

***Planning for  
Growth: Further  
Capacity Review of  
Biggin Hill  
Strategic Outer  
London  
Development  
Centre***

***October 2015***

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# 1 INTRODUCTION

London Borough of Bromley (LBB) commissioned AECOM to undertake an additional capacity assessment of the Biggin Hill Strategic Outer London Development Centre (“SOLDC”), incorporating land at the Airport and surrounding commercial areas. This work is an extension of the original ‘Planning for Growth’ study (URS July 2014) that included an analysis of two key employment areas in the borough, the Cray Corridor and Biggin Hill SOLDC.

The Planning for Growth study found that the extant planning framework for Biggin Hill was inadequate and out of step with current national and regional policy, most notably in respect of the SOLDC designation within the London Plan. One of the recommendations within the study was to look in more detail at the constraints to future growth at the SOLDC, including a detailed assessment of the Green Belt.

This capacity and constraints review encompasses a targeted assessment of the Biggin Hill SOLDC, as a specialised employment area serving the aviation and high-tech industry. This study has considered the potential for growth against a number of designations including landscape, Green Belt, heritage and nature conservation.

The key aims of this report are:

- To review new evidence, legislation, policy or guidance released since July 2014 (insofar as it relates to the SOLDC);
- Analyse the principal physical and policy constraints in greater detail;
- Conduct a detailed Green Belt review of land within the proposed SOLDC area<sup>1</sup> (incorporating recommendations for new defensible boundaries); and
- Highlight the potential capacity for development for the individual land parcels.

Growth within the Biggin Hill SOLDC is forecast to be in the region of 70,000 – 117,000m<sup>2</sup> of new/refurbished commercial floorspace (including west camp and the business area to the south of the Airport) and approximately 2,300 – 3,600 new jobs by 2031<sup>2</sup>. The Planning for Growth Study found the Locate Partnership’s<sup>3</sup> growth plans to be ambitious, but the methods used to calculate growth were reasonable with the analysis representing a positive view of the future growth potential.

AECOM analysis highlighted deficiencies with current policy framework: the majority of the site is washed over with Green Belt which can lead to delays and increased risks for existing businesses wishing to expand and potential new businesses wishing to relocate at Biggin Hill. In addition, the existence of a historical Article 4 direction and protocol prevent permitted development in particular locations. Even with these restrictions removed our previous study calculated that permitted development rights for non-aviation industrial and office buildings could only deliver approximately 14,000 m<sup>2</sup> of extra commercial floorspace<sup>4</sup>.

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<sup>1</sup> As illustrated in the Local Plan Draft Policies and Designations document ( published for consultation from 10/02/14 to 24/03/14)

<sup>2</sup> Figures included in the Locate Partnership’s growth plan.

<sup>3</sup> [http://www.locateatbigginhill.co.uk/the-facts/?doing\\_wp\\_cron=1444634749.7453169822692871093750](http://www.locateatbigginhill.co.uk/the-facts/?doing_wp_cron=1444634749.7453169822692871093750)

<sup>4</sup> This legislation was recently consolidated: The Town and Country Planning (General Permitted Development) (England) Order 2015

## 2 METHODOLOGY

The assessment has been restricted to the land within the proposed SOLDC area due to the fact that the aviation led growth cannot be located on alternative sites elsewhere in the borough.

### 2.1 Approach

Our approach for this review has been developed with regard to best practice and statutory guidance<sup>5</sup> and can be broken down into the following 4 stages:

#### Stage 1: Context update

Outputs:

- Desktop review of updates to legislation, guidance, case law, newly published best practice for plan-making.

#### Stage 2: Identification of baseline constraints

*Prior to assessing the site against the Green Belt purposes, a baseline study of the existing landscape components and character and visual amenity of the site was carried out in consideration of: site context and planning designations; topography; vegetation; roads; public rights of way and access; settlement and land-use; landscape character; and visual amenity.*

Outputs:

- GIS analysis (utilising a 1.5km study area) to highlight key characteristics/designations (e.g. landscape, land use, ecology, heritage, topography)
- Landscape character analysis

#### Stage 2: Landscape assessment

*Site visits were subsequently undertaken by AECOM planning and landscape specialists to verify the findings of the desktop research and gain an improved appreciation of issues such as value of the countryside, heritage assets, key landscape characteristics, landscape condition, views and visual sensitivity. Certain fieldwork elements were based on the professional judgement of AECOM's experienced planning and landscape consultants, for aspects such as how an existing feature lays within the landscape or openness. The fieldwork was supplemented with a photographic record.*

Outputs:

- Photographic record and commentary on character and views of airport and wider study area
- Zones of Theoretical Visibility (ZTVs) based upon the Locate Partnership's concept plan for growth

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<sup>5</sup> Including the Planning Practice Guidance website; and PAS, POS and RTP1 guidance and briefing notes.

### Stage 3 Targeted Green Belt Review

Outputs:

- Reasons and evidence for why exceptional circumstances exist to review the current Green Belt boundary
- Assessment of SOLDC land against the five 'purposes' of Green Belt and fundamental aims and characteristics of Green Belt

### Stage 4 Capacity analysis and Green Belt boundary commentary

*This stage of work allowed for the assessment of what quantum of development may be possible for each land parcel in light of the Green Belt assessment. Factors that fed into this assessment include heritage and countryside considerations and potential mitigation measures which may allow for growth.*

Outputs:

- Analysis of the Locate Partnership's concept plan and ramifications for the Local Plan
- Discussion on potential Green Belt boundary amendments

## **2.2 Targeted Green Belt Review Method**

The first step is to divide the SOLDC area into distinct land parcels for the purposes of conducting the Green Belt assessment against the five purposes of Green Belt. This is necessary as the NPPF advises that local planning authorities should *"define boundaries clearly, using physical features that are readily recognisable and likely to be permanent"*. As such it would be prudent to ensure prominent physical features do not bisect any parcels that should have been considered independently.

The review utilises OS maps, aerial photos, GIS and site visits to help in assessing the constituent parcels of land.

Table 1 sets out the detailed considerations and criteria that were utilised for each of the Green Belt purposes. The final criteria for site assessment were agreed with LBB and developed in line with NPPF and best practice considerations<sup>6</sup>. Previous Green Belt reviews have varied in their detailed interpretation of the five purposes of Green Belt. Interpretation of the purposes is central to the assessment of each parcel. The following assumptions have fed into this targeted review:

- **Checking unrestricted sprawl of large built up areas** - Green Belts were used primarily to contain towns and cities to stop them from swallowing neighbouring towns and villages. However, evolution of the planning system means that unrestricted sprawl is less likely than it was in the middle of the 20<sup>th</sup> Century. As such this purpose is principally concerned with checking ribbon development and ensuring towns and cities remain compact. This purpose is tested by assessing the level of containment at Biggin Hill.
- **Preventing neighbouring towns from merging** - this purpose reflects the concept that settlements should maintain separation and their own characters. Many district-wide Green Belt studies assess this purpose using distance thresholds. This is not practicable for this targeted review. A qualitative commentary is included, covering aspects such as perception and whether development would erode the separate characters and lead to merging.

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<sup>6</sup> Planning for a Better Future, Our planning manifesto for the next government: We need to talk about the Green Belt (Planning Officers Society, March 2015); and Planning on the Doorstep: The Big Issues – Green Belt (Planning Advisory Service, February 2015)

- **Safeguarding the countryside from encroachment** - The word encroachment implies intrusion, therefore the assessment considers whether the land loses its countryside character. Assuming the term “urban fringe” is intended to confer not just adjacency with an urban area but a change of character to have a more urban feel, the first criterion is considered sound. The same applies to the second, which deals with the degree of openness or containment. The third criterion on strong boundaries is also robust. The criteria taken together are considered to be well founded.
- **Preserving the setting and character of historic towns** - Some Green Belts were designated specifically to protect the setting of historic cities. The setting of historic towns and cities should be considered in terms of views into the settlement from the adjoining countryside. It is unlikely that this purpose will be engaged unless there are clearly matters of historic setting which are addressed by a parcel's inclusion as Green Belt. The important matter then is that when it comes to the practice of assessment, the focus is clearly on the historic setting of the town. Precedents from elsewhere assess the role Green Belt plays in preserving the historic core of settlements and the setting of key historic features (such as Conservation Areas, Listed Assets and Key Views). However, the targeted Green Belt review does not assess land parcels outside of the SOLDC or beyond clearly defined Airport/SOLDC boundaries.
- **To assist in urban regeneration, by encouraging the recycling of derelict and other urban land** - Green Belt is considered to play an important role in recycling derelict and other urban land, by restricting the availability of Greenfield Sites. However, the extent to which the Green Belt restricts the availability of Greenfield Sites is of greater importance in some areas than others; specific local circumstances and regeneration priorities outweigh the protection of the Green Belt at certain locations.

Table 1 Matters considered for each of the relevant Green Belt purposes

Green Belt Purpose (as set out in NPPF)	Criteria
To check the unrestricted sprawl of large built-up areas	<ul style="list-style-type: none"> <li>▪ What role does the site play in preventing ribbon development and non-compact development?</li> <li>▪ Is there evidence of ribbon development or non-compact development?</li> <li>▪ Provides a barrier between an existing large urban area and open Green Belt;</li> <li>▪ Is the parcel surrounded by Green Belt land on all sides?</li> <li>▪ Does the parcel provide a barrier between two or more distinct existing settlements?</li> <li>▪ Does the parcel provide a barrier between two or more parts of the same large urban area?</li> </ul>
To prevent neighbouring towns merging into one another	<ul style="list-style-type: none"> <li>▪ What role does the land play in preventing Biggin Hill and adjacent villages from merging and narrowing the gap between them?</li> <li>▪ Would a reduction in the gap between Biggin Hill and nearby towns and villages compromise the openness of the Green Belt?</li> <li>▪ Are there features which could continue to perform the separating role?</li> </ul>
To assist in safeguarding the countryside <sup>7</sup> from encroachment	<ul style="list-style-type: none"> <li>▪ Are there clear strong and robust boundaries to contain development and prevent encroachment in the long term?</li> <li>▪ Are there already significant urbanising influences?</li> <li>▪ Has there already been encroachment by built development?</li> <li>▪ Would encroachment of the built environment harm features of nature conservation value?</li> </ul>

<sup>7</sup> The Oxford English Dictionary defines countryside as "the land and scenery of a rural area". The Countryside and Rights of Way Act 2000 provides a definition of 'open country' as - "Land which is wholly or predominantly mountain, moor, heath or down". This also includes woodland, land around rivers/canals and foreshore. Natural England maintains a national map 'open access land' which includes 'open country' <https://www.gov.uk/open-access-land-management-rights-and-responsibilities>

Green Belt Purpose (as set out in NPPF)	Criteria
	<ul style="list-style-type: none"> <li>Would development affect opportunities for accessing the wider countryside?</li> <li>Does the parcel contain any rural/countryside characteristics (e.g. areas of nature conservation value, condition of vegetation, landscape character, agricultural value etc.)?</li> </ul>
To preserve the setting and special character of historic towns	<ul style="list-style-type: none"> <li>Are there views and links to historic towns/villages and does the landscape contribute to the special character of Bromley and distinct settlements?</li> <li>Are there views and links to the historic centres?</li> <li>Would the quality of the historic core or Conservation Area within a settlement be compromised by development?</li> <li>Does the area contain Scheduled Monuments, Areas of Archaeological Significance or Historic Parks and Gardens?</li> <li>What is the heritage value of settlements? Important heritage features? Historic links?</li> </ul>
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	<ul style="list-style-type: none"> <li>All land within the Green Belt (to some extent) assists with this purpose; as such observations and comments are included to assess the parcels contribution to this purpose.</li> </ul>

Using the criteria, a judgment has been made in regards to the contribution each parcel of land makes against each of the Green Belt purposes. The sites contribution against the particular Green Belt purpose is assessed as red (little or no contribution), amber (makes some contribution) or green (makes a significant contribution) as shown in table 2 below.

