

London Borough of Bromley Local Plan Examination – Matters Statement

Our ref 10500/02/MS/MS
Date 14 November 2017
From Lichfields on behalf of Biggin Hill Airport Limited

Issue 1 Have the relevant procedural and legal requirements been met, including the duty to co-operate and those required by the Conservation of Habitats Regulations 2010?

1.0 1) Is the Sustainability Appraisal that has been undertaken suitably comprehensive and satisfactory and has it sufficiently evaluated reasonable alternatives?

- 1.1 No. From the perspective of Biggin Hill Airport (“the Airport”) and the Strategic Outer London Development Centre (“SOLDC”), the Sustainability Appraisal (“SA”) for the Plan has not adequately assessed the reasonable alternatives or shown that the proposals of the plan are the most appropriate. This is related to Airport’s specific complaint that the Plan has failed to test alternatives for how far economic development objectives for the Airport could be achieved with different scales of release of Green Belt land, and this makes the Plan unsound.
- 1.2 To be clear, this criticism is not one that the Airport claims is fatal to the progress of the Local Plan. If the Airport’s criticisms are considered correct, the defects in the SA are capable of being cured through a further SA¹ which will be needed in any event should Main Modifications of the Plan be required to address any problems of ‘soundness’.
- 1.3 The purpose of raising the criticism of the SA is because this lacuna reveals a manifest failure by the Council to properly justify the policies for the Airport that it has proposed. The omission in the SA also perhaps explains why – having made the correct and welcome decision to support the principle of growth and to release some Green Belt land at the Airport (on which there is common ground) – the Council has pursued a set of proposals that are not consistent with the London Plan SOLDC policy, the evidence base, or followed through on providing the positive planning framework for the Airport that the Council’s evidence base (SD63) said would be required.

Background

- 1.4 The requirements for SA are set out in the PPG. The Environmental Assessment of Plans and Programmes Regulations 2004 (“SEA Regulations”) implement the requirements of the EU Strategic Environmental Assessment (SEA) Directive. They set out the requirements for Sustainability Appraisal (SA) of Plans with regulation 12(2) necessitating the assessment of reasonable alternatives in the context of the objectives and geographic scope of the Plan.
- 1.5 The PPG on SEA and SA sets out that the purpose of assessing reasonable alternatives within a plan-making context is to ensure that the proposals of the plan are the most appropriate (PPG

¹ Cogent Land LLP v Rochford DC [2012] EWHC 2542 (Admin)

11-001), given the potential effects of its policies on environmental, social and economic conditions and the requirements of the NPPF at paragraph 152. The PPG sets out that reasonable alternatives should be considered at an early stage (ID11-017) and that all reasonable alternatives should be compared on a like-for-like basis at the same level of detail (ID11-018). The PPG defines reasonable alternatives as:

- 1.6 *“Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable.”*
- 1.7 The PPG sets out that (ID11-018) the SA should outline why the chosen alternatives were selected and then, once the reasonable alternatives are selected and appraised, the SA should outline the reasons rejected options were not taken forward in the Plan and the reasons for selecting the preferred approach in light of the alternatives.
- 1.8 The High Court has helpfully set out the sequence for SA²:
 - 1 *“Reasonable alternatives”* have to be identified, described and evaluated because, without this, there cannot be a proper environmental evaluation of the preferred plan;
 - 2 *“Reasonable alternatives”* does not include all possible alternatives: the use of the word *“reasonable”* imports an evaluative judgment as to what should be included;
 - 3 Where the process is iterative, and new information comes forward as a result of consultation, that might transform an option that was previously judged as a reasonable alternative into one that is judged not to be so, and vice versa;
 - 4 The authority should not seek to avoid its obligation to evaluate reasonable alternatives by improperly restricting the range of options it has identified as such; and
 - 5 The authority has an obligation to give outline reasons for selecting its preferred option over the reasonable alternatives.

The Airport’s Concerns

- 1.9 Having considered the above context, our concerns are that:
 - 1 The SAs for the previous iterations of the Plan (Options and Preferred Strategy, 2013; and Draft Policies and Designations, 2014) both drew conclusions the Airport should grow, but failed to appraise how much Green Belt release should be made on land at the Airport. The scale of release is a key determinant of the effectiveness of the Plan and how far it will meet needs and deliver social and economic benefits.
 - 2 The AECOM work drew its conclusions (ones the Airport says are flawed) on how much Green Belt land should be released, but did not test alternative amounts of growth against the SA framework or seek to balance Green Belt purposes against other SA objectives.
 - 3 One of the SA Objectives³ is that *“The plan should maximise the employment and business opportunities available at Biggin Hill in light of its designation as a Strategic Outer London Development Centre.”* A quantification of opportunity is clearly material to appraisal against this important objective (to *maximise* opportunities), and yet the SA

² Paragraph 88 of R (Friends of the Earth England, Wales and Northern Ireland Ltd) v The Welsh Ministers [2015] EWHC 776 (Admin)

³ SD5: Table 4.1 of the SA

provides no assessment of realistic alternative options for achieving this, despite there clearly being representations from the Airport to support their consideration.

- 4 The SA (para 6.2.20) rejects consideration of alternatives at Biggin Hill stating that:

The Green Belt boundary amendments proposed have been subject to detailed analysis of the five Green Belt purposes. Given the support these evidence based studies provide to the Biggin Hill SOLDC Green Belt Boundary Amendment there is not considered to be any need for further reasonable alternatives appraisal at the current time.

However, this is to make an assumption about the scope of the other evidence base studies to perform an equivalent role to the SA in providing an adequate comparison of alternatives and satisfy paragraph 183 of the Framework. This assumption is not founded in the reality of those evidence-base documents, for reasons set out in the Airport's Matters Statements for Issues 4 and 11.

1,013 words

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Issue 3 **Is the Spatial Strategy for Bromley sound having regard to: the needs and demands of the Borough; the relationship with national policy and Government objectives; the provisions of the London Plan; and, the evidence base and preparatory processes? Has the Plan been positively prepared?**

1.0 **8) Is the Plan in conformity with the London Plan as required by the provisions of Section 24 of the 2004 Act?**

1.1 No. Biggin Hill Airport Ltd (“the Airport”) considers that the specific policies of the Bromley Development Plan (“the Plan”) that relate to the growth of Biggin Hill Airport are not in conformity with Policy 2.16 of the London Plan.

The London Plan policy

1.2 Policy 2.6 of the London Plan states [inter alia] that (emphasis added):

The Mayor will, and boroughs and other stakeholders should, seek to address constraints and opportunities in the economic growth of outer London so that it can rise above its long term economic trends by:

a. enabling existing sources of growth to perform more effectively, and increasing the competitive attractiveness of outer London for new sectors or those with the potential for step changes in output

b. identifying, developing and enhancing capacity to support both viable local activities and those with a wider than sub-regional offer, including strategic outer London development centres

1.3 Policy 2.16 of the London Plan states:

A The Mayor will, and boroughs and other stakeholders should, identify, develop and promote strategic development centres in outer London or adjacent parts of inner London with one or more strategic economic functions of greater than sub-regional importance (see para 2.77) by:

a co-ordinating public and private infrastructure investment

b bringing forward adequate development capacity

c placing a strong emphasis on creating a distinct and attractive business offer and public realm through design and mixed use development as well as any more specialist forms of accommodation

d improving Londoners’ access to new employment opportunities.

B The Mayor will work with boroughs and other partners to develop and implement planning frameworks and/or other appropriate spatial planning and investment tools that can effect positive change to realise the potential of strategic outer London development centres.

- 1.4 The Airport clearly welcomes the identification of the Airport as an SOLDC by Policy 103 of the Bromley Plan.
- 1.5 However, mere identification of the SOLDC in the Plan is not sufficient to demonstrate conformity. The London Plan is clear that for SOLDCs there must be approaches that involve, inter alia:
 - *“enabling existing sources of growth to perform more effectively, and increasing the competitive attractiveness of outer London for new sectors or those with the potential for step changes in output”*
 - *“Bringing forward of adequate development capacity”*
 - *“placing a strong emphasis on creating a distinct and attractive business offer... as well as any more specialist forms of accommodation”*
- 1.6 The Airport’s representations (see Matters 4 and 11) make clear its view that the Plan has failed to achieve this, notably by:
 - 1 Basing its policies on an evidence base (the two AECOM studies) that do not recognise the potential for a ‘step change’ in economic performance at the SOLDC;
 - 2 Excluding existing operational Airport land from within the SOLDC boundary;
 - 3 Not allocating sufficient development land; and
 - 4 Not releasing sufficient land from the Green Belt to enable development potential to be realised.
- 1.7 As a result, the Plan does not provide a basis for Biggin Hill to deliver its potential for a step change in economic performance, bring forward adequate development capacity or for it deliver the specialist forms of accommodation – namely large-scale hangars for occupation by Major Repair and Overhaul (MRO) companies in the aviation sector - required.

