

# Biggin Hill Airport, Biggin Hill

in the London Borough of Bromley

planning application no.11/01057/FULL1

## Strategic planning application stage 1 referral (new powers)

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

## The proposal

The erection of a replacement hangar of 3,414 sq.m floorspace.

## The applicant

The applicant is **Pentbridge Properties Ltd**, and the architect is **Civils Construction Solutions**.

## Strategic issues

The land use principle to develop **Green Belt** to provide a replacement hangar is acceptable in strategic planning policy terms as the site is a designated Major Developed Site and the relevant criteria have been met.

There are outstanding issues relating to **climate change mitigation and adaptation**.

## Recommendation

That Bromley Council be advised that while the application is generally acceptable in strategic planning terms the application does not comply with the London Plan, for the reasons set out in paragraph 33 of this report; but that the possible remedies set out in paragraph 34 of this report could address these deficiencies. The application does not need to be referred back to the Mayor if Bromley Council resolve to refuse permission, but it must be referred back if Bromley Council resolve to grant permission.

## Context

1 On 27 May 2011 the Mayor of London received documents from Bromley Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 7 July 2011 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for

taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 3D of the Schedule to the Order 2008: *“(a) development on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and (b) which would involve the construction of a building with a floorspace of more than 1,000 square metres or a material change in the use of such a building.”*

3 Once Bromley Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision, as to whether to direct refusal; or allow the Council to determine it itself, unless otherwise advised. In this instance if Bromley Council resolves to refuse permission it need not refer the application back to the Mayor.

4 The Mayor of London's statement on this case will be made available on the GLA website [www.london.gov.uk](http://www.london.gov.uk).

## **Site description**

5 The application site lies within the western corner of Biggin Hill Airport which is situated approximately 10 km to the south east of Bromley town centre, bounded to the west by Main Road and Green Leaves road, and to the north by Downe road and New Road Hill. Directly to the south lies Biggin Hill village and the M25. The east of airport is bounded by West Kent Golf Club.

6 The airport covers approximately 195 hectares and is designated as a major developed site within the Green Belt in Bromley's adopted 2006 UDP. It is comprised of the terminal building/control tower area, South Camp, East Camp and the eastern part of West Camp. The site provides for a mixture of aviation uses. Biggin Hill is also recognised as a Strategic Outer London Development Centre for its transport related uses by draft replacement London Plan policy.

7 The application site itself is 0.29 hectares and is located within Area 1 of the Major Developed Site which is to the eastern part of the West Camp area of the airport, where two Type T2 hangars originally existed. The north hangar has been refurbished and has remained in active use accommodating Formula One's aircraft fleet. The southern hangar and adjoining offices were demolished in 1998 for safety reasons as they were structurally unsound. The replacement hangar will be utilising the footprint of the original hanger that had occupied the site since the early 1930's. The site is characterised by open grassland and resembles a campus atmosphere.

8 To the west of the application site is the Biggin Hill Conservation Area which contains a number of listed buildings, the closest of which lies approximately 46m from the application site. The closest residential buildings are approximately 87m from the site and are separated by Main Road and existing airport buildings.

## **Details of the proposal**

9 The application proposes the construction of a replacement Type T2 hangar of 3,414 sq.m on the footprint of the original hangar.

## Strategic planning issues and relevant policies and guidance

10 The relevant issues and corresponding policies are as follows:

- Green Belt/MOL *London Plan; PPG2*
- Outer London *London Plan*
- World city role *London Plan*
- Urban design *London Plan; PPS1*
- Climate Change *London Plan; PPS1, PPS1 supplement; PPS3; PPG13; PPS22; draft PPS Planning for a Low Carbon Future in a Changing Climate; the Mayor's Energy Strategy; Mayor's draft Climate Change Mitigation and Adaptation Strategies; Mayor's draft Water Strategy; Sustainable Design and Construction SPG*
- Transport *London Plan; the Mayor's Transport Strategy; PPG13; Land for Transport Functions SPG*

11 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2006 Bromley Unitary Development Plan and the London Plan (Consolidated with Alterations since 2004).

