex for the ordinary military service personnel. The 'back of house' kitchen and support services were housed in the single storey sections to the north either side of a central courtyard, while the dining

*halls and entertainment areas are those to the south and on the first floor. The appearance of different areas within the building indicate how they were used.*

*The building was constructed as part of the Air Ministry's expansion of the site between 1932-4. As noted above, the design of such buildings was influenced by the Royal Fine Arts Commission in keeping with other RAF bases around the country. For this reason, the list entry makes clear 'the careful proportions of this building reflect the impact of Air Ministry consultation with the Royal Fine Arts Commission.' The architectural and historic significance of this building includes its use as part of a Battle of Britain airfield, elevational appearance, scale, use of materials, plan form and clear separation of the different functions within the building.*

*The setting of the building is strongly influenced by its central position in front of the Parade Ground where its imposing appearance can be appreciated as well as its symmetry. As noted above, it was located as part of a careful and well considered landscape design which allowed troops to circulate around the site along footpaths and also along Victor Beamish Avenue.*

### **Former Workshops**

*The Former Workshop Buildings to the north are an undesignated heritage asset which were used historically as a machine shop and carpenter's workshop. The building did not have the same landscaped surroundings as the former barrack blocks with the exception of a tree lined avenue to the east which formed part of the circulation routes throughout the whole airfield. Aerial photographs and maps show the building dates from the alterations to the airbase in the 1930s.*

*The building has limited architectural interest but is of some historic interest as evidence of the former use of RAF Kenley. It makes a positive contribution to the character and appearance of the conservation area as evidence of the use of the site and its layout. Such a contribution is limited as the building is derelict.*

*I am not aware that Tandridge have made any commitment toward the restoration of this building either as part of the local plan or part of the Kenley Aerodrome Conservation Area Proposals Statement, although it does say it is a priority to reconstruct the building. Since the publication of this document, the building has clearly further deteriorated.*



*Figure 1: 1961 Aerial photograph of RAF Kenley showing the arrangement of buildings, open spaces, trees, roads and paths.*



*Figure 2: 1960s Aerial photograph of RAF Kenley showing the arrangement of buildings, open spaces, trees, roads and paths.*

### **Previous Comments**

As part of my previous comments, I noted that the local plan could be withdrawn, but still gave consideration to the draft allocation for 75 houses. Throughout my comments I stressed that the number of units within the previous scheme was too high (87) and as such the character and appearance of the conservation area was suffering as a result. Key elements I raised concerns about included the open space to the south of the designation, the circulation routes throughout the entire site, overdevelopment and the alignment of the houses along Victor Beamish Avenue. The applicant has sought to respond to these elements as part of the revised scheme.

My understanding is that the local plan is in the process of being dismissed. Ultimately, this is a matter for the Planning Officer to consider in the overall determination of this application. From my point of view, I still need to assess the application in accordance with the relevant paragraphs of the NPPF and local policy. As noted last time, this includes paragraph 211 of the NPPF which makes very clear that local planning authorities should look for opportunities for new development within conservation areas to enhance or better reveal their significance. In essence, just because a site may be a conservation area, it does not mean that parts of it cannot be redeveloped in a way which better reveals its significance.

### **General Comments**

The scheme before us has all matters reserved except the fact it is for 80 houses and the access has been provided. The applicant and I have engaged in a lot of pre-application discussion to establish the significance of the site and identify those elements which are important for preserving and enhancing its significance. I am content that the applicant has in principle responded to many of the points I have raised.

Owing to the nature of the application, the applicant will still need to submit details for the appearance, access, landscaping, layout and scale of buildings on the site. As such, I have only taken into account here those matters which specifically relate to the access of the site and the number of dwellings. I have split my comments into the northern area (the area immediately to the north of the NAAFI building), the western area (the units to the west of Victor Beamish Road) and the southern area (the units to the south of the NAAFI building).

### **Northern Area**

Aside from the Former Workshop (discussed below) there is very little left of this part of the site and as a result there is greater potential for change, provided this change fits in with the overall landscaping of the site. Being able to understand its relationship with the airfield as well as the link with the southern and western areas are highly desirable elements. For the scheme to succeed it is vital that the northern area be understood as relating to and be accessible from the airfield itself and some of the buildings toward the north of the site should have principal elevations facing toward the airfield. These matters should be taken into account as part of the reserved matters.