The London Plan Town Centres SPG

- 1.8 Further assistance to interpret conformity with the London Plan is provided by the Town Centres SPG. Policy 2.16 identifies that the Mayor will produce planning frameworks and tools to realise the potential of SOLDCs, and the Town Centres SPG was the basis for this.
- 1.9 Appendix E of the SPG provides “implementation guidelines” for implementing the London Plan SOLDCs. For Biggin Hill, the SPG identifies the following:
 - *Strategic function in ‘other Transport Related Functions’ as an important sub-regional hub for aviation and related high-tech industry*
 - *Develop a positive planning framework to support economic growth activities at Biggin Hill Airport and the adjoining industrial area*
 - *Enhance environmental performance of the airport in line with London Plan Policy 6.6*
 - *Review appropriate constraints through the local plan process including accessibility, Green Belt (London Plan Policy 7.16) and heritage designations whilst maintaining environmental quality*

- *Support partnership working with education and training providers related to aviation and high-tech industry*
- *Explore potential for development of aviation academy, airport heritage centre and a hotel/leisure hub of a scale appropriate to serve the airport and wider cluster*

1.10 The Airport is of the view that the Plan – whilst putting forward a number of welcome proposals – does not provide a positive planning framework to support the Airport’s economic growth activities and is not justified by a sound review of the Green Belt. The reasons for this are explained in Matter Statements 4 and 11.

1.11 Because the SPG sets out what is necessary to implement the London Plan’s SOLDC policy, the failure to provide what is necessary is further evidence of the failure to be in conformity with the London Plan.

What is required?

1.12 The Airport considers that Main Modifications as sought by the Airport would enable the lack of conformity to be addressed. These Main Modifications would involve:

- Amending the SOLDC boundary to include the full operational boundary of the Airport;
- Amending the Green Belt boundary to release East Camp, and other land (to the north and south of East Camp and the north of the Terminal Area) so that it can be developed.
- Amending the policy wording to accompany the allocations of development land to reflect the economic potential of the Airport.

2.0 9) Will the strategy satisfactorily and sustainably deliver the new development and infrastructure needed over the Plan period?

2.1 No. Whilst the Airport welcomes much of the Plan’s intention for the Biggin Hill SOLDC, it is concerned – for reasons set out in Matters Statements 4 and 11 – that the Plan’s proposals will not enable the SOLDC to fulfil its economic growth potential or meet development needs.

3.0 12) The preparatory work for the Plan has not included a comprehensive review of Green Belt to accommodate development but only changes, where necessary, to meet certain development needs. Justify this approach and its implications for the spatial strategy.

3.1 The identification of the SOLDC at Biggin Hill, the presence of exceptional circumstances associated with development needs at Biggin Hill, and the specific guidance in the London Plan Towns Centres SPG (in its Implementation Guidelines at Appendix E) provides a clear basis for a focused Green Belt review of land at Biggin Hill, separate to any requirement for a comprehensive review across the rest of the Borough. This is what the two AECOM Reports (SD70a, b and c) purport to provide. For reasons set out in our representations, the Airport has concerns that the Green Belt review exercise carried out in the two AECOM reports is flawed and this is set out in Matters Statements for Issues 4 and 11.

1082 words

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Issue 4 Are the main areas for growth properly defined, do they positively promote the spatial vision and objectives for Bromley and are the expectations for growth justified and deliverable?

1.0 Response to the Issue

1.1 The following paragraphs address the question identified in the title of this Issue dealing specifically with Biggin Hill Airport, namely:

- 1 Are the main areas for growth properly defined?
- 2 Do they positively promote the spatial vision and objectives for Bromley?
- 3 Are the expectations for growth justified and deliverable?

1.2 The responses to this Issue should be read alongside the response to Issue 11, including the associated plans and schedule of areas.

Are the main areas for growth properly defined?

1.3 Biggin Hill Airport is defined as an SOLDC, and the Airport agrees with this approach. It reflects the identification of the Airport by the London Plan, and is in principle supported by the evidence base produced by both the Airport and the Council since 2010.

1.4 Reflecting Policy 2.16 of the London Plan, Policy 7.2 of the London Plan Town Centre SPG (2014) requires Boroughs to realise the potential for further development of SOLDC, having regard for the potential outlined in Appendix E of the same document.

1.5 However, the Airport has objected to the delineation of the SOLDC by the Council. For the most part, the SOLDC boundary identified in the Plan follows the operational boundary of the Airport and encompasses contiguous industrial areas.

1.6 However, for reasons that have never been properly explained or justified by the Council, the large area of the Airport's operational land (Area 8 on the Plan in Appendix 1) to the north of East Camp has been excluded. This land has always been part of the Airport's operational boundary: it was historically used by the MoD for refuse disposal, then for fire-training, and became overgrown. The land has been cleared, is unconstrained by any safeguarding restrictions over the plan period, and has development potential.

1.7 The Airport has pointed out the error through repeated Regulation 18 consultations but the Council has neither amended the boundary nor justified its approach. The Council's response to the Consultation on the Airport representations states:

The SOLDC boundary, first published in the 2014 Draft Policies and Designations consultation document, is defined to an extent by the airport's current operational areas, privately owned business land adjoining the airport (including West Camp and the proposed LSIS), the A233 and No modification 26 Churchill Way. Taking into consideration sensitive areas to the east of the airport, the Draft Local Plan seeks to contain development in East Camp to within the existing footprint. The proposed SOLDC boundary also reflects this and expanding the boundary to include additional land in close proximity to these sensitive receptors is not supported.

- 1.8 There is no evidence produced by the Council to support the assertion that it is necessary to contain development in East Camp in order to protect sensitive areas. The Council has failed to identify: the sensitive areas in question, the nature of the sensitivity, the type of potential harm or why this might be incompatible with Green Belt release. Nor is there an explicit balancing of any purported harm with the potential benefits of development to show that the tilted balance has been engaged. Indeed, the Airport's evidence on visual impact (DLP83 Part 3) shows no significant harm would be caused.

Do they positively promote the spatial vision and objectives for Bromley?

- 1.9 The Plan's proposal go some way towards promoting the spatial vision and objectives for Bromley but unfortunately do not go far enough in ensuring the Plan can be effective in achieving its vision and objectives.
- 1.10 Insofar as it is relevant to the growth area of Biggin Hill, the Plan's Vision is expressed in broad terms (for example by reference to "*good quality ... jobs*" and "*strong and diverse businesses are able to invest to support a thriving economy*") but without a specific reference to the SOLDC. It does refer generally to Green Belt that "*fulfils its purpose, and Contributes to protecting Bromley's special character.*"
- 1.11 The Plan's objectives relevant to Biggin Hill include reference (1.3.8) to the following:
- "Bromley is a prosperous, thriving and skilled borough where businesses choose to locate. New businesses start up and grow using local skills, supply chains and investment. ... Biggin Hill SOLDC is an important sub-regional hub for aviation and related high-tech industry. There is an improved range of employment opportunities for residents and education and skills levels have been raised throughout the Borough.*
- 1.12 The objectives are also listed (1.3.9) as, inter alia:
- "Ensure there is an appropriate supply of commercial land and a range of flexible quality business premises across the Borough.*
- Ensure businesses contribute to a high quality, sustainable environment, through their premises development and locational decisions.*
- Support the appropriate provision of facilities to deliver high quality education and training.*
- Support the Strategic Outer London Development Centre (SOLDC) designation at Biggin Hill to enhance the area's employment and business opportunities, whilst having regard to the accessibility, heritage significance and environmental constraints."*
- 1.13 To achieve these objectives, it would be necessary for the proposals of the Plan to enable Biggin Hill to perform to its full potential in providing a location where specialist aviation and related high-tech businesses choose to locate.

- 1.14 In this regard, the most important types of businesses that the Airport can attract are those offering Major Repair and Overhaul (MRO) services, specifically the Original Equipment Manufacturers (OEMs), the circa 20 manufacturers of business jets¹ who seek locations for their service centres where they can offer maintenance operations for their aircraft (focused in locations where their customers fly to and from, such as London) and then co-locate with manufacturing and other operations. To use a retail analogy, these OEMs are the anchor stores that will attract other businesses. These OEMs require large-floorspace maintenance hangar space (of circa 10,000 to 15,000m²), including the ability to expand. This means available land is needed with development plots of circa 6-8ha. Attracting a number of these OEMs, alongside the provision of other facilities – such as hangars for parking for those who choose to base their aircraft at Biggin Hill – provides the basis for the Airport’s economic proposition.
- 1.15 The Airport’s concerns are that the Plan does not provide the positive planning framework necessary to meet these business needs, and that the Council has not demonstrated that there are accessibility, heritage or environmental constraints that justify why the potential should not be realised.
- 1.16 The most obvious example of this is demonstrated by the Tables at Appendix 2. These shows that the Plan’s proposed allocations enable for the location of just one strategic inward investment opportunity by a global OEM – at the land East of South Camp – and this has been earmarked by the Airport for the expansion plans currently being contemplated by Bombardier². There are no further opportunities provided for by the Plan (allocated and removed from the Green Belt). All the existing areas of Green Belt release reflect land that is already built-up and does not have the necessary space. Land at East Camp is ‘allocated’ by Draft Policy 108 but retained within the Green Belt rendering the allocation ineffective, and does not have sufficient land in any event.
- 1.17 The Airport is in advanced negotiations with a second potential OEM and to that end it submitted an EIA Screening Opinion in respect of a proposed large-scale facility of 12,600 m² on land between South Camp and East Camp; the Council has confirmed that it is not EIA development (Appendix 3) meaning in this case the Airport can and will use its permitted development rights (“PD rights”) for this new facility. But already, this proposal has exceeded the draft Plan’s proposed footprint. And for reasons set out in the URS report (SD66), there is no guarantee that PD rights will be available for future investment. Indeed, the Council’s negative screening opinion raises the prospect that cumulative effects might necessitate EIA for future developments, which would rule out future PD rights. Thus, beyond Bombardier and the second potential OEM, the current Plan does not make provision for any further large-scale OEM investment. The ability to realise the potential of other land in the Airport – for example, the smaller plots at East Camp, West Camp, and through redevelopment at South Camp – is undermined by the Airport’s weakened offer for potential OEM ‘anchor’ tenants.