Table 2 Suitability against Green Belt purposes

Contribution	Degree of importance to meeting the Green Belt purpose
Site makes a significant contribution to Green Belt purpose	High
Site makes some contribution to Green Belt purpose	Medium
Site makes little or no contribution to Green Belt purpose	Low

The NPPF does not stipulate that any one purpose is more important than another. Therefore there is no weighting of the individual purposes. A composite judgement is made of the parcel's overall significance in terms of contribution to Green Belt, made in the context of the fundamental aim and characteristics of Green Belt. If a parcel makes a significant contribution against a single purpose it may on its own constitute a significant contribution based on the land parcel's context<sup>8</sup>.

The NPPF states that local authorities should promote sustainable patterns of development (paragraph 84) and that the additional considerations included in paragraph 85 should inform boundary alterations:

<sup>8</sup> For example, if the land parcel in question is the only tract of land preventing two towns from merging together it would be less relevant that the land in question did not make any contribution to preserving the setting and special character of a historic town or preventing encroachment into the countryside.

- *Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
- *Not include land which it is unnecessary to keep permanently open;*
- *Where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- *Make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;*
- *Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
- *Define boundaries clearly; using physical features that area readily recognisable and likely to be permanent.*

The second bullet (regarding not including land which is unnecessary to keep permanently open) and last bullet (which requires the definition of clear boundaries using readily recognisable physical features) are of particular relevance where exceptional circumstances can be demonstrated and an area of Green Belt land is altered. Development must meet the aims of sustainable development as envisaged in the NPPF. The release of Green Belt land is a strategic decision based on an assessment of sustainable locations for new development.

## 3 CONTEXT UPDATE

Since publication of the previous AECOM (then URS) report in July 2014 there have been a number of developments of relevance to the SOLDC, including updates to planning legislation, statutory guidance and new case law, newly published non-statutory guidance, and consultations surrounding proposed changes to the Airport's opening hours. This section includes information on matters not previously addressed in the high-level Planning for Growth evidence base report. This section includes updates on:

- Biggin Hill Airport variation to operating hours
- House of Commons Transport Committee - Smaller airports
- Planning Practice Guidance
- Aviation Policy Framework
- Ministerial Statements
- House of Commons Communities and Local Government Committee - The Operation of the National Planning Policy Framework
- The Town and Country Planning (General Permitted Development) (England) Order 2015

### 3.1 Biggin Hill Airport variation to operating hours

In November 2014, Biggin Hill Airport Limited (BHAL) formally applied to LBB to vary their opening hours. The proposal to increase the operating hours was also accompanied by a series of other proposals. Prior to sending this letter BHAL conducted their own consultation and engaged Populus to conduct a poll to garner feedback from the public on the Airport's draft proposals, the feedback was positive as evidenced by the consultation feedback report<sup>9</sup> (November 2014). Subsequent to the BHAL letter, LBB held its own formal consultation with local residents and businesses. There were a total of 41,711 responses, the largest single response to any Bromley consultation, in which 31,500 (76%) residents registered their support for the proposals<sup>10</sup>. There then followed a report (DRR15/035) to Full Council. After a meeting of Full Council on 25<sup>th</sup> March 2015<sup>11</sup>, LBB's Executive agreed - *"That subject to agreement from the airport to all concessions conditions and obligations which can reasonably be required in consideration for agreeing a variation to the Operating Criteria in the Third Schedule to the lease and subject to the Executive being satisfied with the concessions conditions and obligations negotiated, the executive should then agree in principle to the extension of hours and consult again with Council before the final decision is made"*.

### 3.2 House of Commons Transport Committee - Smaller airports

On 9<sup>th</sup> March 2014, the House of Commons Transport Select Committee<sup>12</sup> released their Ninth Report of Session 2014–15, entitled *Smaller Airports*<sup>13</sup>. In this inquiry, the committee of MPs defined a smaller airport as one with a Civil Aviation Authority (CAA) licence which handled fewer than 5 million passengers per annum. The nine busiest UK airports—London Heathrow, London Gatwick, Manchester, London Stansted, Edinburgh, London Luton, Birmingham, Glasgow and Bristol—fell outside the scope of the inquiry. The 40 or so smaller airports that were in the scope of the inquiry ranged in size from Newcastle, which handled 4.4 million passengers in 2013, to Lydd,

<sup>9</sup> [http://www.bigginhillfuture.co.uk/links/Consultation\\_report\\_press\\_FINAL.pdf](http://www.bigginhillfuture.co.uk/links/Consultation_report_press_FINAL.pdf)

<sup>10</sup> <http://www.bigginhillfuture.co.uk/consultation-results.html> AND <http://cds.bromley.gov.uk/documents/s50028812/Biggin%20Hill%20Airport%20Proposal%20to%20vary%20the%20%20Operating%20Hours.pdf>

<sup>11</sup> Report DRR15/035 <http://cds.bromley.gov.uk/mgAi.aspx?ID=33594>

<sup>12</sup> The Transport Committee is appointed by the House of Commons to examine the expenditure, administration, and policy of the Department for Transport and its Associate Public Bodies.

<sup>13</sup> <http://www.publications.parliament.uk/pa/cm201415/cmselect/cmtran/713/713.pdf>



which handled 1,000 passengers. MPs considered smaller airports which did not handle scheduled passenger flights but which hosted services such as business aviation, express air freight, and general aviation or helicopter operations. The inquiry received a written submission from BHAL<sup>14</sup>, which noted that: *“Development of all airports, large and small, frequently involves removal of airport land from the Green Belt, either altogether or leaving a Green Belt fringe. The Green Belt issue is a hurdle that has and always will delay the attraction and development of new inward investment and increasingly Local Authorities are amending this matter in their Local Plans”*.

The key findings within the report, of relevance to Biggin Hill, are summarised below:

- Smaller airports are economic and social enablers. They facilitate vital national and international connections for people and businesses in the UK. Smaller airports are economic enablers. They allow businesses and people to transport themselves, visitors, customers and products nationally and internationally, which facilitates both exports and internal investment. In addition, smaller airports are themselves employers and often provide a focus for clusters of aviation-related businesses...Smaller airports are crucial to the maintenance and growth of regional economies
- Smaller airports grew rapidly in the late 1990s and early 2000s. Over that period, airports outside London grew more rapidly than those serving the capital, because passenger numbers increased in line with the expansion of low-cost, short-haul airlines. Smaller airports numbers at smaller airports began to decline in 2005. That trend was exacerbated by the 2008 recession, since when smaller airports have suffered disproportionately compared with larger airports. John Spooner, Chairman, Regional and Business Airports Group, observed that *“small airports caught pneumonia when the rest of the country caught a cold.”* The Department for Transport (DfT) acknowledged that *“recent economic conditions have been challenging for the UK’s aviation sector.”*
- Smaller airports are relatively fragile commercial entities. While they operate from fixed locations and catchment areas, airlines and other aviation businesses are highly mobile and can swiftly adjust or relocate their services in line with demand. Smaller airports that rely on services provided by a single airline are especially vulnerable to fluctuations in market conditions. In response, some smaller airports have diversified the range of aviation-related activities conducted from and at their sites to maximise resilience and commercial viability. Darren Caplan, Chief Executive, Airport Operators Association (AOA), pointed out that *“Bournemouth has successfully diversified; they have one third commercial, a third general aviation and a third cargo. Humberside has gone strongly into helicopters to supplement its income. Biggin Hill and Farnborough both have a strong aerospace component on their sites.”*
- Since the 2008 recession, Bristol Filton, Coventry, Plymouth, Penzance and Manston airports have all closed either completely or closed to commercial traffic. In addition, Blackpool closed to commercial traffic in the course of the inquiry. Although the circumstances varied in those cases, the closures were ultimately a result of airport owners and/or airlines concluding that commercial services were no longer viable. Iain Osbourne, Group Director for Regulatory Policy, CAA, asserted that *“it is very hard to kill an airport”*.<sup>10</sup> He argued that *uncommercial airports often “drop down to a semi-dormant state” but are “still there ... disciplining the market.”* The argument that a dormant airport is still economically significant because airlines might choose to fly from it in the future cannot be sustained if temporarily uncommercial airports are developed for housing, as happened at Bristol Filton and has been proposed at Manston. Because airports, by their nature, occupy

<sup>14</sup><http://data.parliament.uk/WrittenEvidence/CommitteeEvidence.svc/EvidenceDocument/Transport/Smaller%20airports/written/13560.html>



large, flat sites, they are attractive to developers, especially in areas of high housing demand.

- The UK contains a relatively large number of airports in a fairly small geographical area. Indeed, it contains more airports per head than comparable EU member states. The Under-Secretary of State, DfT, Robert Goodwill MP, observed that *“we live in a vibrant, competitive environment, unlike many parts of Europe where local authorities control their airports ... I am very comfortable with the fact that we have a large number of smaller airports.”* The Chartered Institute of Logistics and Transport (CILT) spelled out the practical consequences of the Minister’s observation: *“Smaller airports vary in terms of financial viability, but there are a number which are not and probably never will be profitable. There are some regions where there are more airports than are really needed, and where the case for public financial support is not strong. An airport cannot survive if airlines and other aircraft operators do not want to use it.”*
- The committee concluded: *“We welcome the range of consumer choice provided by the comparatively large number of smaller airports in the UK. The Government is rightly cautious about making direct interventions in this market, which rewards enterprise and provides consumers with competitive prices and choice. There is no case for a general policy of state intervention to keep all smaller airports open.”*

### 3.3 General Aviation Strategy

The General Aviation Strategy<sup>15</sup> (March 2015) details the government’s vision for the sector:

*The Government’s vision is of the UK being the best place in the world for GA as a flourishing, wealth generating and job producing sector of the economy.*

The strategy sets out how the Government plans to achieve those aims and details current reforms achieved and planned on a department by department basis. A research paper<sup>16</sup> produced by York Aviation (February 2015), studying the general aviation sector from an economic perspective, informed the strategy. In order to achieve the strategy’s vision the Government will undertake and inspire work across four areas, two of which are relevant to Local Planning Authorities:

- *Stimulating employment in GA in terms of how many people are involved and how much they participate;*
- *Supporting infrastructure that is appropriate in its extent, capability and location to deliver a mixed, modern fleet of aircraft flying between appropriately equipped aerodromes across well-defined airspace.*

The Government’s commitments attached to these aims have already been partially delivered as the PPG was updated (March 2015) to include positive support for GA aerodromes (see 4.4). In addition, the Government have committed to:

- circulate more detailed GA sector guidance from the General Aviation Awareness Council to planning authorities in England on GA matters; and
- encourage more proactive engagement between local aerodromes, local communities, Local Planning Authorities and LEPs.