The scheme will lead to the loss of the undesignated Former Workshop Building. A building recording condition to level 3 which will be needed to interpret the structure, provide drawings of its layout and elevations and photographs of the building as a whole as well as any specific features of note in line with paragraph 211 of the NPPF. In terms of the impact of its demolition, this should be considered harm to an undesignated heritage asset through its total demolition and harm to the conservation area from the loss of a building which makes a positive contribution to understanding its historic interest. It should be noted that even though the building makes a positive contribution to the conservation area, its loss should not be considered substantial harm because of its dilapidated state as I have set out above.

The heritage statement makes note of the fact the garden area to the north has the 'potential to accommodate commemorative features, artwork and /or sculpture, in response to the site's history and its contribution to World War II.' I would consider this to be a heritage benefit, but at present cannot find it on any of the drawings and am not convinced it would be enforceable should the applicant decide not to proceed with this element. I have suggested a condition below which I would encourage you to discuss with the applicant.

### **Western Area**

The proposals for the western area of the site are well considered and have responded to concerns I raised about the alignment of buildings in this location. As can be seen in figures 1 and 2 the buildings mostly reflect the historic linear appearance of the buildings which faced directly on to Victor Beamish Avenue. I am little disappointed that two of the houses will not directly face Victor Beamish Avenue (18 and 19) but I consider this preferable to a previous scheme I saw for the site. I only wish to note here that the applicant has responded to my concerns. I will have to consider the design of these buildings as part of the reserved matters stage.

### **Southern Area**

Historically, this was an open landscaped area with accommodation in three barrack blocks. As a result, the well landscaped space around these had an open communal use for troops to make use of while resting with footpaths connecting all of the area with the airfield to the north. The aerial photographs also show that one of the barrack blocks faced directly on to Victor Beamish Avenue to create a sense of place. Any building on Victor Beamish Avenue should have its principal elevation facing the highway owing to its status as a gateway for the wider airfield. There should also be good connectivity throughout the area with the rest of the airbase.

Since the previous scheme this element of the proposal has improved significantly. Key changes include the removal of units to provide more open space, better connectivity through the site and the re-orientation of units 3-10 so they face directly onto Victor Beamish Avenue. I am pleased to say that this has responded to the points I raised in my initial consultation response. I consider that the proposed residential units and improved interconnectivity of the site has the potential to enhance the conservation area, subject to reserved matters.

### **Overall Balance and Reserved Matters**

As outlined above, there will be harm from the scheme from the loss of the Former Workshop Buildings. While the rest of the site will quite significantly change from its current character and appearance, I am not of the opinion that this will necessarily equate to harm. This is because only

elements of the character and appearance of the site reveal its historic or architectural interest. Ultimately, the applicant has given careful thought and consideration to those elements highlighted as being significant.

On balance, I consider that the arrangement of the buildings along Victor Beamish Avenue and the improved connectivity throughout the site will be an improvement. There will also be a benefit from the proposed new sculpture to the north of the site. Subject to the reserved matters being acceptable, I consider the scheme to result in an overall benefit to the conservation area.

The following will need careful consideration at the reserved matters stage:

- I am keen to see careful thought and attention given to the materiality of the paths around the conservation area. These are a vital element of the character of the area showing it as being one former airbase. I would not object to the central avenue being block paving should you feel it needs to be differentiated from the rest of the site.
- The driveway for Plot 13 may prove a little tricky in terms of the footpath going past the building. I am quite keen not to see a boundary fence put up all the way along the path. You may prefer to change the access to run between Plot 12 and 14 if it proves an issue.
- As stated previously, I have no issues with Plots 3-10 being 3 storey as per the original barrack buildings if it improves the viability of the site.
- I would like to see details of the proposed gates to the courtyard parking for plots 53-80. I would anticipate these being not overly decorative.
- The connectivity between the north of the site and the airfield is key to enhance the conservation area as a whole. I would encourage you to give this thought in terms of landscaping.
- Conversely, I would quite like to see spaces 67-73 hidden behind a low lying hedge, if possible, when viewed from the airfield.
- You may wish to raise the proposed sculpture with the Kenley Revival project. Some interpretation here would be welcome as well.
- Exposed brick and slate are particularly welcome as materials for this site as a whole. A further condition may be applied asking for samples should it not be clear what is being proposed.
- Should casement windows be proposed, these should have even sightlines. I would prefer top hung sash units to be avoided.
- I would support a sign at the entrance to the site welcoming people to the former airbase, although I am not sure how achievable this would be in reality.