Are the expectations for growth justified and deliverable?

- 1.18 The Airport has identified a longstanding expectation that it has the potential to grow the employment base of the Airport by c.2,300 or more jobs. This is built on the triumvirate

¹ Examples include Airbus, Beechcraft, Boeing Business Jets, Bombardier Aerospace, Cessna, Dassault, Embraer, Gulfstream, Honda Jet, Pilatus.

² Bombardier decided in 2016 to occupy an existing hangar in South Camp and are now contemplating expansion plans for a purpose-built facility of c. 14,000m². Refer to The Airports Issue 11 Statement para 1.11 for further details.

proposition of the Airport as a ‘London Gateway’ (attracting aircraft by virtue of its location in London³), as a ‘Home Base’ (where aircraft owners will wish to base their aircraft, attracting Aircraft Operating Companies and other private/corporate owners, alongside other services), and as a ‘MRO Service Centre’ (attracting the OEMs). Each major OEM will require the large-scale hangar space described in 1.14 above and will generate c.150-300 jobs in initial phases, plus spin off employment in supply chains who in turn will also require space on the Airport or nearby.

- 1.19 This strategy builds on recently improved operating hours (secured following a variation of the lease in 2016) and the Airport’s business focus as a small, but world class, General Aviation Airport with the ability to offer a range of existing and potential facilities along the service chain, including a large related business estate. This allows for the Airport to react to an increasing demand from operators for airports to become more vertically integrated allowing for multiple stages of the repair, maintenance and servicing processes to be accommodated in one location, rather than in various locations globally. The Airport’s growth proposition – including to operate as a major service centre for OEMs and related operations, and thus generate employment - was strongly supported by local residents (76% - no. 31,500 of responses to the Councils own consultation indicated support for the Airports proposals) during a consultation on the revised operating hours in 2015 and incorporates strict noise restrictions⁴ which are compatible with the types of aircraft movements associated with modern business and general aviation.
- 1.20 Combined this makes the Airport a highly attractive proposition for new investment. The Airport’s focus on general aviation rather than scheduled flights gives it greater flexibility for business and general aviation than competitors that have to employ slot matching to manage scheduled and general aviation flights (i.e. Luton)⁵.
- 1.21 This proposition is considered justified and deliverable, provided there is a sufficiently clear and positive planning framework. It is only through the success of the Airport, as a focus for aviation-related businesses, that brings with it development across the wider operational area, that the critical mass will be increased to warrant the transformation of West Camp as a viable office market. Alone, West Camp is simply not an attractive proposition to investors or tenants as a conventional office location⁶.
- 1.22 The Council’s evidence base (SD66 and SD70) has worked on the basis of responding to the Airport’s proposition, but has never put forward an alternative quantification of the expectation for growth. The URS report in 2015 (SD66) found the Airport’s proposals to be “ambitious” but did not state them to be unachievable. Most recently, the AECOM Addendum (SD70c) has indicated that aviation in the UK is not growing significantly, that employment in Bromley has not growth significantly, that there is uncertainty because of Brexit, and that full details of discussions between the Airport and potential OEMs occupiers have not been shared with them. This conclusion lacks justification and fails to engage with the specialist nature of the Biggin Hill

³ Both its London Gateway status and attractiveness as a Home Base are now enhanced compared to previous years by the improved operating hours agreed by the Airport and Bromley Council in 2016

⁴ Via an agreed Noise Action Plan, incorporating extensive new noise monitoring equipment:
<https://www.bigginhillairport.com/airport-information/noise-restriction/>

⁵ This is important because it prevents users of aircraft from being able to arrive and depart at times more or less of their choosing – which is a key requirement.

⁶ See para 3.12 of SD63: *Stimulating the Economy Study*

development need, and the recognition that as an SOLDC, it is specifically intended to secure a “*step change*” in economic performance⁷.

2.0 14) What is the rationale for the selection of the 3 economic growth areas of Biggin Hill, Cray Business Corridor and Bromley Town Centre, including significant housing growth in Bromley Town Centre?

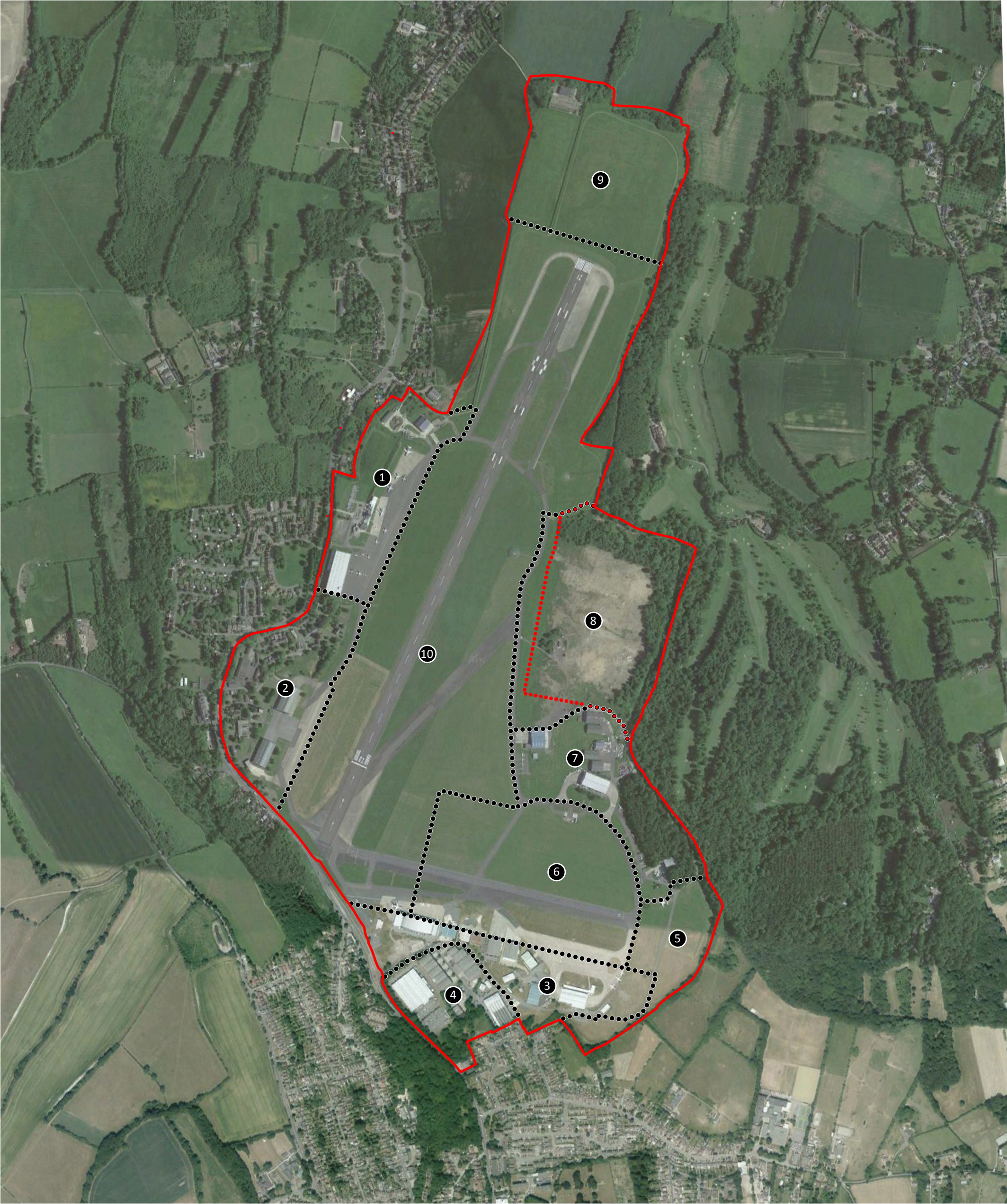
2.1 The rationale for identification of Biggin Hill as an area of growth is its designation as a potential Strategic Outer London Development Centre in the London Plan, subsequently confirmed in the London Plan Town Centres SPG.