The strategy touches on a number of examples that are hindering development of GA and aerodromes across the county, factors included:

<sup>15</sup> <https://www.gov.uk/government/publications/general-aviation-strategy>

<sup>16</sup>

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/417060/Economic\\_Impact\\_of\\_General\\_Aviation\\_in\\_the\\_UK.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/417060/Economic_Impact_of_General_Aviation_in_the_UK.pdf)

- A perception that low priority was being given to the strategic importance of GA aerodromes in the course of planning decisions;
- Opposition to new airfields is often high within local communities where potential benefits are poorly understood;
- Existing GA airfields find it difficult to gain planning consent to develop their existing facilities;
- York Aviation found through surveying airfields that many felt they did not have the full support of local authorities and Local Enterprise Partnerships (LEPs); and
- The need for new housing is resulting in development pressure on airfields of marginal viability/profitability due to their appeal to developers (flat sites that are usually well located for services).

The recent GA economic research into GA recommends that the Government should continue to encourage planning authorities to ensure that they take the economic and employment role local airfields play into account in their Local Plans and in all planning decisions. The strategy notes that:

*Existing GA airfields also find it difficult to gain planning consent to develop their existing facilities. Aviation is a sector where technology changes very quickly and in order to survive businesses must adapt to reflect this progress, such as by improving hanger facilities or creating all-weather runways. Improvements to infrastructure at airfields are increasingly vital to their ability to survive. Often airfields are situated on Green Belt land, which enjoys the highest protection in planning terms and where development is restricted.*

The Government are bullish about the growth prospects of the sector; this cannot be ignored and is a clear signal to the market and Local Planning Authorities to consider the strategy in addressing local issues.

*There are a number of reasons to be optimistic;*

- *UK GA has a strong international reputation;*
- *English is the language of international aviation;*
- *There are more private flights to and from London than any other European city;*
- *The UK has the second largest aerospace industry in the world reinforced by our strategic vision for UK aerospace – an ambitious plan to keep our industry at the forefront of the global market.*

*We are optimistic about the prospects for the future success of the sector because of the increased demand which we now expect from the growing economy and this Government's reform programme for GA.*

### 3.4 Planning Practice Guidance

On 6 March 2014 the Department for Communities and Local Government (DCLG) launched the planning practice guidance (PPG), a web-based resource. The PPG provides supplementary statutory guidance to the National Planning Policy Framework (NPPF)<sup>17</sup> and is periodically updated.

<sup>17</sup> The previous Planning for Growth Study highlighted those key extracts from the NPPF and London Plan insofar as they relate to Biggin Hill Airport and adjacent commercial areas.

The PPG clarifies that the NPPF should be read as a whole and that Green Belts should only be altered in exceptional circumstances<sup>18</sup>.

*Do housing and economic needs override constraints on the use of land, such as Green Belt?*

*The National Planning Policy Framework should be read as a whole: need alone is not the only factor to be considered when drawing up a Local Plan.*

*The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. Such policies include those relating to sites protected under the Birds and Habitats Directives, and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park or the Broads; designated heritage assets; and locations at risk of flooding or coastal erosion.*

*The Framework makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.*

After publication of the Smaller Airports report and the General Aviation Strategy, there followed a revision to the PPG section on *Transport evidence bases in plan making and decision taking* section of the website. The guidance was published on 13<sup>th</sup> March 2015 to provide supplementary guidance to the NPPF paragraphs 17, 33 and 160 (which cover planning for economic growth, airports and involving business bodies in plan making):

*What should be considered in regard to the development of airport and airfield facilities and their role in serving business, leisure, training and emergency service needs?*<sup>19</sup>

*Aviation makes a significant contribution to economic growth across the country, including in relation to small and medium sized airports and airfields (aerodromes). An aerodrome will form part of a larger network. Local planning authorities should have regard to the extent to which an aerodrome contributes to connectivity outside the authority's own boundaries, working together with other authorities and Local Enterprise Partnerships as required by the National Planning Policy Framework. As well as the National Planning Policy Framework, local planning authorities should have regard to the Aviation Policy Framework, which sets out Government policy to allow aviation to continue making a significant contribution (National Planning Policy Framework paragraph 160).*

*A working or former aerodrome could be put forward for consideration as a site for mixed use development (National Planning Policy Framework paragraph 17) that includes continuing, adapting or restoring aviation services in addition to other uses.*

This new guidance suggests that a mixed use approach could be put forward for adaptation and restoration efforts at existing aerodromes. Equally it emphasises the importance of noting the content of the Aviation Policy Framework and engaging with key business aviation stakeholders.

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<sup>18</sup> Paragraph: 044 (Reference ID: 3-044-20141006) Do housing and economic needs override constraints on the use of land, such as Green Belt?

<sup>19</sup> Paragraph: 012 Reference ID: 54-012-20150313 (Revision date: 13 03 2015)

<http://planningguidance.planningportal.gov.uk/blog/guidance/transport-evidence-bases-in-plan-making/transport-evidence-bases-in-plan-making-guidance/>

### 3.5 Aviation Policy Framework

The Aviation Policy Framework (March 2013) recognises the importance of Local Plans and the role of LPAs in decision making, principally around matters such as safeguarding, public safety, noise and climate change. It also includes the Government's vision and objectives for aviation and a number of relevant impacts for LPAs preparing plans with airports/aerodromes. Below are a number of key extracts from the Aviation Policy Framework insofar as they relate to the role of the LPA and local plan making:

#### *Maintaining a viable network of business and general aviation*

1.86 Across the UK there is a network of aerodromes of varying sizes, from airports in Northern Ireland, Scotland, Wales and regional airports in England to small business and general aviation (GA) airfields into which GA aircraft can readily gain access. While almost all of these are privately owned and operated, maintaining access to such a national network is vital to the continuing success of the sector.

1.87 Business and general aviation connects many UK and international destinations that do not have, and are unlikely to develop, scheduled air services or other direct transport links. GA aerodromes can also complement commercial air transport and provide increased connectivity at important hubs such as London. These links are particularly important for local businesses. Ninety-six per cent of city pairs served by business aviation have no scheduled connection.<sup>20</sup>

3.21 The NPPF expects local planning policies and decisions to ensure that new development is appropriate for its location and the effects of pollution – including noise – on health, the natural environment or general amenity are taken into account. This does not rule out noise-sensitive development in locations that experience aircraft noise. In the same way that some people consider themselves annoyed by aircraft noise even though they live some distance from an airport in locations where aircraft are at relatively high altitudes, other people living closer to an airport seem to be tolerant of aircraft noise and may choose to live closer to the airport to be near to employment or to benefit from the travel opportunities.

3.22 There can also be other good economic or social reasons for noise sensitive developments to be located in such areas. However, reflecting Government noise policy, the NPPF is quite clear that the planning system should prevent new development being put at unacceptable risk from, or being adversely affected by, unacceptable levels of noise pollution. Local planning authorities therefore have a responsibility to ensure that the land use element of the balanced approach is implemented in the context of their local plan policies, including any on noise. People considering moving to an area which may be affected by existing aircraft noise also have a responsibility to inform themselves of the likely impacts before moving to the area, and airport operators should ensure that all necessary information to inform such decisions is easily accessible.

#### *Planning policies*

5.6 In preparing their local plans, local authorities are required to have regard to policies and advice issued by the Secretary of State. This includes the Aviation Policy Framework, to the extent it is relevant to a particular local authority area, along with other

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<sup>20</sup> The Role of Business Aviation in the European Economy, Oxford Economics, October 2012

relevant planning policy and guidance. The Aviation Policy Framework may also be a material consideration in planning decisions depending on the circumstances of a particular application.

### 3.6 House of Commons Communities and Local Government Committee - The Operation of the National Planning Policy Framework

The House of Commons Communities and Local Government Committee published its report into The Operation of the National Planning Policy Framework. This report included a section that touched on the current role and approach to Green Belt (our emphasis added):

*78. In October 2014, the Government issued new planning practice guidance which underlined its “commitment to protect the green belt from development”.<sup>198</sup> The Minister, Mr Lewis, told us that the guidance confirmed “exactly, word for word, what is in the NPPF [and was] not new in the sense of new policy or anything of the sort”.<sup>199</sup> For the most part, the guidance does reiterate the wording of the NPPF. It adds, however, that local authorities should “take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need”. This sentence goes beyond the wording of the NPPF, arguably increasing protection to the green belt..*

*79. In our opinion, the green belt has for many years played an important part in preventing sprawl and ensuring settlements retain their distinct identity. The NPPF is right to say that it should only be altered in exceptional circumstances. Certainly, councils should not look to alter the green belt when making individual planning decisions. This does not, however, mean that the green belt should stick forever to its existing boundaries. Councils should amend their green belts if local circumstances demand it. In local plans, councils set out a strategic vision for their area. It seems to us sensible that, as part of this process, they examine their green belts and consider whether they are fit for purpose and whether adjustments to the size and boundaries should be made. We encourage all councils, as part of the local planning process, to review the size and boundaries of their green belts. They should then make any necessary adjustments in their local plan. The rigorous requirements of public consultation, examination by an inspector and adoption by the council will ensure that any changes have been subject to thorough consideration.*

The Government’s response<sup>21</sup> on the topic of Green Belts reaffirmed the current policy and guidance:

*21. ...the Government is also clear that the responsibility for a review of the Green Belt rests with the local planning authority and must be conducted through the local plan process of consultation and examination. The rationale for this approach is to ensure the Green Belt is considered in the round of all the other planning issues the Council is addressing in its Local Plan and on an authority-wide, and indeed a cross-authority basis where appropriate.*

*73. The Green Belt prevents urban sprawl and unnecessary encroachment into the countryside. Preservation of openness around our cities is highly valued not only by central Government but by local communities too. It is Government policy that Green Belt boundaries, once established, should be altered only through the preparation or review of the Local Plan, which allows for full community consultation and engagement. Local planning authorities are responsible for their Green Belts. Any review of the Green Belt is entirely a*

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<sup>21</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/408087/CM9016\\_Web.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/408087/CM9016_Web.pdf)



matter for them. The Government published guidance on 6 October 2014 which re-affirmed this position, and made clear that once housing need has been assessed, the local planning authority should plan to meet that identified need and in doing so take account of any constraints such as Green Belt which indicate that development should be restricted, and which may restrain the ability of an authority to meet its need.

### **3.7 The Town and Country Planning (General Permitted Development) (England) Order 2015**

The Airport benefits from permitted development rights under Part 8 of The Town and Country Planning (General Permitted Development) (England) Order 2015<sup>22</sup> (GPDO). The provisions of the GPDO are quite complex, but essentially state that certain types of development are generally permitted provided they are carried out on operational land by a relevant airport operator or its agent in connection with the provision of services and facilities at a relevant airport. Biggin Hill Airport and Biggin Hill Airport Ltd (BHAL) are defined as a 'relevant airport' and a 'relevant operator' respectively. 'Relevant airport' means an airport to which Part V of the Airports Act 1986 applies and 'relevant airport operator' means a relevant airport operator within s57 of the Airports Act 1986.