## Conditions

At present, quite significant elements of the proposal are reserved so there are only limited conditions which should be applied. I have spoken to the applicant about these before and would suggest:

1. Prior to the commencement of the works, a scheme for the recording of existing architectural and historic features affected by the works shall be submitted to and approved in writing by the Local Planning Authority. This shall include a record of the Former Workshop Building to level 3 of *Understanding Historic Buildings* and a photographic record of the entire site. The scheme shall thereafter be implemented as approved.

Reason: The Local Planning Authority is satisfied that it is fundamental to the development permitted to address this issue before development commences and that without this safeguard planning permission should not be granted, and to record the architectural and historic fabric of the building in accordance with the advice of paragraph 211 of the National Planning Policy Framework.

2. Prior to the commencement of works, details of the commemorative feature, artwork and /or sculpture; a timescale for their implementation; and their proposed locations shall be submitted

and approved in writing Local Planning Authority. The scheme shall thereafter be implemented as approved.

Reason: To ensure that the development hereby permitted is not occupied until the specified operations have been completed in the interests of the amenities of the area.

I have assessed this application in line with paragraphs 201 and 205 of the NPPF. Subject to the reserved matters, I am of the opinion that the scheme overall will result in a benefit to the conservation area owing to the proposed commemorative feature, reinstatement of paths, better connectivity with the airfield and the arrangement of buildings along Victor Beamish Avenue. Such a benefit is modest and this will need to be taken into account with regard to other matters raised by consultees.

---

**Signed:** Christopher Reynolds, Historic Buildings Officer  
**File Ref:** 32/10/655

**Date:** 14/02/2024

# **APPENDIX 2.0**

**VISUALISATIONS TO ILLUSTRATE THE APPEARANCE OF  
THE PROPOSED TREES AT 5, 10 AND 15 YEARS**



Proposed trees shown at 5 years of growth - 6m predicted height



Northern Quadrangle Perspective - 5 Year Tree Growth  
Kenley Campus

**21125 / SK18A**

Scale 1:NTS @ A3 January 2025





Proposed trees shown at 10 years of growth - 8.5m predicted height



Northern Quadrangle Perspective - 10 Year Tree Growth  
Kenley Campus

**21125 / SK19A**

Scale 1:NTS @ A3 January 2025



Proposed trees shown at 15 years of growth - 11m predicted height



Northern Quadrangle Perspective - 15 Year Tree Growth  
Kenley Campus

**21125 / SK20A**

Scale 1:NTS @ A3 January 2025



Proposed trees shown at 5 years of growth - 6m predicted height



Southern Courtyard Perspective - 5 Year Tree Growth  
Kenley Campus

**21125 / SK21A**

Scale 1:NTS @ A3 January 2025



Proposed trees shown at 10 years of growth - 8.5m predicted height



Southern Courtyard Perspective - 10 Year Tree Growth  
Kenley Campus

**21125 / SK22A**

Scale 1:NTS @ A3 January 2025



Proposed trees shown at 15 years of growth - 11m predicted height



Southern Courtyard Perspective - 15 Year Tree Growth  
Kenley Campus

**21125 / SK23A**

Scale 1:NTS @ A3 January 2025



Proposed trees shown at 5 years of growth - 6m predicted height



Victor Beamish Avenue Perspective - 5 Year Tree Growth  
Kenley Campus

**21125 / SK24A**

Scale 1:NTS @ A3 January 2025



Proposed trees shown at 10 years of growth - 8.5m predicted height



Victor Beamish Avenue Perspective - 10 Year Tree Growth  
Kenley Campus

**21125 / SK25A**

Scale 1:NTS @ A3 January 2025



Proposed trees shown at 15 years of growth - 11m predicted height



Victor Beamish Avenue Perspective - 15 Year Tree Growth  
Kenley Campus

**21125 / SK26A**

Scale 1:NTS @ A3 January 2025

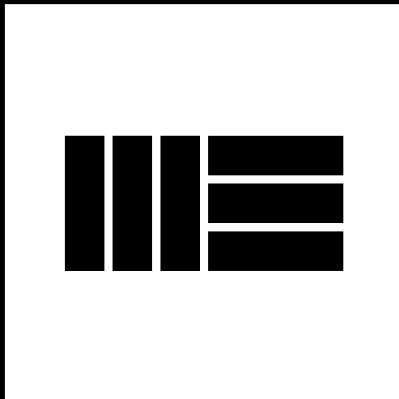


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