1994 words

⁷ See para 2.77 of the London Plan

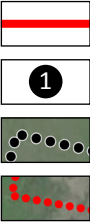


APPENDIX 1: Airport Development Parcels



Key

- Airport's proposed SOLDC boundary
- Land parcels reference
- Land parcel boundaries
- Council's proposed SOLDC boundary



Land Parcel	Area (ha)
1	11.85
2	13.58
3	11.09
4	7.30
5	7.12
6	22.83
7	13.14
8	23.36
9	18.64
10	81.60

0200m400m600m

ProjectLondon Biggin Hill

TitleLand Parcel Location Plan

ClientLondon Biggin Hill Airport

Date16.11.2017

Scale1:10000 @ A3

Drawn byLH

Drg. NoPS10500-102 Rev C

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APPENDIX 2 Schedule of Areas

TABLE 1 – Potential for large scale hangar development for OEM Investment

Airport location (See Plan in Appendix 1)	Area (Ha)	Current Use	Large-scale hangar buildings			Proposed Airport Policy for development	Council Proposed Green Belt Policy	Airport's Proposed Policy Position
			Existing	Current / Pipeline	Capacity for Future Opportunities			
1. Terminal Area	11.85	Existing developed area. Terminal Building and two large Aircraft Hangars, taxiway and car parking for visitors and staff.	2	0	0	Policy 104	Release from Green Belt	Release from Green Belt Subject to single SOLDC-wide development policy
2. West Camp	13.58	Existing developed area. Two medium-size aircraft Hangars, a number of small-scale historic buildings and taxiway.	0	0	0	Policy 105	Release from Green Belt	Release from Green Belt Subject to single SOLDC-wide development policy
3. South Camp	11.09	Existing developed area. A range of small and medium hangars, with one large scale Hangar to the western edge along with taxiway.	1	0	0	Policy 106	Remain out of Green Belt (as per existing UDP)	Subject to single SOLDC-wide development policy

Airport location (See Plan in Appendix 1)	Area (Ha)	Current Use	Large-scale hangar buildings			Proposed Airport Policy for development	Council Proposed Green Belt Policy	Airport's Proposed Policy Position
			Existing	Current / Pipeline	Capacity for Future Opportunities			
4. Business Park	7.3	Existing developed area. Small and Medium sized warehouses and industrial units	0	0	0	No Specific Policy General SOLDC Policy 103	Remain out of Green Belt	Subject to single SOLDC-wide development policy
5. Land East of South Camp	7.12	Open space, comprising grass verge and a road for vehicle access.	0	1	0	Policy 107	Release from Green Belt	Release from Green Belt Subject to single SOLDC-wide development policy
6. Land between South Camp and East Camp	22.83	Largely open space comprising grass verge, taxiway and part of the east west runway	0	1	1	No Specific Policy General SOLDC Policy 103	Remain in Green Belt	Release from Green Belt Subject to single SOLDC-wide development policy
7. East Camp	13.14	A number of small and medium sized hangars, taxiway and small woodland	0	0	0	Policy 108	Remain in Green Belt	Release from Green Belt Subject to single SOLDC-wide development policy
8. Land North of East Camp	23.26	Largely open land.	0	0	2	No Specific Policy Outside of SOLDC Boundary	Remain in Green Belt	Release from Green Belt Subject to single SOLDC-wide development policy

Airport location (See Plan in Appendix 1)	Area (Ha)	Current Use	Large-scale hangar buildings			Proposed Airport Policy for development	Council Proposed Green Belt Policy	Airport's Proposed Policy Position
			Existing	Current / Pipeline	Capacity for Future Opportunities			
9. Land to the north of the Airfield	18.64	Open land	0	0	0	No Specific Policy General SOLDC Policy 103	Remain in Green Belt	Remain in Green Belt Subject to single SOLDC-wide development policy
10. Runway and adjoining land	81.60	North-south runway, taxiway and grass verge.	0	0	0	No Specific Policy General SOLDC Policy 103	Remain in Green Belt	Remain in Green Belt Subject to single SOLDC-wide development policy
Total	210.41		3	2	3			

Of which, one is in an area the Council propose to retain in Green Belt

Of which, all three are in areas the Council propose to retain in Green Belt

TABLE 2 – Schedule of Green Belt Retention and Release

Proposed Status	Land Parcels (as per Plan in Appendix 1)	Scale (Ha)
Existing non-Green Belt land	3, 4	18.4
Common ground on land to be retained in Green Belt	9, 10	100.2
Common ground on land to be released from Green Belt	Part 1, 2, 5	29.9
Airport's suggested further Green Belt release	Part 1, 6, 7, 8	61.9
Open land available for development	5, 6, 8	53.2*
Of which, proposed for release from the Green Belt by the Council	5	7.1

*Gross Area - Not all land would be occupied by hangars and other buildings due to taxi way and apron and other offsetting requirements.



APPENDIX 3: EIA Screening Opinion and Plan



Town Planning

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BY EMAIL ONLY

15th September 2017

Dear Mr Jaulim,

Re: Reference: 17/03894/EIA. Biggin Hill Airport, Churchill Way, Biggin Hill, TN16 3BN

Screening Opinion pursuant to Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2017 in respect of erection of an aircraft maintenance hangar.

I refer to your request for a formal screening opinion dated 18th August 2017 and received on 21st August 2017 as to whether the above proposal is "EIA development" within the meaning of the Regulations.

The 2017 Regulations identify two types of development projects: Schedule 1 developments, for which an EIA is mandatory, and Schedule 2 developments, for which EIA may be required. The proposed development is not Schedule 1 development but is considered to be Schedule 2 development (under paragraph 10eii), being an airfield construction with the area of development exceeding 1 hectare. Determination of whether an EIA is required is considered in relation to Schedule 3 of the Regulations, by virtue of factors such as its characteristics, location and the characteristics of the potential impact.

The PPG gives further advice on screening development proposals. The guidance states:

...Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination.

The provisions of the adopted development plan will clearly be material to the eventual determination of the planning application for the proposed development. However, they are not directly relevant to the decision on whether Environmental Impact Assessment should be required.

The development proposed involves a scheme on a site of 2.65 hectares (gross site area) and 1.47 hectares gross additional internal floor space, and therefore falls within the description of development under paragraph 10(a) of Schedule 2 to the Regulations and exceeds the threshold in column 2 of the table in Schedule 2 of the 2017 Regulations. However the site is not within a sensitive area as defined by the Regulations.

The site is a business aviation airport which covers approximately 195Ha of land. The operating hours of the airport, and restrictions as to the timings of flights are controlled. The general character of the site is that of an aviation use with hangars, runways and ancillary buildings disbursed throughout.



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The proposed building is sited between the South and East camps of the site. An access route and airport taxi system are proposed as part of the application to connect the hangar to the wider site. The proposed hangar has a max height of 19.6m and measures a max of 150 x 48m footprint. To the west of the hangar is ancillary office space. To the north and east of the hangar are workshop and stores space which wrap around the hangar. 115 car parking spaces are shown to the north and east of the hangar. The buildings are proposed as an off white / grey building with blue trim to match other buildings on site.

The building is proposed to accommodate 12 aircraft at any one time. The size and height of it has been dictated by aircraft size. Aircraft operations within the building would not take place outside of the airport operating hours.

The proposed development would result in an increase in built form across the site. However, the site is identified in the UDP as appropriate for such use and for such development. The proposed hangar is of a significant bulk and scale, however there would be limited views of it from outside of the airport site and it would be viewed within the backdrop of the existing airport development and within the context of a developed site.

It is an important point that the hangar would not facilitate the operation of any additional uses, but would accommodate existing uses on site, which are commensurate with its permitted use. In addition, its use would be tied to the operating hours of the site by the existing Noise Action Plan.

Although the cumulative effect of development on the site is reaching a point where an environmental statement could be necessary to assess its visual impact, it is not considered on balance that this stage has yet been reached.

For the reasons set out in this letter, taking into account the selection criteria in Schedule 3 of the Regulations and the terms of the European Directive, the development would not be likely to have significant effects on the environment generating a need for an EIA by virtue of factors such as its nature, size, location or the characteristics of the potential impact.

Accordingly, in exercise of the powers conferred on the Local Planning Authority by Regulation 5 of the Regulations and the powers delegated to me by the Council, I hereby confirm that the proposed development described is not "EIA development" within the meaning of the 2017 Regulations.

A copy of this Screening Opinion has been placed on the Planning Register.

Yours sincerely,

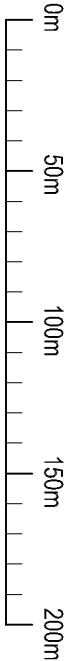
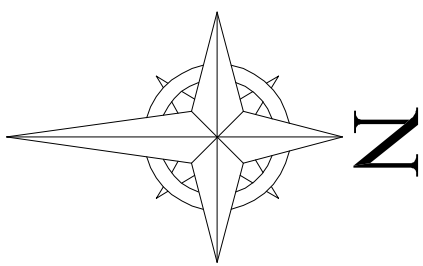
Tim Horsman

Tim Horsman
Planning Development Control Manager

DO NOT SCALE.

Note

Use figured dimensions only.
All dimensions are to be checked on site prior to construction or fabrication and any discrepancies reported to the author.
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All building materials, components and workmanship to comply with current construction legislation, Building Regulations, Codes of Practice and where applicable, standards of construction.
This drawing is to be read in conjunction with all related drawing issues.