#### *PART 8 Transport related development*

#### **Class F – development at an airport Permitted development**

**F.** *The carrying out on operational land by a relevant airport operator or its agent of development (including the erection or alteration of an operational building) in connection with the provision of services and facilities at a relevant airport.*

#### **Development not permitted**

**F.1** *Development is not permitted by Class F if it would consist of or include— (a) the construction or extension of a runway; (b) the construction of a passenger terminal the floor space of which would exceed 500 square metres; (c) the extension or alteration of a passenger terminal, where the floor space of the building as existing at 5th December 1988 or, if built after that date, of the building as built, would be exceeded by more than 15%; (d) the erection of a building other than an operational building; or (e) the alteration or reconstruction of a building other than an operational building, where its design or external appearance would be materially affected.*

#### **Condition**

**F.2** *Development is permitted by Class F subject to the condition that the relevant airport operator consults the local planning authority before carrying out any development, unless that development falls within the description in paragraph F.4.*

#### **Interpretation of Class F**

**F.3** *For the purposes of paragraph F.1, floor space is calculated by external measurement and without taking account of the floor space in any pier or satellite. F.4 Development falls within this paragraph if— (a) it is urgently required for the efficient running of the airport, and (b) it consists of the carrying out of works, or the erection or construction of a structure*

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<sup>22</sup> Previously Schedule 2, Part 18 of the Town and Country Planning (General Permitted Development) Order 1995

*or of an ancillary building, or the placing on land of equipment, and the works, structure, building, or equipment do not exceed 4 metres in height or 200 cubic metres in capacity.*

- *Class G air traffic services development at an airport*
- *Class H air traffic services development near an airport*
- *Class I development by an air traffic services licence holder within an airport*
- *Class J development by an air traffic services licence holder on operational land*
- *Class K development by an air traffic services licence holder in an emergency*
- *Class L development by an air traffic services licence holder involving moveable structures*
- *Class M development by the Civil Aviation Authority for surveys etc.*
- *Class N use of airport buildings managed by relevant airport operators*

### ***Interpretation of Part 8***

***O. For the purposes of Part 8—***

*“air traffic services” has the same meaning as in section 98 of the Transport Act 2000 (air traffic services)(a);*

*“air traffic services licence holder” means a person who holds a licence under Chapter 1 of Part 1 of the Transport Act 2000(b);*

*“air transport services” has the same meaning as in section 82 of the Airports Act 1986(c);*

*“operational building” means a building, other than a hotel, required in connection with the movement or maintenance of aircraft, or with the embarking, disembarking, loading, discharge or transport of passengers, livestock or goods at a relevant airport;*

*“relevant airport” means an airport to which Part 5 of the Airports Act 1986 (status of certain airport operators as statutory undertakers etc.)(d) applies;*

*“relevant airport operator” means a relevant airport operator within the meaning of section 57A of the Airports Act 1986 (scope of Part 5); and*

*“transport legislation” means section 14(1)(d) of the Transport Act 1962 (supplemental provisions relating to the Boards’ powers)(e) or section 10(1)(x) of the Transport Act 1968 (general powers of Passenger Transport Executive)(f).*

F.1 stipulates certain types of development are specifically excluded as ‘permitted development’. Certain other types of development are permitted including: works urgently required for the efficient running of the airport, as well as the erection of air navigation equipment subject to certain restrictions on size.

To satisfy Condition F.2 a consultation agreement is in place between LBB and BHAL (to ensure that consultation occurs, and as part of this, LBB undertakes to formally inform BHAL of its view as to whether it agrees the works are permitted development or not within a specific time period.

In addition, as a separate process and unrelated to the Planning Acts, since the LBB owns the freehold of the airport, it is necessary for BHAL to gain landlord's consent from LBB under the terms of the lease between LBB and BHAL.

In January 2001 the Secretary of State confirmed an Article 4 Direction relating to land in the Green Belt between the control tower and the adjacent Conservation Area of the former RAF

quarters. The Direction removes permitted development rights, thereby requiring planning permission to be sought for any subsequent proposals in this area. LBB will also assess any proposals under permitted development on the need for an Environmental Impact Assessment and in light of the voluntary consultation agreement between BHAL and LBB.

In addition to the 2001 Article 4 direction there is an additional protocol that was signed on 24th January 1996 which regulates the permitted development rights for “defined airport sensitive locations”, with the expectation that permitted development rights will not be used by BHAL. In these locations, the protocol indicates that development subject to permitted development rights should only be located in those areas for overriding operational reasons and when options for location elsewhere have been exhausted, or if it would reduce the impact of the airport on those locations. Sensitive locations covered by this protocol include a small element of South Camp, all of West Camp, the wooded SINC in East Camp and the terminal area. It is expected within the protocol that for the purposes of operating the test of sensitivity, *“in considering the degree to which Biggin Hill airport has exhausted alternative locations, LB Bromley will have regard to issues of economic viability.”*

A recent example of permitted development is the new RizonJet facility. However as highlighted in the previous study, even with the updated GPDO, the Article 4 direction and protocol can militate against development opportunities. This point was also made by BHAL in their Economic Growth Plan report (2014):

*Whilst some development at the Airport can (and has been) achieved using permitted development rights...the procedure is not considered sufficient to be able to deliver the Airport's development aspirations. The Airport has in the past experienced considerable delays in seeking confirmation from LBB that the development falls within...permitted development. There has often been debate between the Airport and the Council as to whether certain types of development fall under the definition...this includes debates about whether office accommodation within a hangar is being used specifically for airport operations rather than a wider corporate use – this militates against its reliable use for OEMs or AOCs who might, quite sensibly and as at other European Airports, co-locate their HQ or management functions or component manufacture at one of their sites as part of a hangar development (It is of note that similar arrangements increasingly common on large scale B8 warehouse developments, where a logistics company will locate its HQ function by including an office development within its warehouse footprint). There is also the risk (as has happened in the past) that LBB imposes an Article 4 Direction on land at the Airport removing its permitted development rights. Whilst the permitted development entitlement has been and continues to be helpful to the Airport in achieving minor operational developments in a timely manner, it provides little certainty to global investors that they will be able to realise larger scale development expeditiously.*

*In addition, there are a number of potential uses within the planning unit of the Airport which do not fall within the definitive categories under Part 18 of the GPDO, but are required to meet the business needs identified by global companies which the Airport wishes to attract. There are also a number of airport-associated uses which provide supporting facilities to companies located on the Airport (such as hotel, restaurant, conferencing facilities) which would not be permitted development under Part 18 of the GPDO...It is therefore clear that...GPDO is not adequate to meet the business needs identified in section 3.0 [section on Estimating growth levels at Biggin Hill in the Economic Growth Plan]*



This 2015 instrument consolidates the regulations concerned with General Permitted Development in England, as well as introducing a number of policy changes. The 2015 GPDO has made the previously time-limited permitted development rights for extensions to non-domestic premises (offices, shops, industrial buildings and schools etc.) permanent. This has some benefits for non-airport land elsewhere in the SOLDC, but again it would not be capable of providing the transformational change envisaged for the SOLDC.

## 4 BASELINE

### 4.1 Planning, heritage and environment designations

The analysis of baseline constraints includes a commentary on:

- Regional and local landscape character;
- Nature conservation; and
- Heritage designations.

These aspects are illustrated on the following figures within the Appendix:

- Figure 1 – Site Location Map: Operational Area;
- Figure 2 – Existing Policy Designations;
- Figure 3 – Topography;
- Figure 4 – Aerial Photography; and
- Figure 5 – Natural Landscape Areas.

### 4.2 National Character Area Profile, Natural England

As part of Natural England's responsibilities as set out in the Natural Environment White Paper<sup>23</sup>, Biodiversity 2020<sup>24</sup> and the European Landscape Convention<sup>25</sup>, Natural England sets out profiles for England's 159 National Character Areas (NCAs). These are areas that share similar landscape characteristics, and which follow natural lines in the landscape rather than administrative boundaries, intended to provide a decision making framework for the natural environment. The profiles are also aimed at helping to inform choices about how land is managed and can change.

The whole of the study area lies within NCA 119: North Downs, an extensive, narrow, landscape belt extending from Farnham in the west, to the White Cliffs of Dover in the east. The defining characteristic of NCA 119 described by Natural England is: *'Cretaceous Chalk forms the backbone of the North Downs. A distinctive chalk downland ridge rises up from the surrounding land, with a steep scarp slope to the south providing extensive views across Kent, Surrey and Sussex and across the Channel seascape to France.'* Key characteristics applicable specifically to the study area include the following:

- *'The broad dip slope gradually drops towards the Thames and the English Channel, affording extensive views across London and the Thames Estuary. The carved topography provides a series of dry valleys, ridges and plateaux';*
- *'...The undulating topography of the dip slope has also been etched by streams and rivers, today forming dry valleys, some of which carry winterbournes that occasionally flow in the dip slope, depending on the level of the chalk aquifer';*
- *'Woodland is found primarily on the steeper slopes of the ... valley sides and areas of the dip slope capped with clay-with-flints. Well-wooded hedgerows and shaws are an important component of the field boundaries, contributing to a strongly wooded character. Much of the woodland is ancient';*

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<sup>23</sup> The Natural Choice: Securing the Value of Nature, Defra (2011; URL: [www.official-documents.gov.uk/document/cm80/8082/8082.pdf](http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf))

<sup>24</sup> Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services, Defra (2011; URL: [www.defra.gov.uk/publications/files/pb13583-biodiversity-strategy-2020-111111.pdf](http://www.defra.gov.uk/publications/files/pb13583-biodiversity-strategy-2020-111111.pdf))

<sup>25</sup> European Landscape Convention, Council of Europe (2000; URL: <http://conventions.coe.int/Treaty/en/Treaties/Html/176.htm>)

- *'Ancient paths, drove roads and trackways, often sunken, cross the landscape and are a distinctive feature of the dip slope. Defensive structures such as castles, hill forts and Second World War installations, and historic parks, buildings and monuments are found throughout';*
- *'Small, nucleated villages and scattered farmsteads including oasts and barns form the settlement pattern, with local flint, chalk and Wealden brick the vernacular materials'; and*
- *'In the western part of the area, around and to the west of Sevenoaks and into Surrey, there is increased urban development'.*

### 4.3 London's Natural Signatures: The London Landscape Framework (2011)

London's Natural Signatures is a framework produced by Natural England to re-establish the relationship between the built and the natural aspects of London, since London is clearly characterised more by its townscapes and buildings than by its natural landscapes. The aim of the report is to have a tool that can help planners and developers reflect the natural landscapes more clearly when regenerating and renewing the Capital. The study area covers parts of three Natural Landscape Areas (NLAs) within LBB (Figure 5 – Natural Landscape Areas); from south to north, these are:

- NLA 22: Upper North Downs Dip Slope – this comprises the majority of the study area including the whole of Biggin Hill Airport;
- NLA 21: Lower North Downs Dip Slope – this extends east-west across the northern part of the study area; and
- NLA 19: South London Pebbly Sands – a small part of this NLA extends into the northern end of the study area, with NLA 21 wrapping around three sides.

Key aspects of these areas are summarised below.

#### NLA 22: Upper North Downs Dip Slope

*'The topography reflects the distinctive, rolling upland relief typical of chalk downland landscapes. There is little surface drainage, but the combination of structural folding and glacial erosion has produced uneven slopes, carved into sweeping forms by branching trough-shaped dry valleys ... the dip slopes to the east (near Biggin Hill) have only dry valley systems.'*

*'These upper chalk slopes have superficial deposits of clay-with -flints, which produce soils deep enough to support extensive woodlands. As a result, this part of the North Downs has a relatively wooded character, with remnant fragments of extensive ancient oak-ash-beech-yew woodlands. Elevated land with a relatively even slope has been developed as airfields at Biggin Hill...'*

The Natural Signature of NLA 22 is stated as this: *'Ancient woodland and chalk grassland on steep valley slopes emphasise the striking, sculpted chalkland relief'. 'The form and alignment of remnant ancient woodlands and hedgerows often emphasises the sculpted, steep dry valley landforms of the upper chalk dip slopes ... There are superb views across the London basin from many of the valley ridges...'*

The area described as Downe Bank and Cudham Valley North, located on the eastern edge of the study area, is highlighted as one of a number of examples of key *'natural landscape features'*.

