

# KENLEY CAMPUS, CATERHAM, CR3 5FX HERITAGE STATEMENT ADDENDUM



## PREPARED BY

Montagu Evans LLP

## FOR

Montagu Evans LLP

## DATE

January 2024

## PURPOSE

Addendum report following revisions to proposals at Kenley Campus, Caterham, CR3 5FX (Planning Ref. TA/2023/878)

---

## INTRODUCTION

- 1.1 Montagu Evans LLP has prepared this report on behalf of the Croydon and District Education Trust (the 'Applicant'), in support of revised development proposals which are subject to a live application for Outline Planning Permission at Kenley Campus, Caterham, CR3 5FX (also referred to throughout this report as the 'Site').
- 1.2 An application of Outline Planning Permission (ref. TA/2023/878) was submitted to Tandridge District Council on behalf of the Applicant on 11<sup>th</sup> July 2023, with the proposals associated with the implementation of an emerging site allocation for the Site, specifically Draft Site Allocation 'HSG06: Land off Salmons Lane West, Caterham', forming part of Tandridge District Council's emerging Local Plan. The submitted proposals included the introduction of a residential-led scheme, seeking to introduce a total of 87 new residential units, including 40% affordable dwellings. The application was submitted with all matters reserved save for access, with a suite of parameter plans submitted for approval alongside an illustrative site layout. These included parameter plans concerning land-use, urban grain and density, maximum building heights, tenure, parking and landscaping (including retention of trees).
- 1.3 The submitted application was supported by a Heritage Statement, prepared by Montagu Evans LLP, which included a detailed study of the Site's historical development, the identification of relevant heritage assets (both designated and non-designated), as well as statements of significance for the heritage assets identified and likely to be affected by the development of the Site and implementation of the emerging site allocation. It also included an assessment of the potential impacts arising on those identified heritage assets. We touch on the conclusions of the submitted Heritage Statement later in this report.
- 1.4 Since the submission of the outline planning application, Surrey County Council have provided consultee comments to Tandridge District Council concerning the submitted application, specifically concerning heritage and design considerations. A full copy of Surrey County Council's comments is included within Appendix B, though can be summarised as follows:
  - The northern area is one of the most well considered elements of the scheme.
  - Noting the northern part of the Site retained little of the original layout, and as a result had greater potential for change (providing the change fits within the overall landscaping of the Site).
  - Noted the proposed view towards the NAAFI as being a positive feature.
  - Acknowledged the loss of the non-designated heritage asset of the Former Workshops, noting that a building recording condition (level 3) would need to be secured as part of any future determination of the proposals. Identified harm on the conservation area (less than substantial) owing to the removal/ demolition of the Former Workshops.
  - Identified a heritage benefit stemming from the potential to introduce a commemorative feature, artwork and/ or sculpture to the northern part of the central avenue, noting a condition be added to any future decision notice to secure this element of the scheme.

- Noting the removal of parking bays within the north-eastern area of the Site, following pre-application advice.
- Noted the western area of the Site as being well considered and responsive to pre-application engagement.
- Raised concern with the southern part of the scheme, claiming that it does not adequately respond to the character and appearance of the area, though noting improvements based on what was presented at pre-application stages. principal concerns include:
  - a. circulation routes and the need for better connectivity through the southern part of the Site,
  - b. the loss of views of open space from Victor Beamish Avenue,
  - c. the southern view of Plot 10 from the north and
  - d. the appearance of Plots 2-9 – noting the importance that the principal elevation fronts onto the highway.

1.5 Following receipt of consultee comments, the Applicant has sought revisions to the Proposed Development to mitigate/ remove identified impacts noted by the County Council. This has included the preparation of an updated suite of Parameter Plans and an illustrative Coloured Layout Plan (included at Appendix A) for resubmission to the District Council.

1.6 In this Addendum, we present an overview of key amendments concerning the revised/ updated proposals, and provide an assessment of the effect on the identified heritage assets. We also provide a summary of the relevant updates to planning policy and guidance since the submission of the original application in July 2023 submission. First, for completeness, we summarise the heritage context concerning the Proposed Development.

## SUMMARY OF HERITAGE CONTEXT

1.7 As set out in the submitted Heritage Statement, the Site forms part of the former Royal Air Force Station at Kenley, which operated between 1917 and the 1970s. It includes the northern Airfield/ aerodrome, formed of an early-20<sup>th</sup> century flying field dating from World War I and later standing as important base during the Second World War, particularly during the Battle of Britain. The airfield is located to the north of the Site, and is situated within the London Borough of Croydon. It is surrounded by a series of ten Blast Pens, identified as Scheduled Monuments.

1.8 To the east of the airfield is the Grade II listed Officer's Mess, situated to the north-east of the Site. It is not considered that the proposals have the ability to affect the significance of the former Officer's Mess building, nor the series of ten blast pens, owing to the screened nature of the Mess building and the primary experience of the blast pens in association with the WWI and WWII flying field.

1.9 The whole of Kenley Campus, including the northern airfield, is included within the 'Kenley Aerodrome Conservation Area', designated in 2005-6 across the boundaries of Croydon and Tandridge District Council. The conservation area also includes the Site, located to the south of the airfield and in the boundary of Tandridge District Council.