Revisions

Rev	Description	Drn	Date
-	First Issue	RJB	xx.06.17
A	Updated to suit revised building plan	RJB	06.07.17
B	Updated to suit UK Concept plan	RJB	18.07.17
C	Updated	RJB	26.07.17

Project
Biggin Hill Airport

Future Hangar Development

Drawing Title

Location Plan



Construction & Property Solutions

3 Acres Park, Brookbridge Road, East Peckham, Kent TN12 5HP
Tel - 01622 879203 Fax - 01622 879201

Scale
1:2500 @ A1

Date
June 2017

Drawing No

TEQ1824-102

Rev

C

London Borough of Bromley Local Plan Examination – Matters Statement

Our ref 10500/02/MS/OW
Date 14 November 2017
From Lichfields on behalf of Biggin Hill Airport Limited

Issue 11 Are the policies for employment in Bromley justified, consistent with national policy and will they be effective?

1.0 50) Does the plan provide for the positive planning of employment growth and an adequate analysis of employment floorspace needs in the Borough?

1.1 No. From the perspective of London Biggin Hill Airport (“The Airport”), the plan has failed to plan positively to facilitate and optimise the growth potential of the SOLDC location. The way in which the plan has failed in these respects can be summarised under three core topics, as follows:

1. Strategic Outer London Development Centre (SOLDC)

1.2 The SOLDC boundary prepared by the Council fails to include all land within the operational area of the Airport as defined by that Civil Aviation Authority (CAA) and as agreed with the Council for the purpose of applying the Airport’s Permitted Development Rights.

1.3 There has been no evidential justification provided by the Council to support its omission, as is outlined in para 1.5 and 1.6 of the Airport’s Matters Statement to Issue 4. The variation in SOLDC boundaries is demonstrated on the plan at Appendix 1.

2. Green Belt Release

1.4 The Airport agrees with the Council that exceptional circumstances exist (as outlined in Appendix 10 page 360 of the Proposed Submission Draft Local Plan) for the release of Green Belt land in accordance with para. 83 of the NPPF. The exceptional circumstances are:

- A pressing need for development and realising the potential of the SOLDC;
- the inability to confidently meet this need under existing Green Belt policy;
- the absence of alternative non-Green Belt locations in Bromley or London’s other airports; and
- The significant economic benefits to Bromley and the wider economy of development.

1.5 Regrettably, however, the Council has not gone far enough in its Green Belt release to ensure it plans positively for employment growth. In section 10.10 (Appendix 10) of the Draft Local Plan the Council acknowledges that it supports the strategic economic growth of the Airport and that this growth cannot be achieved without amendments to the Green Belt. However, the proposed

release will not meet the policy expectations of the London Plan¹ nor the Council's own aligned aspiration for the SOLDC².

- 1.6 To assist in demonstrating how the failure to release more Green Belt (acknowledged by the Council to be an impediment to growth) is a barrier to the Airport's ability to realise its potential, a schedule of the various parcels of land has been included at Appendix 2.
- 1.7 This demonstrates that while the Plan does remove circa 30 ha of land from the Green Belt, the majority of this (77% / 23 ha) is on land (at West Camp and the Terminal Area – Areas 2 and 1 on Plan at Appendix 2) that is already built-up and has little or no plots that are available now for development, and none of any significant size. The only area of available, currently undeveloped land released from the Green Belt is the 7ha on land East of South Camp (Area 5 on Plan at Appendix 1).
- 1.8 The Council's evidence base had under-estimated the growth potential of the Airport, principally because, in the Airport's view, it has fundamentally misunderstood its nature and origin.
- 1.9 The Airport's clear position has been that the driver of economic growth at the Airport – certainly in the first two phases of the plan period - is a requirement for air-side hangar-based accommodation for those offering Major Repair and Overhaul (MRO) services. The demand for this accommodation flows in part from the Airport's existing businesses (many of whom will need to decant from existing premises to new hangars) but the catalyst for a step change is the attraction of exogenous, large-scale Original Equipment Manufacturer (OEM) businesses³. These global businesses are the very kind noted in 10.10 of the Draft Local Plan that are often deterred by uncertainty and can readily locate elsewhere outside of the UK.
- 1.10 Their requirements are for large-scale hangers (in the region of 10,000 – 15,000m²), with the potential to extend their operations in future. This means the Airport is working on the assumption that to attract an OEM, it needs to be able to provide it with a potential development area of circa 14-16ha to accommodate a phase 1 and phase 2 expansion area.
- 1.11 The Airport has two current OEM projects in the pipeline:
 - Bombardier, who relocated to Biggin Hill in 2016 to occupy the former 'Rizon' hangar (at the western end of South Camp) are now contemplating a potential expansion of their operation into a new 'L-shaped' hangar of 14,000 m² in South Camp and the new proposed allocation on land East of South Camp. This potential development would fully utilise all of the air-side⁴ land that the Council is proposing to release through the new Plan.
 - A new hangar of 12,600m² on land between East Camp and South Camp (Area 6) for a global OEM (its identity is confidential) which was subject to an EIA screening submission in August 2017 (see Appendix 3) and is to be the subject of a Permitted Development rights submission shortly. This proposal would be the first phase of a larger operation which would then in combination occupy the whole of Area 6.

¹ Policy 2.16 of the London Plan sets out the requirement to “realise the potential” of SOLDCs. The Local Plan's conformity with the London Plan is reviewed in the Airport's Matter Statement for Issue 3

² The Plan's aims for Biggin Hill are to “realise its potential and create a positive planning framework to support economic growth”

³ We described these OEM businesses at para 1.12 of the Airport's Matters Statement for Issue 4.

⁴ Air-side refers to the movement area of an airport, adjacent terrain and buildings or portions thereof, to which access is controlled. (International Civil Aviation Authority Annex 17 Security Doc 8973/8)

Neither of these projects could be delivered through any of the other built-up sites allocated/released from the Green Belt. The Map and Schedule at Appendix 4 illustrates these hangars and where others could be located relative to the proposed Green Belt Release.

- 1.12 It is thus clear the Council's proposals for Green Belt release are already taken-up by the need to accommodate the expansion of Bombardier's operations (see para 1.11 above) . This is with some 15 years remaining of the Plan period.
- 1.13 There is only one other area with the scale to accommodating a large scale OEM facility: area 8 north of East Camp has space for two further large hangars. Neither this nor the area subject to the EIA screening submission is proposed to be released from the Green Belt.
- 1.14 The Council proposes to release two other areas from the Green Belt:
- Area 1: The Terminal Area, which is already at capacity⁵;
 - Area 2: West Camp, which is an existing built-up area, under different ownership, predominantly covered by a Conservation Area and contains 10 Listed Buildings. These factors limit the potential for large-scale hangarage, and demand for the (predominantly office) space this site would yield will only be realised towards the end of the plan-period off the back of realising the potential of aviation businesses on the rest of the Airport.
- 1.15 The combined effect is Green Belt release which does little to facilitate growth. The land proposed for release is not sufficient to attract and offer certainty to large scale global operators who will drive the potential of a SOLDC linked to the global aviation industry. The demand clearly exists – notably off the back of the recent change in operating hours - but the current and projected constraints will not allow Biggin Hill to fulfil its potential.
- 1.16 Further analysis of the appropriateness of Green Belt Release is provided in response to Question 59 below.

3. Policy

- 1.17 The proposed policy for the Airport, and in particular the individual camps, is not positively framed. Whilst the intent of Draft Policy 103 is welcomed, setting out a framework for positive growth at the SOLDC, the resulting Camp-based policy does not reflect the aims of Appendix E of the Town Centre SPG, as required of the SOLDC, nor is it conducive to allowing a flexible approach to development.
- 1.18 A single Airport-wide policy would suffice and one which does not use an 'aviation-related' definition, which may unwittingly prevent occupiers at the Airport who would benefit from being at the Airport and support the SOLDC designation. A more flexible approach, supported by the NPPF paras 14 and 21 and the Town Centre SPG, as proposed within DLP83 (Part 1) para 5.29 and outlined in Appendix 5 is considered more appropriate.
- 1.19 There is a clear inconsistency between Policy 108 which promotes development at East Camp⁶, and the Plan's proposal to retain East Camp in the Green Belt.

⁵ The construction of a new hanger is about to be completed

⁶ In a manner not dissimilar to at other 'Camps' not in the Green Belt

2.0 58) How does policy 103 balance the assessed needs for development including aviation and high-tech industry, in accordance with the London Plan, with Green Belt, heritage assets, other designations and the amenity of local residents? Does the site boundary include all of the necessary areas to successfully implement the proposal?

2.1 A 'balance' requires the correct weighting of factors on either side of the equation. The Airport's concern is that the Council does not have this in place, by virtue of inadequate evidence on both need and Green Belt. The Airport's position is that its growth plans (as reflected in its representations) do reflect the appropriate balance, in conformity with the London Plan, and consistent with the NPPF.

2.2 Draft Policy 103 supports the principle of growth at London Biggin Hill Airport in the context of the SOLDC. The policy wording is positive and promotes support and flexibility in achieving the aims of London Plan Policy 2.16 and the Town Centre SPG. However, the supporting Policy (104 to 108) and associated maps (including the amendments to the Policies Map) do not reflect the positive nature of Draft Policy 103.

Development Need

2.3 The Airport's strategy, as evidenced in their representations DLP83, demonstrates potential for 2,600 new jobs at the Airport over the plan period. The Council's evidence (SD60 and SD77) has never offered alternative growth projections – stating only that the Airport's projections were 'ambitious'. More recently, the Council's evidence has referenced Brexit and the slower employment growth figures in the Borough of Bromley, implying they do not support the growth projections of the specialist high tech Global industries proposed at London Biggin Hill SOLDC.