#### NLA 21: Lower North Downs Dip Slope

NLA 21 stretches *'...east-west along the North Downs, north of the Wooded Chalk Slopes (NLA 22) and south of ... the South London Pebbly Sands (NLA 19). This is the lower dip slope of the North Downs and the land rises gently to the south. The upper reaches of the ... Ravensbourne*

*and Cray rivers have cut down through the chalk bedrock to form a series of ridges and valleys along the slope. The areas underlain by chalk have the distinctive concave-convex rolling relief of chalk uplands, with dry valleys and broad, rounded ridges.'*

The Natural Signature of NLA 21 is stated as this: *'A diverse landscape with a transition from heath, scrub and woodland on the lower slopes to more open farmland and scattered ancient woodlands on the rising chalklands to the south'. It is 'a transitional landscape, with strong variations in landscape pattern between the heathy land on the lower slopes and the distinctive chalk landscapes on the rising slopes of the North Downs ... with mosaics of heath, grassland, scrub and woodland on the lower slopes grading to rolling, more open farmland with areas of chalk grassland, scrub and woodland on the slopes of well-defined dry chalk valleys'.*

#### NLA 19: South London Pebbly Sands

NLA 19 rises gradually from the River Thames at Greenwich towards the dip slope of the North Downs at Croydon and Bromley, and is bordered to the west and east by the valleys of the rivers Ravensbourne and Cray respectively.

The Natural Signature of NLA 19 is stated as: *'Historic heathy commons and extensive woodland on elevated land with views over the Thames Basin from ridgetops and summits'.* To this day *'the area is still characterised by a high percentage of surviving woodland and common land'.* The part of NLA 19 falling within the study area is a complex area comprising the wooded knoll on which is situated the Grade I listed Holwood Mansion and its Grade II listed park and garden, along with Caesar's Camp Scheduled Monument and Keston Common.

#### **4.4 Sites of Importance for Nature Conservation (SINCs)**

SINCs are designated by a panel of local ecological professionals. It is a non-statutory designation, although SINCs are still afforded a high level of protection within the planning system. Development that negatively impacts on a SINC will only be permitted in exceptional circumstances and where mitigation can be proven from the beginning. In London, SINCs are designated as one of a hierarchy of types:

1. Sites of Metropolitan Importance are selected on a London-wide basis.
2. Sites of Borough Importance (grade 1 and 2) are selected from candidates within each borough, so ensuring that borough has some sites identified.
3. Sites of Local Importance are the lowest tier of sites, selected to redress any remaining local deficiencies.

Selection of and changes to sites of borough or local importance is now the responsibility of the local boroughs. The London Wildlife Sites Board (LWSB) provides guidance on a selecting and confirming SINCs designed to ensure consistency and that the process is compliant with various policy frameworks. The GLA updated their Advice Note for the *Process for selecting and confirming Sites of Importance for Nature*. The selection of Borough or Local sites, or changes to Borough or Local sites is a matter for local decision-making. The primary role of the LWSB is to ensure consistency of approach across London. The LWSB can offer generic advice and views on the approach taken by a Borough and its local partners, and provide validation of the process if required.

SINCs, when correctly designated, should be protected, i.e. shouldn't be directly impacted by development. There are two policy protection mechanisms for SINCs. The first is through the National Planning Policy Framework which states that *'if significant harm resulting from a*

*development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused'. The second, in the case of Bromley, is through the London Plan policy, which states:*

#### *POLICY 7.19 BIODIVERSITY AND ACCESS TO NATURE*

##### *Planning decisions*

*D On Sites of Importance for Nature Conservation development proposals should:*

*b give strong protection to sites of metropolitan importance for nature conservation (SMIs). These are sites jointly identified by the Mayor and boroughs as having strategic nature conservation importance*

*c give sites of borough and local importance for nature conservation the level of protection commensurate with their importance.*

*E When considering proposals that would affect directly, indirectly or cumulatively a site of recognised nature conservation interest, the following hierarchy will apply:*

*1 avoid adverse impact to the biodiversity interest*

*2 minimise impact and seek mitigation*

*3 only in exceptional cases where the benefits of the proposal clearly outweigh the biodiversity impacts, seek appropriate compensation.*

The SINC adjacent to Biggin Hill Airport is the *West Kent Golf Course and Down House* SINC. It is 134.89 ha in size and currently designated as Metropolitan Grade, a site of metropolitan importance (SMI) for nature conservation in the London Plan. The Greenspace Information for Greater London (GiGL) website is the capital's environmental records centre, it includes the following description of the SINC:

*The West Kent Golf Course and adjacent scout camp include one of London's largest ancient woodlands, which is particularly diverse owing to the varied topography and mixture of soil types. This complex of chalk grassland, scrub and woodland includes one of the London Wildlife Trust's most valued nature reserves, Down House (now the Darwin Museum) and its partially lawned grounds are of tremendous scientific importance through their association with Charles Darwin, who lived and worked here for forty years. There is an entrance fee to Down House, which is owned and managed by English Heritage. The whole area is within the World Heritage Site UK nomination for 2009.*

*The rich woodland plant life includes the orchids white helleborine and twayblade, and the nationally rare powdercap strangler fungus. Part of the ancient woodland has been replanted with beech and Scots pine. The chalk grassland supports wild thyme and yellow-rattle and boasts large numbers of pyramidal, bee and common spotted-orchids, while butterflies include the nationally declining small blue, grizzled skipper and dark green fritillary. The site also supports several protected reptiles...*

Additionally, LBB's own internal assessment of the SINC in 2011 points out that:

*Older parts of the woodland are beech with old hazel coppice (Corylus avellana) and hawthorn (Crataegus monogyna) understory and patches of ancient woodland indicator ground flora including bluebell (Hyacinthoides non-scripta), yellow archangel (Lamiasstrum*

*galeobdolon*), wood millet (*Milium effusum*) wood sorrel (*Oxalis acetosella*) and wood sedge (*Carex sylvatica*). On wetter soils, the woodland is composed of downy birch (*Betula pubescens*) and alder (*Alnus glutinosa*) with areas of bracken (*Pteridium aquilinum*)<sup>26</sup>.

Other relevant extracts from the NPPF regarding nature conservation are as follows:

*109 The planning system should contribute to and enhance the natural and local environment by:*

- *protecting and enhancing valued landscapes, geological conservation interests and soils;*
- *recognising the wider benefits of ecosystem services;*
- *minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*
- *preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and*
- *remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.*

*110 In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework.*

*114 Local planning authorities should:*

- *set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure;*

*117 To minimise impacts on biodiversity and geodiversity, planning policies should:*

- *plan for biodiversity at a landscape-scale across local authority boundaries;*
- *identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;*
- *promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan;*
- *aim to prevent harm to geological conservation interests; and*
- *where Nature Improvement Areas are identified in Local Plans, consider specifying the types of development that may be appropriate in these Areas.*

*118 When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:*

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<sup>26</sup> LBB Site of Metropolitan Importance for Nature Conservation (Site Reference: M18) Citation last edited: 25/11/2011

- *if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
- *..development proposals where the primary objective is to conserve or enhance biodiversity should be permitted;*
- *opportunities to incorporate biodiversity in and around developments should be encouraged;*
- *planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss..*

The SINC to the east of the SOLDC is primarily protected due to its status as an Ancient Woodland. Cudham Lodge Woods (within the proposed SOLDC boundary) forms part of the continuous wooded area of the SINC, its eastern portion is designated “Ancient Woodland”<sup>27</sup>. Cudham Lodge Woods is recorded on “*An Entirely New & Accurate Survey Of The County Of Kent, With Part Of The County Of Essex, by William Mudge, 1801*”. The western portion was partially felled during the World War II (see Figure 7 overleaf), however, this western portion (as like the other parts of the SINC) is identified as Deciduous Woodland (a UK priority habitat) – see Figure 6 overleaf. Standing Government advice for Ancient Woodland states that:

*Planning authorities and developers should start by looking for ways to avoid the development affecting ancient woodland or veteran trees e.g. by redesigning the scheme... As ancient woodland and veteran trees are irreplaceable, discussions on compensation should not form part of the assessment of the merits of the development proposal... Compensation measures are always a last resort because ancient woodland and veteran trees are irreplaceable. These measures can only partially compensate for damage. Compensation measures could include: planting new native woodland<sup>28</sup>; restoring or managing other ancient woodland<sup>29</sup>; replacing lost veteran trees<sup>30</sup>.*

There are minimal opportunities to compensate for any loss of woodland within the SOLDC area.

<sup>27</sup> According to standing Government advice (*Ancient woodland and veteran trees: protecting them from development*, Natural England and Forestry Commission 3 August 2015 <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>) ‘Ancient woodland’ is any wooded area that has been wooded continuously since at least 1600 AD. It includes:

- ‘ancient seminatural woodland’ mainly made up of trees and shrubs native to the site, usually arising from natural regeneration
- ‘plantations on ancient woodland sites’ - areas of ancient woodland where the former native tree cover has been felled and replaced by planted trees, usually of species not native to the site

<sup>28</sup> Planting new woodland is not a direct replacement for lost or damaged ancient woodland. But planning authorities can accept large scale woodland planting as a compensation measure, alongside other measures. This could be on soil that has been moved from the destroyed area of ancient woodland.

<sup>29</sup> Restoring plantations on ancient woodland sites, and improving the way nearby ancient woodland sites are managed, are acceptable ways to compensate for loss or damage to ancient woodland, alongside other measures.

<sup>30</sup> Planting young trees of similar species can help compensate for removed veteran trees. The new trees should be near to the trees they’re replacing.