12 The following is also (a) relevant material consideration(s):

- The draft replacement London Plan, which underwent Examination in Public in 2010 and upon which the Panel has now reported is a relevant material consideration of significant weight.

## Green Belt

13 The entire site is designated as Green Belt in Bromley's 2006 Unitary Development Plan. National government guidance in 'Planning Policy Guidance 2: Green Belts' (PPG2), London Plan Policy 3D.9 'Green belt' and draft replacement London Plan Policy 7.16 that seek to protect London's Green Belt are therefore relevant.

14 PPG2 states that development in the Green Belt is, by definition, harmful and the construction of new buildings in the Green Belt is inappropriate unless it is for the following purposes:

- Agriculture and forestry.
- Essential facilities for outdoor sport and recreation; for cemeteries; and for other uses of land, which preserve the openness of the Green Belt.
- Limited extension, alteration or replacement of existing dwellings.
- Limited infilling in existing villages.

- Limited infilling or redevelopment of major existing developed sites identified in adopted development plans, which meet the criteria in Annex C of PPG2.

15 In addition to the above London Plan Policy 3D.9 states, *"there is a general presumption against inappropriate development in the green belt, and such development should not be approved except in exceptional circumstances."* The Mayor's strong support for the current extent of London's Green Belt is also reinforced in draft replacement London Plan Policy 7.16, which states that *"the strongest protection should be given to London's Green Belt, in accordance with PPG2. Inappropriate development should be refused, except in very special circumstances."*

16 Annex C of PPG2, which is most relevant to the proposal, refers to Major Developed Sites in the Green Belt and paragraph C2 states that *"if a major developed site is specifically identified for the purposes of this Annex in an adopted local plan or UDP, infilling or redevelopment which meets the criteria in paragraph C3 or C4 is not inappropriate development."* In such circumstances that the criteria are met, then it is not necessary to establish very special circumstances. Concerning the development proposals paragraph C3, goes on to say that *"Limited infilling at major developed sites in continuing use may help to secure jobs and prosperity without further prejudicing the Green Belt. Where this is so, local planning authorities may in their development plans identify the site, defining the boundary of the present extent of development and setting out a policy for limited infilling for the continuing use within this boundary."*

17 As defined by the adopted Bromley 2006 UDP, the application site is included within Area 1 – Passenger Terminal/Control Tower and West Camp of the Biggin Hill Major Developed Site, within which local policy BH2 deems infilling as appropriate, providing it accords with the criteria set out in PPG2 Annex C. Also, Bromley 2006 UDP policy BH4 restricts development in Area 1 to airport-related uses, of which the proposed use of the replacement hangar for the storage and maintenance of aircraft for Formula One Administration's aircraft fleet, accords to. The operational nature of the application site and restrictions to airport-related uses in Area 1 ensure that the development will have no greater impact on the purposes of including land in the Green Belt than the longstanding hangar that it is replacing, as required by PPG2 Annex C.

18 As described in paragraph 7 of this report a Type T2 hangar existed on the application site since the 1930's until it was demolished in 1998 for structural reasons. The replacement hangar will occupy a smaller built footprint than the original building, as the development omits the office buildings that originally surrounded the hangar and will be comparable in height to that of the original hangar and that of the existing hangar to the north of the site. In this regard the replacement with a hangar of very similar scale will therefore have a neutral, if not less, of an impact on the Green Belt and the developed proportion of the site, than the original hangar and therefore broadly satisfies the criteria set out in PPG2 paragraph C3 and accords with London Plan Policy 3D.9 and draft replacement London Plan Policy 7.16.

19 In addition to the proposals discussed in this report, the site has had a number of previous planning applications for more comprehensive redevelopment of the site that were submitted in 1998 (98/02895/OUTMAJ, 98/02896/OUTMAJ, 98/02897/FULMAJ, 98/02898/CON) that comprised the erection of a new hangar for civil airport/aviation uses but also included the construction of B1 office space and 250 car parking spaces. The Council deemed these proposals of larger scale and mixed uses as appropriate development and resolved to grant permission subject to the signing of a section 106 agreement. In light of this, the current proposal for the replacement of a single replacement hangar is considered acceptable.