2.4 The Council has failed to take into account the constrained nature of the Airport and the particular circumstances that will enable growth. For example:

- 1 Due to safeguarding, sight lines and communication lines there are areas of the Airport that can never be built on⁷;
- 2 There is a need for the Airport to use land parcels to decant existing users in the short term to enable replacement of out-dated premises in order to make more efficient use of existing built areas;
- 3 The reactive nature of the industry means if the Airport is to compete for large-scale global OEM and other types of operator, it must have readily available (often larger plots of) land, that has a positive planning framework to encourage investment; and
- 4 Linked to the above, the Airport will have to invest significant resources in upgrading and improving infrastructure to facilitate the growth plan for which it will need planning policy certainty.

2.5 As a result of the Council failing to appreciate the requirements of the Airport or supporting the evidenced growth projections, the need assessment is flawed. This is exacerbated by the failure of the Council to apply a correct SOLDC boundary.

⁷ For example, Area10 on land either side of the runway cannot be developed due to safeguarding.

‘Constraint’

- 2.6 It is common ground that the proposals of both the Airport and Council are not fettered by the heritage or other environmental constraints.
- 2.7 The projected growth would not result in increased air traffic movements beyond the level agreed with the Council under the terms of the Airports lease, which also sets out improved noise controls to reduce noise impacts from the Airport⁸.
- 2.8 The significant factor is the failure of the Council to adequately release Green Belt. The Airport’s Green Belt review (DLP83 Part 3) demonstrates that further release of land from the Green Belt could be made at London Biggin Hill without harming land which serves the purpose of Green Belt (this is discussed further in answer to Question 59 below).

3.0 59) For each of the three areas proposed to be removed from the Green Belt, set out the exceptional circumstances for the loss of Green Belt in each area.

- 3.1 Exceptional circumstances exist that justify amendments to the Green Belt release at London Biggin Hill Airport⁹. This is underpinned by London Plan Policy 2.16 and Town Centre SPG Section 7 and Appendix E which identify a requirement for Boroughs to support the growth of identified SOLDCs. The GLA’s Town Centre SPG specifically identifies the need to review constraints to development including Green Belt.
- 3.2 If it can be demonstrated that the removal of land from the Green Belt would facilitate development without harming the overall purpose of the Green Belt (para 80 of the NPPF) whilst having regard to paragraph 85 of the NPPF, then it would clearly be acceptable for Green Belt designation to be removed.
- 3.3 The Plan at Appendix 2 shows the areas (nos. 1 [southern and central], 2, and 5) where it is common ground between the Council and Airport that land should be removed the Green Belt. The map also shows the three extra areas which the Airport considers should be released from the Green Belt.
- 3.4 The Airport agrees parcels 1, 2 and 5 do not fulfil the requirements of Paragraph 80 of the NPPF to an extent that warrants their retention in Green Belt when balanced against development needs and the policy foundations for meeting that need¹⁰. We agree that exceptional circumstances exist and that in these instances the modification to Green Belt boundaries are appropriate.
- 3.5 However, The Airport believes that the Council have not gone far enough in respect of Green Belt release and the policy obligations of the London Plan and NPPF mean further release of the Green Belt at The Airport is justified.
- 3.6 The areas with which the Council and the Airport do not agree are (as referenced on the plan in Appendix 2) as follows:
- The northern area of Parcel 1
 - Parcel 6

⁸ http://www.bromley.gov.uk/downloads/file/2126/biggin_hill_airport_proposals

⁹ See para 1.6 of this Matters Statement

¹⁰ This is confirmed by the AECOM Green Belt Review (SD70 a, b, and c) and the Tyler Grange Green Belt Review (DLP83 Part 3).

- Parcel 7
- Parcel 8

- 3.7 These areas represent land which is within the operational area of the Airport and that is developable within the plan period. Land which is heavily constrained by safeguarding, site and communication lines (parcels 9 and 10 on the Plan in Appendix 2) is not sought for release and indeed will, alongside existing landscape features, provide a strong and defensible boundary for a revised Green Belt boundary, thereby providing assurance that the extent of release sought by the Airport will be the full extent possible, including beyond the plan period.
- 3.8 It is common ground that Parcel 6 (land between East Camp and South Camp) does not serve the purpose of Green Belt¹¹. AECOM's Addendum report does not propose to release this area from the Green Belt due to it believing there is insufficient evidence to support the growth projections to justify further release, despite para 85 of the NPPF which states Green Belt should *"not include land which it is unnecessary to keep permanently open"*.
- 3.9 This conclusion was drawn without AECOM or the Council providing any alternative growth estimates. The area is now subject to an EIA Screening for a Hangar of 12,600sqm to meet the need of an identified OEM, which also has a future requirement for a second, equivalently size hangar for future expansion.
- 3.10 Areas 7 and 8 have, in AECOM's review, been afforded increased status, but this is not justified by the evidence. The Tyler Grange Green Belt review (DLP83 Part 3) shows clear flaws in AECOM's methodology which erroneously results in increased degrees of importance being placed on these land parcels. The land in question is:
- Contained within the operational extent of the Airport;
 - Separated from adjacent countryside and neighbouring settlements by woodland; and
 - Separated from the RAF Biggin Hill Conservation Area.
- 3.11 Both land parcels would have some minor visibility from adjacent footpaths, but based on the scale of hangars that might be proposed¹² this would not be significant to warrant its protection or cause it to be detrimental to the preservation of surrounding retained Green Belt.
- 3.12 AECOM considered the land to the north of Parcel 1 to require retention in the Green Belt to check unrestricted sprawl. However, as evidenced by Tyler Grange, the area is already developed, lies within the built edge of the Airport, is bound by perimeter fencing, trees, a public house and agricultural buildings, which provide separation both from the open countryside and the nearest road extending from the edge of an urban area. Its release from Green Belt would not threaten unrestricted sprawl of an urban area.
- 3.13 Finally, as outlined in representations DLP83 (Parts 1 and 2), the failure to release adequate land from the Green Belt also fails to take account of the need for the Airport to decant operations around the site to rationalise and improve efficiency. The initial AECOM report acknowledged its failure to address decanting issues. The AECOM Addendum claims to reflect it, but does not say how or provide any evidence to support this assertion. Overall, the AECOM work fails to have proper regard for the growth strategy for the Airport, its potential to contribute to the economy, and fulfil its potential for a step-change as a SOLDC.

¹¹ See the AECOM addendum report (SD70c) and Tyler Grange report.

¹² The sites were tested by Tyler Grange with large-scale hangars to represent worse case.

3.14 As such, the growth potential identified by the Airport to support the SOLDC cannot be met by the proposed Green Belt release or the SOLDC boundary. The Council's proposals are unsound. The release proposed by the Airport is necessary to meet need, does not causes unacceptable harm to Green Belt purposes, and is justified by exceptional circumstances.

4.0 **60) What provision will be made for the involvement of local communities, including those outside the Borough, as well as other stakeholders, in the development of proposals for the Development Centre?**

4.1 This question is best to be considered by the Council in terms of its approach to ongoing consultation and engagement.

4.2 However, the Airport has engaged with the local community and stakeholders through two core channels which it expects would continue and could provide routes for ongoing involvement:

- The LoCATE@Biggin Hill Initiative; and
- The Independent Airport Consultative Committee.

5.0 **61) The expansion in job growth relies predominantly on the expansion of existing businesses on the site. How is this justified in the evidence base?**