Figure 6 Woodland adjacent to Biggin Hill SOLDC (Source: Magic Maps)

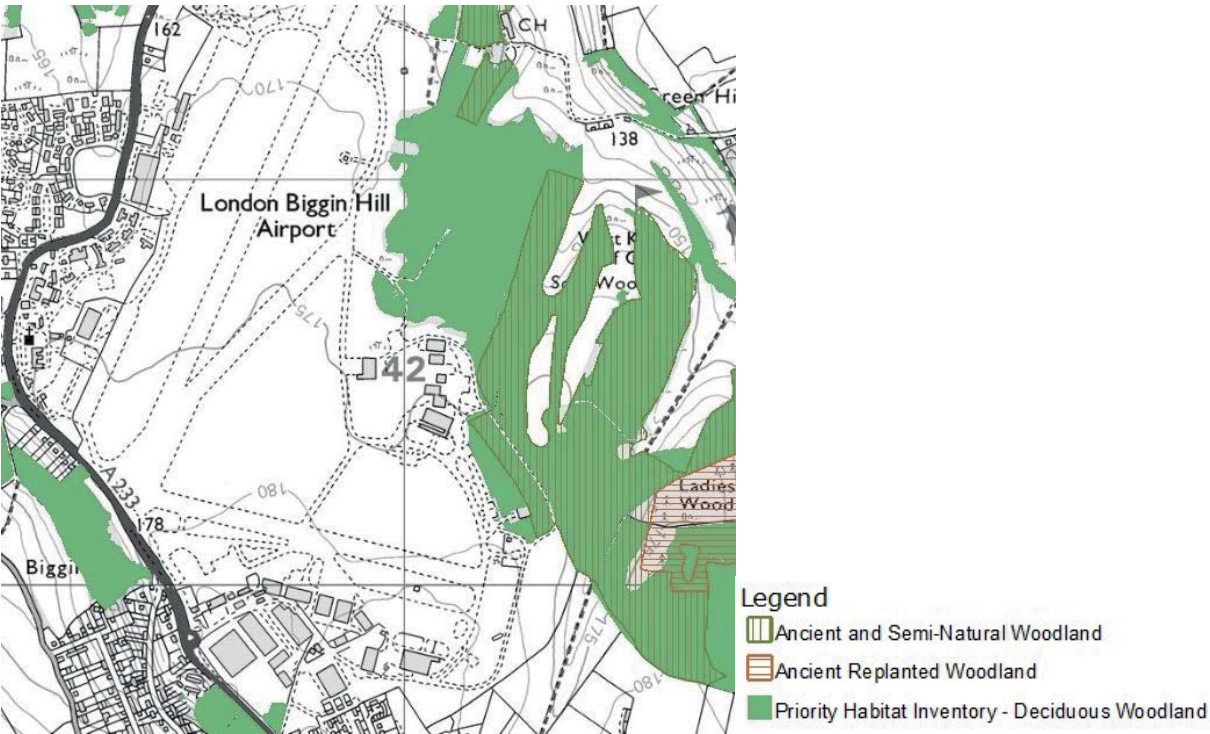


Figure 7 Aerial photograph of Biggin Hill 27/06/1941 (Source: Historic England)





## 4.5 Heritage designations

RAF Biggin Hill is designated as a Conservation Area and includes a number of listed buildings; it is also washed over by Green Belt, which in the absence of any specific policies has prevented any meaningful redevelopment. The Local Plan offers opportunities to look again at how local policy can support growth, regeneration and renewal at West Camp for the next 15 years.

The relevant piece of legislation for the Conservation Area is The Planning (Listed Buildings and Conservation Areas) Act 1990 – Section 66 of the Act establishes a general duty when considering whether to grant planning permission for a development which affects a listed building, to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historical interest which it possesses. Section 72 of the Act establishes a general duty when considering whether to grant planning permission for a development that affects any building or land within a conservation area, to have special regard to the desirability of preserving or enhancing the character or appearance of that area.

There is no current conservation area management plan. This would clarify for all the character and appearance of RAF Biggin Hill Conservation Area as well as the significance and setting of the listed buildings within it and identify agreed policies for managing change and complement any emerging policy in the Local Plan. Although not explicitly mentioned in the above Act, Historic England guidance makes clear that Conservation Areas include their 'settings', the area surrounding the asset in which that asset can be 'experienced'. What this means has not been defined by Historic England however it can include views into the Conservation Area (or towards the asset), noise and ambience, vegetation, dust and other environmental factors.

AECOM recommend that the LPA brings forward a Conservation Area management plan to accompany any alterations to the Green Belt boundary and new Local Plan policies for West Camp. This would help to guide decision making and provide guidance to interested parties.

## 4.6 High-level transport assessment

The following is a summary of the key improvements that may be required based upon the high-level modelling conducted in the previous AECOM study (2014). This information illustrates transport constraints to help inform final capacity decision making. This information is important for considering sustainable development over the plan period.

To deliver the proposed growth at the SOLDC (based on the concept plan); improvements to five junctions are likely to be required to enhance capacity.

Modelling suggests that junctions 1.1, 1.2, 1.3 and 1.5 (see figure 8) will operate over their recommended or maximum capacity thresholds in the future case, irrespective of the additional growth proposed for the corridor. Traffic generated from the SOLDC, particularly for Phase 3 of the concept plan development will serve to reinforce or exacerbate issues at these junctions, and will also result in junction 1.6 operating over its recommended capacity.

Improvements will be required to enable the delivery of growth at the SOLDC, as well as to cater for background growth in traffic, in order to maintain good access to the airport and the proposed new employment opportunities. The stage at which these improvements are needed differs by location.

The B265 Heathfield Road and Downe Road are used by a number of vehicles to travel between the A233 Croydon Road and A21 Farnborough Way respectively. Future growth at the SOLDC will

increase traffic along these routes, it will be important to consider the impact on these routes and associated junctions as part of a future study or application.

Subject to greater consideration of the area's movement strategy, the opportunity may be afforded to deliver corridor urban traffic control, through a system such as SCOOT or MOVA. This will allow greater management of traffic flows through the area, allowing the system to respond to fluctuations in traffic. It may also afford the opportunity to deliver bus priority through the junctions.

A focus should be placed on improving public transport accessibility in order to reduce the level of trip generation associated with the growth in jobs. Enhancements in public transport accessibility will be important and focus should be placed on improving bus frequencies and connections to key transport interchanges e.g. New Addington, Bromley South and East Croydon.

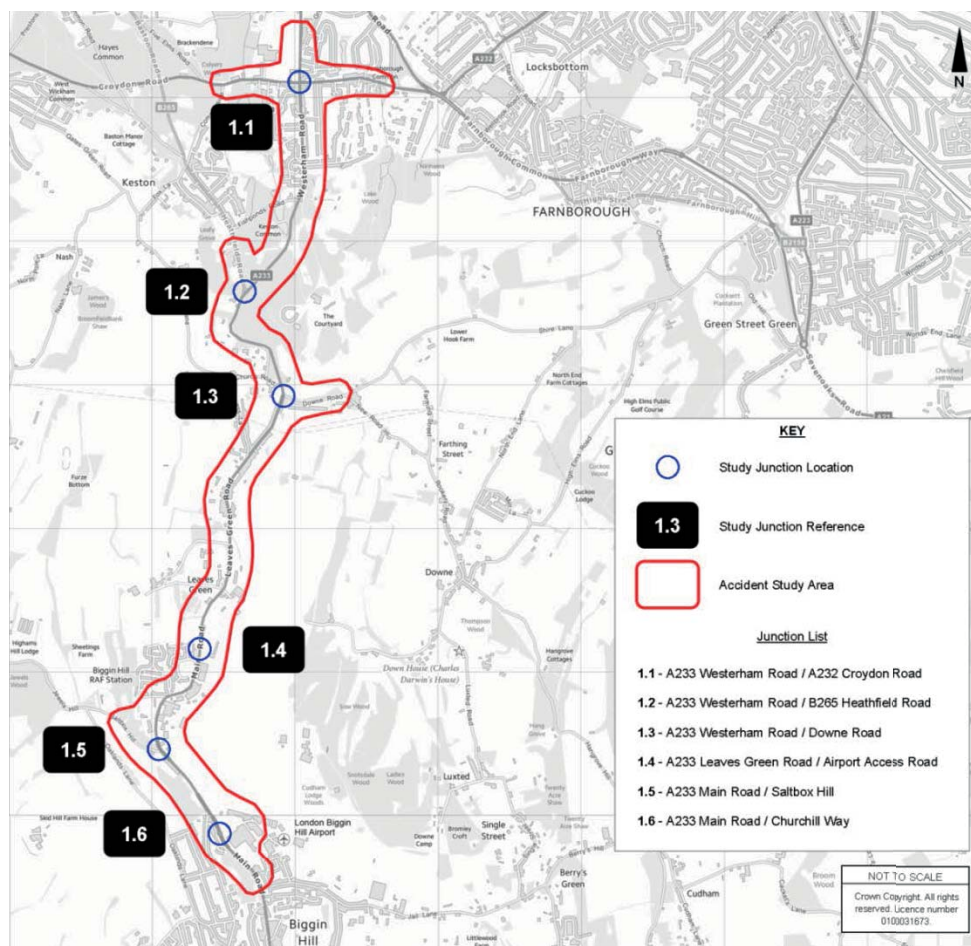
Further review of the site's traffic generation is recommended as more detail emerges regarding the masterplan, furthermore the development of potential junction designs, as well as costing of the options, is recommended.

Table 3 Potential transport improvements

Location	Potential Improvements	Potential Delivery	Reasoning
<b>A233 Westerham Road / A232 Croydon Road</b>	<ul style="list-style-type: none"> <li>Removal of right turners from Croydon Road</li> </ul>	Prior to occupation of Phase 1	<ul style="list-style-type: none"> <li>The junction operates at capacity in the 2014 baseline case</li> <li>Limited number of right turners in existing case, although observed to limit saturation flow/block straight ahead movements</li> </ul>
	<ul style="list-style-type: none"> <li>No further upgrade has been identified at this stage, as it will be subject to securing additional land to enhance capacity</li> </ul>	Prior to occupation of Phase 3	<ul style="list-style-type: none"> <li>Subject to the delivery of the first improvement, the requirement for additional improvements are likely to be deferred until delivery of Phase 3 at the SOLDC</li> </ul>
<b>A233 Westerham Road / Heathfield Road</b>	<ul style="list-style-type: none"> <li>Full signalisation or conversion to roundabout</li> <li>Inclusion of left turn filter</li> <li>Change to priority on Heathfield Road if signal option delivered</li> </ul>	Prior to occupation of Phase 1	<ul style="list-style-type: none"> <li>The junction operates over capacity in the existing case with long queues on the Heathfield Road arm</li> <li>Concerns that extended queuing may result in drivers taking increased risks when turning from Heathfield Road</li> </ul>
<b>A233 Westerham Road / Downe Road</b>	<ul style="list-style-type: none"> <li>Full signalisation of the junction or expansion of the roundabout</li> <li>Delivery of two lanes at the stop line on each arm</li> </ul>	Prior to occupation of Phase 2	<ul style="list-style-type: none"> <li>Junction operating at capacity in 2014 baseline, although moderate queuing observed</li> <li>By delivery of Phase 1, queuing will worsen but LBB may judge that the queuing remains manageable</li> </ul>
<b>A233 Main Road / Saltbox Hill</b>	<ul style="list-style-type: none"> <li>Full Signalisation</li> <li>Two lanes at the stop line on each arm</li> <li>Possible left turn filter from Saltbox Hill Road</li> </ul>	Prior to occupation of Phase 2	<ul style="list-style-type: none"> <li>In the AM peak, Saltbox Hill Road is operating at capacity in the existing case</li> <li>By 2019 with the addition of Phase 1, the same arm will operate over capacity of the AM Peak baseline</li> <li>LBB may judge that the queuing remains manageable and therefore delivery of improvements set for between Phase 1 and 2</li> </ul>

<b>A233 Main Road / Churchill Way</b>	<ul style="list-style-type: none"> <li>Upgrades to the southern arm of the roundabout</li> </ul>	During Phase 3	<ul style="list-style-type: none"> <li>The addition of Phase 3 traffic to the network results in the southern arm of the roundabout operating above recommended capacity thresholds</li> </ul>
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Figure 8 – Biggin Hill corridor – transport assessment area



#### 4.7 Adjacent business area

The Airport Trading Estate and Concord Business Area is an employment area 7.16 ha in size made up from:

- 3.15 ha warehousing;
- 2.21 ha office;
- 0.19 ha residential; and
- 1.56 ha vacant industrial land

The employment area is made up of a combination of airport and local occupiers. The concept plan currently envisages approximately 3,200 m<sup>2</sup> of new associated manufacturing floorspace on the vacant industrial land. The cluster appears to be suitable for both office and industrial uses as found in the previous study and is not located in Green Belt.