1.10 Within the Site boundary lies the Grade II listed Former Dining Room and Institute at former RAF Kenley, also known as the 'NAAFI'. It also includes the derelict early-mid-20<sup>th</sup> century building of the Former Workshops, identified by Tandridge District Council as a non-designated heritage asset. No works are proposed to the listed NAAFI as part of the submitted planning application.

## UPDATES TO PLANNING POLICY AND GUIDANCE

### NATIONAL PLANNING POLICY FRAMEWORK (20 DECEMBER 2023)

1.11 Since the submission of the application, the National Planning Policy Framework (NPPF) has been republished (Dec 2023). The drafting of the policies relating to the historic built environment have remained the same, albeit the paragraph numbering has changed. For completeness, we restate the applicable paragraphs below. The approach, for heritage assessment purposes, is the same between the two documents.

1.12 Paragraph 200 of the NPPF states the requirement for an applicant to describe the significance of any heritage assets affected by a proposal, including any contribution made by their setting.

1.13 At Paragraph 196, the NPPF requires that local planning authorities should take account of, inter alia, *“the desirability of new development making a positive contribution to local character and distinctiveness”*.

1.14 Paragraph 205 states that:

*When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*

1.15 The definition of the setting of a heritage asset included in Annex 2: Glossary of the NPPF has not changed. Setting is the “surroundings in which a heritage asset is experienced” and the extent of a setting “is not fixed and may change as the asset and its surroundings evolve”. Setting is not itself a ‘heritage asset’, but elements of a setting “may make a positive or negative contribution to the significance of an asset”. Importantly, and as confirmed by recent decision making<sup>1</sup>, visibility of a proposal does not equate to a harmful impact, and it is the contribution setting makes to the importance (significance) of a heritage asset which is the appropriate consideration, including how that aspect of setting (that which contributes to significance) is affected by a proposed development.

1.16 Paragraph 212 states that local planning authorities should look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance. It states that proposals that preserve those elements of setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.

1.17 Policies on design are contained in Chapter 12 of the NPPF. Paragraph 135 states that planning policies and decisions should ensure that developments:

- a) *will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b) *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*

1.18 Paragraph 139 notes that “Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design”. Conversely, the NPPF states that significant weight should be given to:

- a) *Development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/ or*
- b) *Outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.*

1.19 The corresponding Tandridge District Core Strategy (20008) and Tandridge Local Plan Part 2 – Detailed Policies (2014) are Policies CSP18 (Character and Design), CSP19 (Density) and DP20 (Heritage Assets). Broadly, they are consistent in intent with the NPPF and remain relevant to the Proposed Development. They are described in further detail in the submitted Heritage Statement.

---

<sup>1</sup> Edith Summerskill House Decision: 20/01283/FUL (Planning Application ref.) & APP/H.5390/V/21/3277137 (Appeal / Planning Inspector’s Report ref.)

## OVERVIEW OF CHANGES TO SUBMITTED SCHEME

- 1.20 Following receipt of consultee comments from Surrey County Council, the Proposed Development has been revised to address concerns raised by Officers concerning heritage and design matters. Chiefly, this has included a reduction of overall unit numbers from 87 residential dwellings to 80 units, focussing the removal of dwellings to the southern portion of the Site.
- 1.21 Further changes to the proposals include the reduction in overall site density, and the reorientation of building frontages at Plots 3-10 (updated plot numbers), with frontages now facing west towards and addressing Victor Beamish Avenue, with gardens and parking spaces located to the rear (east). Footpaths and overall site connectivity has also been improved, particularly to the south, with 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.
- 1.22 Plots 10, 24 and 25 (as submitted plot numbers) have been removed from the proposed layouts, responding to comments concerning the open character and visual connections to the north-western entrance of the southern land parcel. Furthermore, Plots 11 and 19 (as submitted plot numbers) have also been removed, reducing overall building density to the south and enhancing land area to connectivity, pathways and open space.
- 1.23 The northern land parcel (that between the Airfield and the NAAFI) remains largely as submitted, save for the removal of Plots 32 and 33 (as submitted plot numbers) and enhancements to pedestrian routes connecting the eastern woodland walk with the development, improving overall pedestrian connectivity across the Site.



Figure 1: Updated Coloured Layout (January 2024)