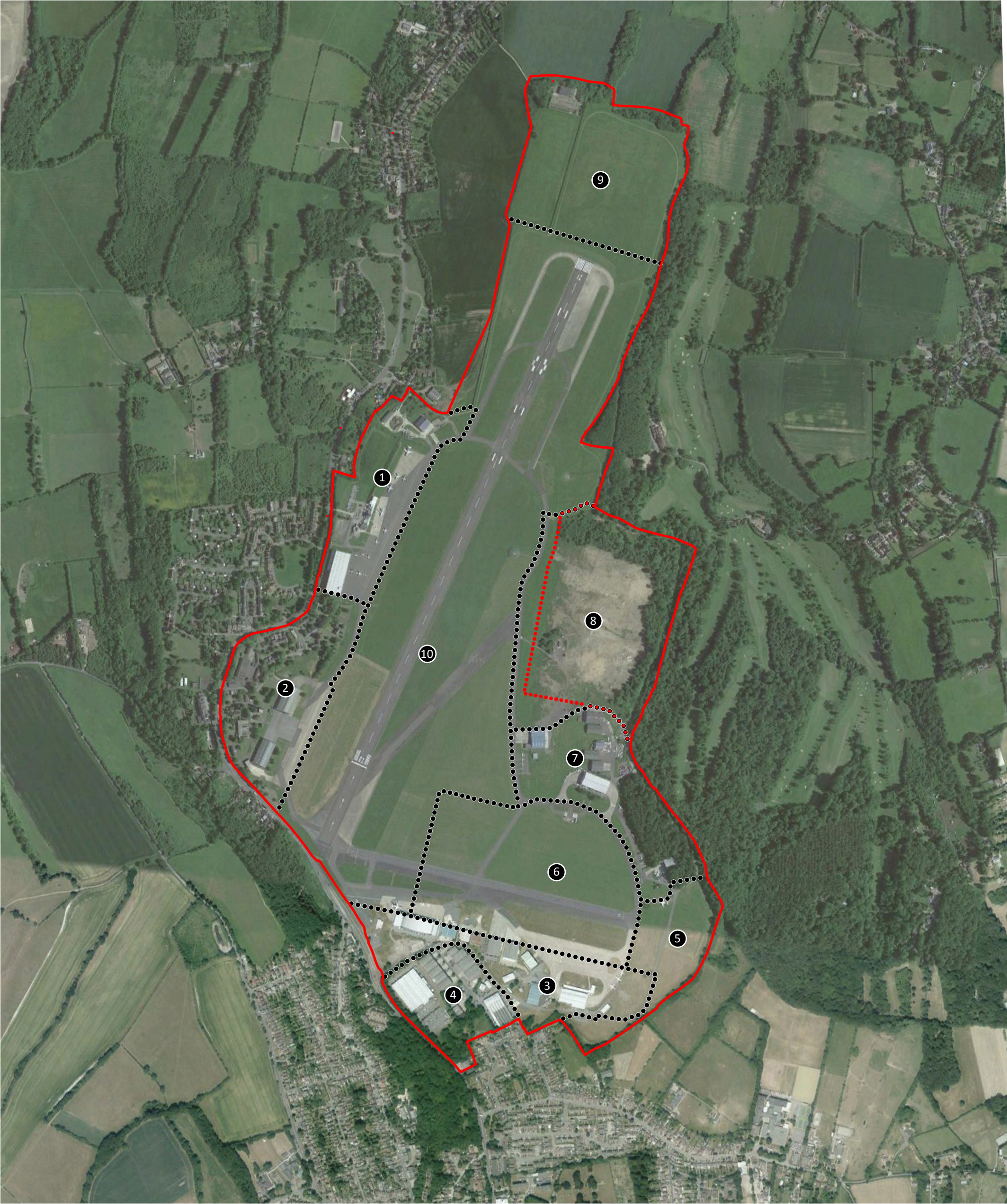
5.1 Growth of the Airport does not rely predominantly on the expansion of existing businesses. Some growth will clearly emerge from expansion of indigenous businesses - recent enquiries from small and medium size operators already on the Airport revealed a combined demand for additional hangar space to accommodate future expansion plans totalling c. 25,000sqm¹³, However, the Airport expects the step change in growth to be driven from a range of sources, not least of which will be significant exogenous investment by OEMs and Aircraft Operating Companies¹⁴ (AOCs) offering manufacturing and servicing (see the Airport's Issue 4 Statement) which will in turn encourage expansion from existing businesses and other new investment. It is these exogenous investments that are most likely to deliver a step-change in growth and drive the requirement for the largest hangars; it is therefore these business needs which necessitate a positive planning policy environment.

2,992 words

¹³ This excludes demand from existing and future OEMs for hangar space shown in the plan to Appendix 4. It is made up of a number of different sized hangar developments.

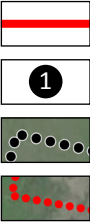
¹⁴ Aircraft Operating Companies (AOC's) own and manage business jets and provide maintenance repair and overhaul services (MRO) alongside dedicated MRO companies ensuring that all associated services are delivered for aircrafts to meet all necessary regulatory standards and customer expectation.

APPENDIX 1 – Airport Development Parcels



Key

- Airport’s proposed SOLDC boundary
- Land parcels reference
- Land parcel boundaries
- Council’s proposed SOLDC boundary



Land Parcel	Area (ha)
1	11.85
2	13.58
3	11.09
4	7.30
5	7.12
6	22.83
7	13.14
8	23.36
9	18.64
10	81.60

0200m400m600m

ProjectLondon Biggin Hill

TitleLand Parcel Location Plan

ClientLondon Biggin Hill Airport

Date16.11.2017

Scale1:10000 @ A3

Drawn byLH

Drg. NoPS10500-102 Rev C

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APPENDIX 2 – Green Belt Release Comparison



Key

Airport’s proposed SOLDC boundary

Land parcels reference

Land parcel boundaries

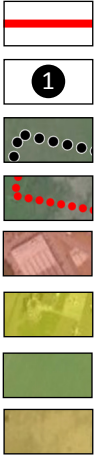
Council’s proposed SOLDC boundary

Existing non-Green Belt land

Common ground on Green Belt release

Common ground on retained Green Belt land

Airport’s suggested further Green Belt release



Land Parcel	Area (ha)
1	11.85
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4	7.30
5	7.12
6	22.83
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0200m400m600m

ProjectLondon Biggin Hill

TitleComparison of Green Belt Release

ClientLondon Biggin Hill Airport

Date16.11.2017

Scale1:10000 @ A3

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LICHFIELDS



APPENDIX 3 – EIA Screening Opinion and Plan



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Mr J Jaulim
Litchfields
14 Regent's Wharf
All Saints Street
London
N1 9RL

owain.nedin@lichfields.uk

BY EMAIL ONLY

15th September 2017

Dear Mr Jaulim,

Re: Reference: 17/03894/EIA. Biggin Hill Airport, Churchill Way, Biggin Hill, TN16 3BN

Screening Opinion pursuant to Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2017 in respect of erection of an aircraft maintenance hangar.

I refer to your request for a formal screening opinion dated 18th August 2017 and received on 21st August 2017 as to whether the above proposal is "EIA development" within the meaning of the Regulations.

The 2017 Regulations identify two types of development projects: Schedule 1 developments, for which an EIA is mandatory, and Schedule 2 developments, for which EIA may be required. The proposed development is not Schedule 1 development but is considered to be Schedule 2 development (under paragraph 10eii), being an airfield construction with the area of development exceeding 1 hectare. Determination of whether an EIA is required is considered in relation to Schedule 3 of the Regulations, by virtue of factors such as its characteristics, location and the characteristics of the potential impact.

The PPG gives further advice on screening development proposals. The guidance states:

...Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination.

The provisions of the adopted development plan will clearly be material to the eventual determination of the planning application for the proposed development. However, they are not directly relevant to the decision on whether Environmental Impact Assessment should be required.

The development proposed involves a scheme on a site of 2.65 hectares (gross site area) and 1.47 hectares gross additional internal floor space, and therefore falls within the description of development under paragraph 10(a) of Schedule 2 to the Regulations and exceeds the threshold in column 2 of the table in Schedule 2 of the 2017 Regulations. However the site is not within a sensitive area as defined by the Regulations.

The site is a business aviation airport which covers approximately 195Ha of land. The operating hours of the airport, and restrictions as to the timings of flights are controlled. The general character of the site is that of an aviation use with hangars, runways and ancillary buildings disbursed throughout.



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The proposed building is sited between the South and East camps of the site. An access route and airport taxi system are proposed as part of the application to connect the hangar to the wider site. The proposed hangar has a max height of 19.6m and measures a max of 150 x 48m footprint. To the west of the hangar is ancillary office space. To the north and east of the hangar are workshop and stores space which wrap around the hangar. 115 car parking spaces are shown to the north and east of the hangar. The buildings are proposed as an off white / grey building with blue trim to match other buildings on site.

The building is proposed to accommodate 12 aircraft at any one time. The size and height of it has been dictated by aircraft size. Aircraft operations within the building would not take place outside of the airport operating hours.

The proposed development would result in an increase in built form across the site. However, the site is identified in the UDP as appropriate for such use and for such development. The proposed hangar is of a significant bulk and scale, however there would be limited views of it from outside of the airport site and it would be viewed within the backdrop of the existing airport development and within the context of a developed site.

It is an important point that the hangar would not facilitate the operation of any additional uses, but would accommodate existing uses on site, which are commensurate with its permitted use. In addition, its use would be tied to the operating hours of the site by the existing Noise Action Plan.

Although the cumulative effect of development on the site is reaching a point where an environmental statement could be necessary to assess its visual impact, it is not considered on balance that this stage has yet been reached.

For the reasons set out in this letter, taking into account the selection criteria in Schedule 3 of the Regulations and the terms of the European Directive, the development would not be likely to have significant effects on the environment generating a need for an EIA by virtue of factors such as its nature, size, location or the characteristics of the potential impact.

Accordingly, in exercise of the powers conferred on the Local Planning Authority by Regulation 5 of the Regulations and the powers delegated to me by the Council, I hereby confirm that the proposed development described is not "EIA development" within the meaning of the 2017 Regulations.

A copy of this Screening Opinion has been placed on the Planning Register.

Yours sincerely,

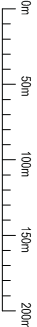
Tim Horsman

Tim Horsman
Planning Development Control Manager

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All building materials, components and workmanship to comply with current construction legislation, Building Regulations, Codes of Practice and where appropriate manufacturers recommendations.
This drawing is to be used in conjunction with all related drawing issues.