Figure 9 – Adjacent business area: Airport Trading Estate: potential of non-airside outside of the Green Belt

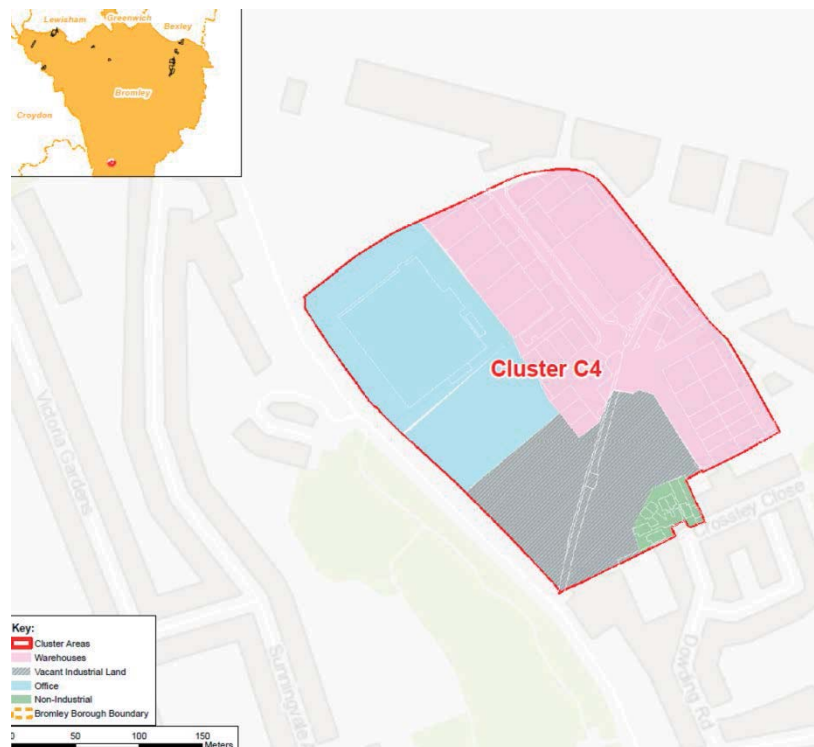


Table 4 Suitability or potential suitability for B1a (office) Uses

C4	Emp. Area	X	✓	✓	✓	✓	X	✓	✓	X
Cluster	Designation	PTAL Level 4+	Quality of Environment >50% Good or V. Good	Building Condition > 50% Good or V. Good	No Physical Site Constraints	Adjacent to Compatible Land Uses	Established Office Location (> 25% B1 Floorspace)	Adequate Servicing	Adequate Parking Facilities	Good/V.Good Access to Facilities and Amenities

Cluster attributes for B1a uses between 50-75% positive = Medium Green (suitable characteristics for such use)

Table 5 Cluster suitability or potential suitability for B1c/B2/B8 (industrial) uses

C4	Emp. Area	✓	X	X	✓	✓	✓	✓	✓	✓	✓
Cluster	Designation	Direct Strategic Road Access	Direct Waterways / Wharves Access	Direct Railhead Access	>50% of Environment in Good/ V.Good Condition	>50% of Buildings in Good/ V.Good Condition	No Physical Site Constraints	No Bad Neighbourhood Issues impacting negatively on sensitive adjacent receptors	Adequate Servicing of Businesses	Adequate Parking	>50% of cluster actively used for B1c/B2/ B8 employment uses

Cluster attributes for B1c/B2/B8 uses greater than 75% positive = Dark Green (greatest suitability characteristics for such use)

The airport is not currently of a scale which encourages lots of non-airside suppliers to locate here due to current economies of scale. Larger airports can attract ancillary businesses such as catering, freight forwarding, parts distribution, aircraft manufacturers servicing and training centres, aircraft part suppliers etc.

Demand for industrial / warehousing space is often led by a need to be at a particular location, followed by such things as cost, specification and available workforce. Locations such as Croydon, Dartford, Greenwich and Erith benefit from large industrial areas. These areas benefit from either swift access to Central London, access to markets (populated boroughs close to London), or access to the M25. Biggin Hill does not benefit from such advantages, and this means that significant growth in non-airport related industrial space in the future is unlikely.

The case for demand for non-air-side commercial buildings off airport is not so convincing. Clearly with Formula One racing there is a palpable precedent to support the case of an organisation wanting access to an airstrip, but the previous study commented that there was limited evidence to support the case for anything other than slow take-up of accommodation at this location. Furthermore, general industrial demand appears to be saturated at present, until the airport reaches a critical mass.

As such it is unlikely to offer significant redevelopment opportunities in the short term serving the SOLDC, due to lack of demand and the need for growth in airside to create the critical mass. However, should the concept plan be partially realised this will have complementary benefits to this area and the SOLDC as a whole.

# 5 LANDSCAPE ASSESSMENT

## 5.1 Local Landscape Character Areas

A number of landscape character types (LCTs) have been identified within the study area. Some of these occur in more than one location and therefore the LCTs have been further categorised into landscape character areas (LCAs), described in detail below. Figure 10 – Local Landscape Character Areas is within the Appendix and sets out each of the LCT areas at the SOLDC.

LCT 1: Airfield – open, featureless expanse of grassland with runways, terminal buildings and large-scale hangar buildings.

- LCA 1: Biggin Hill Airport

LCT 2: Urban – built-up areas.

- LCA 2a: Biggin Hill
- LCA 2b: Biggin Hill RAF Station

LCT 3: Settlement Fringe – areas of scattered or low-density residential development or land uses other than agriculture, including light industry and recreation such as pony paddocks and golf courses, on the fringes of urban areas amongst farmland, trees and woodland.

- LCA 3: Biggin Hill / Berry's Green Fringe

LCT 4: Settled Plateau – relatively low density development, interspersed with farmland, trees and copses, generally in a linear pattern following routes along ridges and plateau land between valleys.

- LCA 4a: Leaves Green
- LCA 4b: Downe and Berry's Green

LCT 5: Open Plateau – unsettled plateau farmland with occasional groups of farm buildings.

- LCA 5: Fickleshole Plateau

LCT 6: Wooded Valley – principally characterised by steep-sided, extensively wooded, dry valleys, but including clearings and fields with strong boundaries of hedges and trees.

- LCA 6a: Upper Ravensbourne Valley
- LCA 6b: Upper Cray Valley
- LCA 6c: Cudham Valley

LCT 7: Wooded Parkland – large-scale landscape interspersed with copses and a variety of sizes of woodland block and estate planting.

- LCA 7: Holwood Ridge

### LCT 1: Airfield

#### *LCA 1: Biggin Hill Airport*

This comprises the wide open expanse of grass of the airfield, crossed by runways and taxiways with associated signs and lighting. Buildings around the edges comprise large hangar buildings at West Camp, South Camp (Airport Industrial Estate) and East Camp in addition to terminal facilities



in the central part of the western side of the LCA. There are aircraft on hardstandings in front of the hangars and occasionally an aeroplane takes-off or lands, with some impact on tranquillity.

LCA 1 lies on a plateau of the dip slope, with a shallow fall from south to north from about 185m to 145m AOD. The plateau forms a gentle ridge between the upper reaches of the valleys of the River Ravensbourne (LCA 6a) and Cray (LCA 6b) to west and east respectively. Despite its open nature, LCA 1 is well enclosed by woodland along its eastern side (LCA 6b), the urban area of Biggin Hill (LCA 2a) including Biggin Hill Business Park to its south, and the combination of buildings and trees on the plateau to its west (LCAs 2b and 4a). The nature of the topography results in more open aspects to the north, with views of the wooded Holwood Ridge (LCA 7), to the north-west with far-reaching panoramic views of tall buildings in the City of London, and to the south-west where there are views out across the Upper Ravensbourne Valley (LCA 6a) to the Fickleshole Plateau (LCA 5) beyond.

### LCT 2: Urban

#### *LCA 2a: Biggin Hill*

LCA 2a comprises the settlement of Biggin Hill, including Biggin Hill Business Park on its northern edge adjacent to Airport Industrial Estate (LCA 1). The settlement occupies an area of complex landform, comprising the forked, far upper reaches of the Ravensbourne Valley, extending onto the plateau landform to its east. Much of the built-up area is therefore sheltered and enclosed by a combination of woodland and the valley landform. The northern tip of Biggin Hill lies at 120m AOD at the foot of the valley, whereas the highest part on the plateau to the south-east is at about 210m. The A233 passes through the settlement on the plateau, and on the line of the transition between plateau and valley to the north.

#### *LCA 2b: Biggin Hill RAF Station*

LCA 2b straddles the A233 to the north of Biggin Hill. This built-up area comprises principally the former RAF Station, with family accommodation west of the A233 redeveloped as private housing, and institutional buildings to the east of the A233, forming the majority of RAF Biggin Hill Conservation Area at West Camp, being mostly disused. It is contiguous with airport buildings on the western side of LCA 1. The gap between the two urban areas comprises the wooded eastern Ravensbourne valley side of LCA 6a to the west of the A233, whereas to the east there are open views across the airport through the perimeter fence.

### LCT 3: Settlement Fringe

#### *LCA 3: Biggin Hill / Berry's Green Fringe*

Located between Biggin Hill to its west and Berry's Green to its east, this fringe landscape comprises an area of scattered houses, farm buildings, low-key industrial uses, equestrian facilities, a school, an animal sanctuary and Cherry Lodge Golf Club. Amongst these features are productive agricultural fields and horse paddocks, with a pattern of tall hedgerows and copses, which give the area a well treed feel. Jail Lane links Biggin Hill and Berry's Green and the area is criss-crossed by a number of public footpaths.

Landform is gently undulating, falling slightly from south to north in line with the overall topography of the dip slope, with more pronounced undulations along its northern edge where it adjoins the valley landform of the far upper reaches of the Upper Cray Valley (LCA6b) and the south-eastern

edge of the airfield (LCA 1). The lowest point at the north is about 165m rising to about 215m AOD at the edge of the study area to the south.

#### LCT 4: Settled Plateau

##### *LCA 4a: Leaves Green*

LCA 4a abuts the north-western side of Biggin Hill Airport (LCA 1). It extends south from the southern fringe of Keston to encompass the ribbon development along the A233, through Leaves Green, to Biggin Hill RAF Station (LCA 2b). At its northern end it includes the ribbon development along Blackness Lane and Downe Road. This area is chiefly residential; houses are set in large plots with substantial mature boundary and garden trees and shrubs, giving the built-up area a leafy and enclosed feel. The built-up parts lie within a surrounding setting of wooded farmland.

There is a diversity of character within this ribbon; however, its unifying characteristic is the linear nature of the settlement pattern along the plateau land lying between the Ravensbourne and Cray Valleys (LCA 6a and 6b), which it shares with the airport. The landform of the plateau undulates to varying degrees within the overall fall of the dip slope towards the north, between about 165m at its southern end to about 110m at its northern end, where the north-south oriented landscape of NLA 22: Upper North Downs Dip Slope meets the more east-west oriented landscape of NLA 21: Lower North Downs Dip Slope.

##### *LCA 4b: Downe and Berry's Green*

LCA 4b occupies the gently undulating plateau land between Upper Cray Valley (LCA 6b) and Cudham Valley (LCA 6c) with a gradual south to north fall in line with the dip slope, from around 200m at Oak Farm to 125m where it meets the more east-west oriented landscapes of NLA 21. The linear nature of the settlement pattern is more dispersed than on the Leaves Green Settled Plateau. From south to north, it encompasses Berry's Green, Single Street, Luxted, Downe and Farthing Street. These settlements are strung out along a series of narrow lanes comprising (again, south to north) Berry's Green Road, Berry's Hill, Single Street, Luxted Road, Rookery Road and New Road Hill. The settlements lie within a landscape context of wooded farmland and the lanes are largely lined with dense hedges and trees. The level of tree and woodland cover within this and the adjoining LCAs greatly limits the extent of views.