## Outer London

20 Draft replacement London Plan policy recognises Biggin Hill as a Strategic Outer London Development Centre for its transport related uses. These areas are defined as *“business locations with specialist strengths which potentially or already function above the sub-regional level and generate growth significantly above the long term outer London trend.”* The replacement hangar will continue airport-related uses on site and contribute to Biggin Hill’s status as a Strategic Outer London Development Centre and outer London’s economic growth, in accordance with policy 2.16.

21 The hangar will be used by Formula One Administration’s aircraft fleet for storage and maintenance, as Formula One flies its TV crews in and out of Biggin Hill airport to various F1 events around the world. In addition to the above, the development will enable this function to perform more effectively and is supported by draft replacement London Plan Outer London: Economic policy 2.7. Also, the continuation and retention of Formula One’s location in London is encouraged for its contribution to the capital’s World City Status.

## Design

22 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter 4B which address both general design principles and specific design issues. London Plan Policy 4B.1 sets out a series of overarching design principles for development in London. Other design policies in this chapter and elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage, views, and the Blue Ribbon Network. The draft replacement London Plan reinforces these principles, with new development required to have regard to its context, and reinforce or enhance the character, legibility and permeability of the neighbourhood (policy 7.1).

23 The proposed development consists of a large industrial shed approximately 12m high and 37m wide. Its form is dictated solely by its function with no consideration of its appearance or visual impact. The proposed development replicates development previously on the site and its layout, access and servicing remain the same.

24 However, whilst the site is adjacent to a residential area, it is part of the grounds of the airport and has no potential in improving the permeability, legibility or character of the wider area. Due to this there are no concerns with regards to the design of the building or its layout on the site.

## Climate Change

25 The London Plan climate change policies as set out in chapter 4A collectively require developments to make the fullest contribution to the mitigation of and adaptation to climate change and to minimise carbon dioxide emissions.

26 The applicant has failed to submit an Energy Assessment as required by London Plan Policy 4A.4 and therefore it is not possible to appropriately assess the proposal’s contribution to sustainable design and construction, which is not acceptable.

27 The applicant should provide an energy assessment addressing the energy policies contained in the London Plan. The energy assessment should address the individual elements of the Mayor's energy hierarchy which requires developments to provide proposals which: 1) use less energy, 2) supply energy efficiently, and 3) use renewable energy. The assessment should follow the detailed guidance given in the 'GLA Energy Team Guidance on Planning Energy Assessments.'

## Transport

28 Given the nature of the proposals, TfL is satisfied that the application is unlikely to negatively impact on the operation of the strategic highway or public transport network.

## Local planning authority's position

29 The local planning authority position is unknown at the time of writing this report.

## Legal considerations

30 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged or direct the Council under Article 6 of the Order to refuse the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

## Financial considerations

31 There are no financial considerations at this stage.

## Conclusion

32 London Plan policies on Green Belt, Outer London, Design, Climate Change and Transport are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Green Belt:** The proposal for a replacement hangar in Green Belt is deemed appropriate development in strategic planning policy terms.
- **Outer London:** The replacement hangar will continue airport-related uses on site and contribute to Biggin Hill's status as a Strategic Outer London Development Centre and outer London's economic growth, in accordance with policy 2.16.
- **Design:** No Strategic Concern

- **Transport:** No Strategic Concern

33 On balance, whilst the application conforms generally to the London Plan, it fails to secure compliance in following regard:

- **Climate Change:** The applicant has not submitted an Energy Assessment as required by London Plan Policy 4A.4 and therefore it is not possible to appropriately assess the proposal's contribution to sustainable design and construction, which is not acceptable.

34 The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Climate Change:** The applicant should provide an energy assessment addressing the energy policies contained in the London Plan. The energy assessment should address the individual elements of the Mayor's energy hierarchy which requires developments to provide proposals which: 1) use less energy, 2) supply energy efficiently, and 3) use renewable energy.

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