Revisions

Rev	Description	On	Date
-	First Issue	RJB	xx.06.17
A	Updated to suit revised building plan	RJB	06.07.17
B	Updated to suit UK Concept plan	RJB	18.07.17
C	Updated	RJB	26.07.17

Project
Biggin Hill Airport

Future Hangar Development

Drawing Title

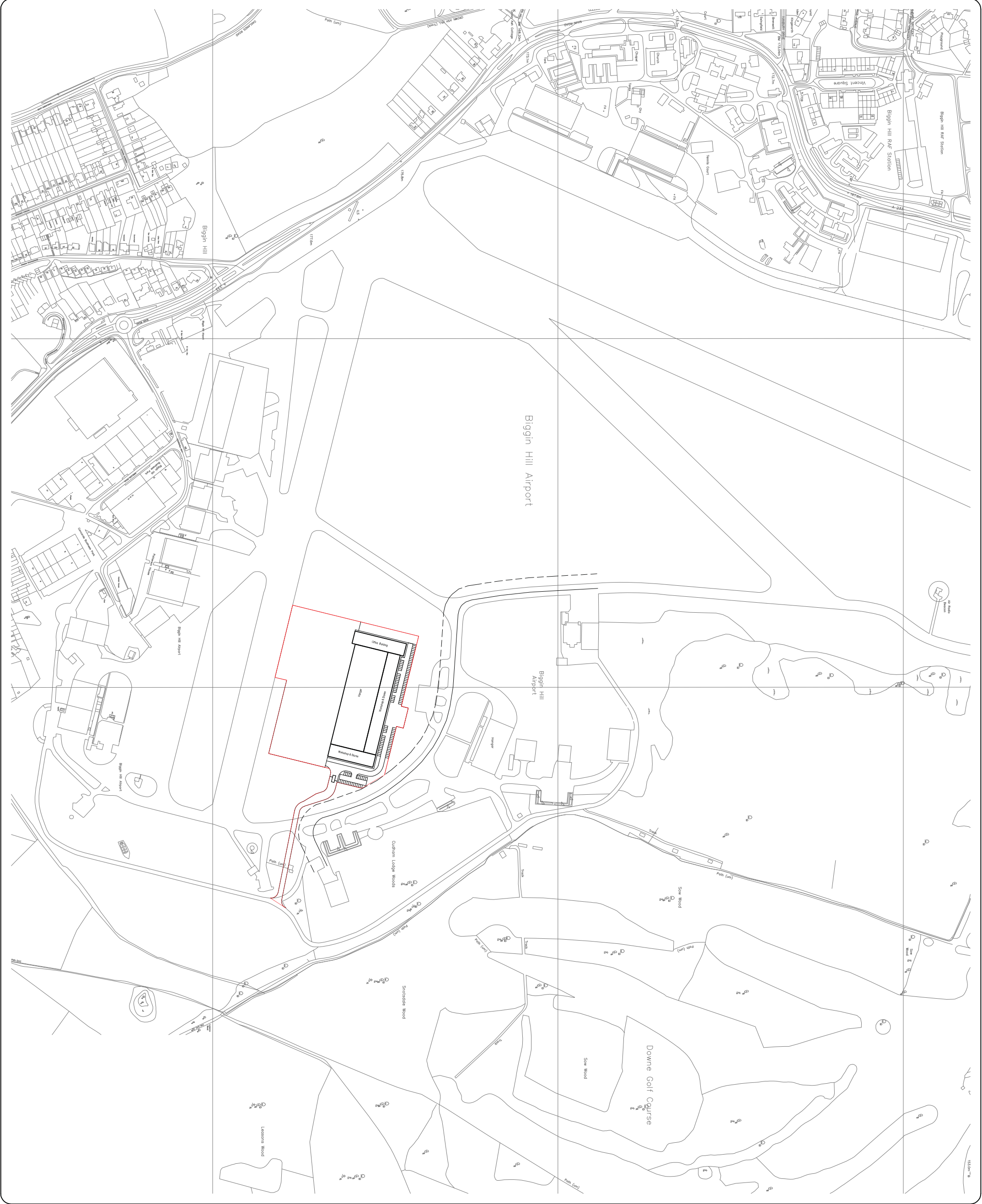
Location Plan



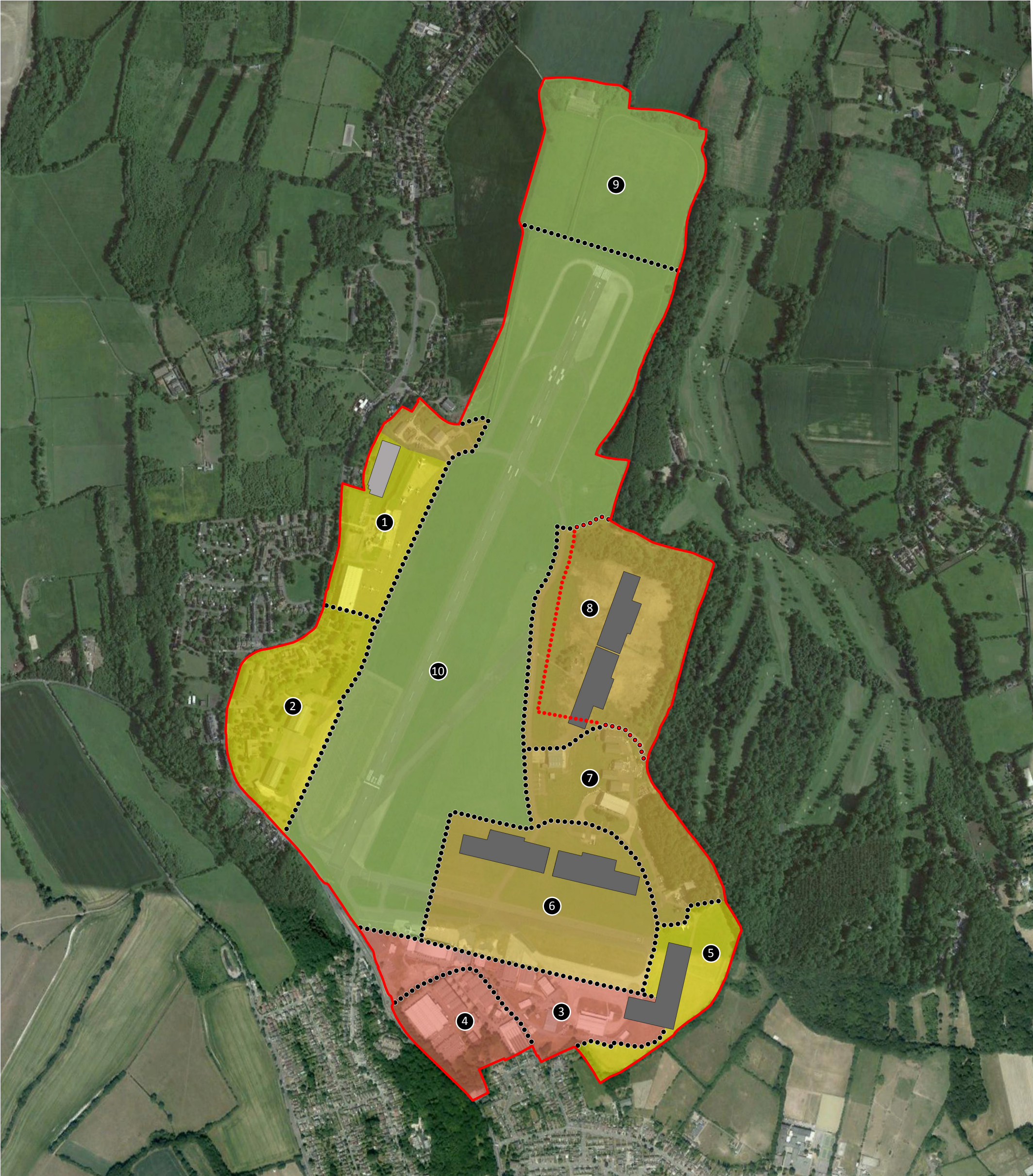
Civils Contracting Ltd
3 Arches Park, Broadbridge Road, East Peckham, Kent TN12 5HP
Tel - 01622 879303 Fax - 01622 879301

Scale
1:2500 @ A1
Date
June 2017

Drawing No
TEQ1824-102
Rev
C



APPENDIX 4 – Large Scale Hangar Potential



Key

- Airport’s proposed SOLDC boundary
- Land parcels reference
- Land parcel boundaries
- Council’s proposed SOLDC boundary
- Existing non-Green Belt land
- Common ground on Green Belt release
- Common ground on retained Green Belt land
- Airport’s suggested further Green Belt release
- Indicative location of potential OEM hangars
- Large scale hangar under construction

Land Parcel	Area (ha)
1	11.85
2	13.58
3	11.09
4	7.30
5	7.12
6	22.83
7	13.14
8	23.36
9	18.64
10	81.60

0200m400m600m

ProjectLondon Biggin Hill

TitlePotential Locations of Large Scale OEM Hangars

ClientLondon Biggin Hill Airport

Date16.11.2017

Scale1:10000 @ A3

Drawn byLH

Drg. NoPS10500-104 C

N

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APPENDIX 5 – Proposed Airport Policy

“The Council will support air-side development which complements, assists or serves the aviation functions, services or occupiers of an Airport. The Council will adopt a flexible approach on non-air-side land elsewhere within the SOLDC to allow for related or complementary employment generating uses alongside community, education, non-airport and business related uses.”