## ASSESSMENT OF IMPACT AND CONCLUSIONS

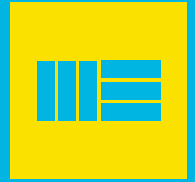
- 1.24 The following assessment considers the heritage effects arising from the updated suite of parameter plans, with specific reference to the updated illustrative Proposed Site Layout and Parameter Plans, produced by OSP Architecture.
- 1.25 As noted, the main changes proposed as part of the suite of updated parameter plans concern a reduction in building density across the Site, though the primary reduction in density is focussed to the south, within the western and southern land parcels. Importantly, the layout and form of the proposed northern parcel, one that was considered a successful element of the Proposed Development by Officers at Surrey County Council as part of the original submission, remains largely unchanged. This includes the introduction of a central thoroughfare through the centre of the Site, linking the northern elevation of the NAAFI with the Airfield to the north, whilst also reading as a military-style boulevard, with inward facing 'barrack' type terraces reinforcing the linear visual and physical connections. We continue to see this layout as a wholly positive addition to the Site and wider conservation area, reestablishing and celebrating the historical connection between the NAAFI building and the aerodrome. Currently, this connection is lost through the barren character of the Site, the existing fencing and loss of built form which once lined a central physical connection. We also see this as an enhancement to the setting of the NAAFI building, restoring a lost connection and derelict immediate setting.
- 1.26 Great care and attention has continued to be placed to the western land parcel, that to the west of Victor Beamish Avenue, seeking to retain a sense of openness together with being responsive to the historic footprint of buildings along this frontage, a key requirement from the County Council during the course of pre-application engagement. The updated proposals continue to introduce a looser grain and density on this land parcel, with built form successfully dispersed and separated by large expanses of green space. Equally, properties continue to be sited back from the street edge to retain the sense of openness upon entering the conservation area along the linear route of Victor Beamish Avenue, whilst this is enhanced through the removal of Units 10, 24 and 25 (as submitted plot numbers). The removal of Plot 10 also removes the north view of its rear and flank elevation, presenting the opportunity to create a view into the southern land parcel, again contributing to a sense of openness and permeability.
- 1.27 Within the southern land parcel, the updated proposals include a reduction in building density, which results in an overall reduction of 3 dwellings, as illustrated on the illustrative site layout. As stated in the submitted Heritage Statement, rather than taking a zonal approach to scale, tenure mix or parking distribution, the parameter plans identify individual buildings, so while the layout is a Reserved Matter, the location of buildings is essentially fixed. The illustrative site layout therefore shows how the revised unit numbers can be accommodated and orientated across the southern land parcel, and the reduction of unit numbers stands to be a betterment than the 'as submitted' scheme.
- 1.28 The revised layout includes a total of 7 new residential terraced-style buildings (Plots 3-10) fronting the eastern edge of Victor Beamish Avenue. Whilst the layout remains similar to the submitted scheme in this regard (i.e. the introduction of a coherent terraced-style form to the eastern edge of Victor Beamish Avenue), the flipping of the principal frontages and the siting of gardens and vehicles to the rear of the buildings stands to be a significant betterment, introducing a strong and cohesive relationship with Victor Beamish Avenue and an attractive gateway into the Site from the South. Equally, the break in built form at the centre of the terrace stands to break down the mass and form of the buildings.
- 1.29 The submitted Heritage Statement prepared to support the 'as submitted' proposals concluded that the introduction of 87 residential dwellings to the Site, introduced in line with the suite of parameter plans and illustrative site layout, stood to preserve important elements of the listed NAAFI building's immediate setting (including the surrounding parade ground and landscaping), whilst also introducing enhancements to its wider setting, including improved visual and physical connections with the aerodrome to the north. It was also acknowledged that owing to the change in land character and the increase in built form across the Site, there was likely to be a residual impact on the character and appearance of the Kenley Aerodrome Conservation Area, though such impacts were considered to be minimal capable of being mitigated through a comprehensive landscaping strategy, the retention and restoration of key views and the retention of function links between the former domestic areas of the conservation area and the flying field further north. It was concluded that when taken in the round, the character and appearance of the conservation area, which is intrinsically linked to its historic interest and field to the north, would be preserved.
- 1.30 The updated/ revised proposals address several concerns raised by Surrey County Council during the course of the determination process, resulting in a reduction of 7 units and sitting closer to the emerging allocated unit number of 75 homes.

The updated parameter plans, and illustrative layout improve on an already acceptable scheme in relation to planning policy and design guidance and stand to improve the quality of the Site in relation to the conservation area and setting of the listed building.

- 1.31 It is important to note here that the NAAFI and indeed the wider airfield to the north were historically seen in the context of built form across the Site, including domestic buildings to the south of the listed building, and a formal layout of functional buildings associated with flying and the use of the airfield across the northern land parcel. The land's current barren character is not in keeping with the historic context of the Site, is inaccessible and is considered to detract from the significance of the conservation area. The introduction of 80 residential units following an approach which seeks to restore physical and visual connections and introduce a new residential community which is responsive to the military character of the Site, stands to be a betterment on the existing situation. As such, we consider the Proposed Development continues to comply with Policies CSP18 and CSP19 of Tandridge District's Core Strategy (2008), whilst also fulfilling Policy DP20 of Part 2 of the Local Plan.
- 1.32 Again, if it is considered by the decision-maker that there remains residual harm to the conservation area and listed building (which continues to not be our judgement), then this must be at the lowest end of less than substantial and which has been reduce through the design development process as far as reasonably practicable. There are also weighty benefits to consider, including the delivery of housing of which 40% are to be affordable.

**Montagu Evans LLP**  
**16.01.24**

# APPENDIX A – 2024 SITE ILLUSTRATIVE LAYOUT



# APPENDIX B – SURREY COUNTY COUNCIL HERITAGE COMMENTS