#### LCT 5: Open Plateau

##### *LCA 5: Fickleshole Plateau*

To the west of Upper Ravensbourne Valley (LCA 6a) the land comprises open, relatively level plateau farmland. LCA 5 lies south and east of New Addington where, within the study area, the northward fall is approximately from 190m to 155m. Development comprises occasional, isolated groups of farm buildings. The nature of the topography allows some longer views across the plateau, for example from Skid Hill Lane.

#### LCT 6: Wooded Valley

##### *LCA 6a: Upper Ravensbourne Valley*

The valley forms a major feature, extending through the full length of the western part of the study area. Its key characteristic is the topography of the steep valley sides, but additionally within the valley itself the overriding valley formation combines with a locally undulating landform to create a landscape of distinctive quality. Towards its southern end, the land varies from around 200m to



130m AOD between the top and bottom of the valley, and towards its northern end from around 140m to 90m AOD.

Land use is chiefly agricultural and field sizes vary considerably across the LCA. There are woodland blocks and belts, often reflecting the linear north-south orientation of the valley. There is almost no built development across the entire valley landscape. The only roads are Jewels Hill, Saltbox Hill and Oaklands Lane, which cross the valley between Biggin Hill and New Addington. However, a number of public rights of way run through the valley. Views are contained by the valley sides and woodland, but extensive views along the valley are possible from some locations.

#### *LCA 6b: Upper Cray Valley*

LCA 6b comprises the heavily wooded upper extent of the Cray Valley, bordering the eastern side of the airport. In the southern part, the valley forks into a series of smaller valleys, resulting in a strongly undulating topography. The highest point at the southern end is approximately 185m AOD. The LCA narrows into a single valley at its northern end, where the ground level varies from about 145m to 120m AOD between top and bottom. West Kent Golf Course forms a substantial part of the LCA, its fairways appearing to be carved out of the woodland, oriented in line with the valley landforms. Also within the woodland is the Downe Scout Activity Centre.

#### *LCA 6c: Cudham Valley*

LCA 6c comprises a steep-sided valley, approximately 0.6km, wide lying partly within the eastern side of the study area. It includes the area identified in the description of NLA 22: Upper North Downs Dip Slope as a key natural landscape feature – Downe Bank and Cudham Valley North. The valley forms a strong linear feature through the landscape, emphasised by the wooded valley sides and the linear pattern of fields and paddocks in the valley bottom. As with LCA 6a and 6b, there is very little built development within the valley, the exceptions being along Berry's Hill and Downe Road, in addition to occasional other farm buildings and stables.

### LCT 7: Wooded Parkland

#### *LCA 7: Holwood Ridge*

The distinctive, wooded landform of LCA 7 encompasses the small part of the study area lying within NLA 19: South London Pebbly Sands, comprising the wooded knoll on which is situated the Grade I listed Holwood Mansion and its Grade II listed park and garden, along with parts of Caesar's Camp Scheduled Monument and Keston Common. The landform rises to a high point of 165m AOD just south of the mansion. The eastern part, north of Shire Lane and Downe Road has a more parkland feel where the woodland thins to a combination of woodland blocks and mature trees standing in open grassland, and the landform is complicated by the change from the generally north-south oriented landscape pattern of valleys and ridges, to a generally east-west orientation where the various tributaries of the upper reaches of the Cray Valley converge. The London Loop path passes through the LCA.

## **5.2 Site Visit**

This section comprises a description of the airport in the context of the foregoing wider character assessment, including photographs.

### Views out

As described in Section 5.1 – LCA 1 Biggin Hill Airport, the airport is well enclosed by woodland along its east, a combination of buildings and trees to its west, and the urban area of Biggin Hill to its south. The nature of the topography results in more open aspects to the north, with views of the wooded Holwood Ridge, to the north-west with far-reaching panoramic views of tall buildings in the City of London, and to the south-west where there are views out across the Upper Ravensbourne Valley.

**Photograph 1:** looking north out of the airport from a location near the northern end of the runway (Delta Taxiway) showing the wooded Holwood Ridge and to its left distant views to the centre of London.



**Photograph 2:** looking west out of the airport from a location at the western edge of South Camp (Juliet Taxiway) showing the view across Upper Ravensbourne Valley towards Fickleshole.



### Airport buildings and land

In this section, the various character areas of the airport are described by reference to photographs taken from within the SOLDC boundary. The areas are as follows:

- East Camp;
- Former tip site;
- Terminal area;
- West Camp;
- South Camp; and
- Land east of South Camp.

#### East Camp

**Photograph 3:** looking north-east towards buildings at East Camp from Lima Taxiway. East Camp comprises principally a cluster of assorted hangars with hardstanding for aircraft circulation and car

parking, located to the north-west of Cudham Lodge Woods. At the southern end of the woodland is a further hangar and car park. East Camp is generally isolated from other built-up areas.



#### Former tip site

**Photograph 4:** looking south-east across the former tip site towards the adjoining wooded landscape east of the airport and East Camp (far right). This is an extensive area of open land, formerly a tip, which was until recently covered with well-established, dense scrub.



#### Terminal area

**Photograph 5:** looking south-west from the southern end of Delta Taxiway towards the terminal hangar, facilities buildings and control tower. The main airport car park lies behind the buildings. Further north (outside frame to the right) is a separate group of buildings including the airport fire station.



#### West Camp

**Photograph 6:** looking south-west from the expansive apron in front of the terminal hangar, towards the group of Biggin Hill RAF Station buildings within the Conservation Area. This



comprises the area adjacent to and to the east of the A233. To the south (behind the building in the centre of the frame) two large hangars are also part of West Camp (see Photograph 9).



### South Camp

**Photograph 7:** looking south from Lima Taxiway towards the line of hangars that make up South Camp. There are car parking areas behind the buildings and extensive aprons and taxiways in front. RizonJet occupies the large hangar to the right. In terms of landscape character, South Camp could be perceived as part of Biggin Hill Business Park, thereby comprising the northern edge of Biggin Hill.



### Land east of South Camp

**Photograph 8:** looking north-east across the south-eastern corner of the SOLDC land from Churchill Way at a location to the east of South Camp. This area wraps around the eastern end of South Camp to link with the southern end of East Camp. It comprises grassland, well enclosed by mature trees and hedgerows to the south and woodland to the east.



### Views in from A233

The foregoing descriptions of landscape character and views indicate the enclosed nature of the airport. The result is that there are few open views into it from public vantage points. The main exception is the stretch of the A233 adjacent to the south-western SOLDC boundary between South Camp and the terminal area.

**Photograph 9:** looking north from the A233 towards the southern end of South Camp.



**Photograph 10:** looking east from the A233 towards the terminal hangar, adjacent to the northern end of RAF Biggin Hill Conservation Area at West Camp.



## 6.4 Zones of Visual Influence

The visual influence of the existing airport buildings has been compared with the likely additional visual influence of proposed development by reference to zone of theoretical visibility (ZTV) modelling in GIS. A number of scenarios have been considered, which are illustrated on plans in the following figures (contained in the Appendix), and briefly discussed:

- Figure 11 – ZTV East Camp: Existing Buildings;
- Figure 12 – ZTV East Camp: Existing and Proposed Buildings;
- Figure 13 – ZTV South Camp and Biggin Hill Business Park: Existing Buildings;
- Figure 14 – ZTV South Camp and Biggin Hill Business Park: Existing and Proposed Buildings;
- Figure 15 – ZTV West Camp and Terminal Area: Existing Buildings;
- Figure 16 – ZTV West Camp and Terminal Area: Existing and Proposed Buildings;
- Figure 17 – ZTV Composite: Existing Buildings; and
- Figure 18 – ZTV Composite: Existing and Proposed Buildings.

It should be noted that the purpose of a ZTV is to give an indication of where any part of a building (i.e. potentially just be the highest tip e.g. 1cm) could theoretically be visible from. The ZTVs used in this report take account of screening by landform, buildings and woodland. However, it is not possible to include individual trees, hedges and other intervening features into the GIS model, so they therefore represents a worst case approximation for the purpose of enabling comparisons to be made.

The existing East Camp buildings are chiefly visible only from within the airport, with some partial visibility possible from the south-east and isolated elevated areas to the north and west. It is clear that the proposed buildings within the Concept Plan could potentially be much more extensively visible.

The existing South Camp buildings are visible from most of the airport itself and are also likely to be partially visible from wider areas to the west, south-west and south-east, in addition to limited, distant, elevated locations to the north. Although the proposed buildings extend the ZTV to some extent, this is generally within those same areas and, within the limits of accuracy of the modelling, are unlikely to result in appreciably greater levels of visual impact.

The existing West Camp and terminal area buildings are visible from most of the airport itself and the area immediately to the west. They are also likely to be partially visible from wider areas to the north, south-west and south-east. Although the proposed buildings extend the ZTV to some extent, this is generally within those same areas and, within the limits of accuracy of the modelling, are unlikely to result in appreciably greater levels of visual impact.

Seen as a whole, all new proposed buildings extend the ZTV to some extent, particularly towards the north and south-east, however, this must be understood within the limits of accuracy of the modelling, in some areas they are unlikely to result in appreciably greater levels of visual impact. The main area where the composite ZTVs suggest that proposed buildings would be appreciably more visible, is in the area to the north-east of the airport, which is due largely to the proposed East Camp buildings outlined in the concept plan.



# 6 TARGETTED GREEN BELT REVIEW

## 6.1 National Planning Policy Framework policy for Green Belt

Paragraph 79 states that *“the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”*

Paragraph 80 lists the five purposes of Green Belt:

- *to check the unrestricted sprawl of large built-up areas;*
- *to prevent neighbouring towns merging into one another;*
- *to assist in safeguarding the countryside from encroachment;*
- *to preserve the setting and special character of historic towns; and*
- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

The Framework makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.

### NPPF on exceptional circumstances for new or altered Green Belt boundaries

Local Planning Authorities with significant Green Belts and development needs (that cannot be met on non-Green Belt land) are required to follow the NPPF policy wherever alterations to Green Belt boundaries are being considered. Paragraphs 82-85 of the NPPF are of most relevance for this targeted review. Whilst paragraph 82 is policy for the creation of new Green Belts, the clauses that must be satisfied are similar principles utilised in law when assessing whether exceptional circumstances to diminish existing Green Belts (see 6.2 overleaf) exist.

*82 The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. If proposing a new Green Belt, local planning authorities should:*

- *demonstrate why normal planning and development management policies would not be adequate;*
- *set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;*
- *show what the consequences of the proposal would be for sustainable development;*
- *demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and*
- *show how the Green Belt would meet the other objectives of the Framework.*

There is currently no new Green Belt land being proposed for designation in the emerging Bromley Local Plan. This study only considers the case for removal of Green Belt at the Biggin Hill SOLDC. In consultation with Members the question was raised as to whether or not Green Belt land that may be removed could be re-provided elsewhere in the borough. It was not considered that re-provision would constitute exceptional circumstances and in any case it would not be possible due to the fact that most of the borough is already covered by Green Belt and thus opportunities for creating new Green Belt would only be possible on areas of land that would not fulfil the five purposes of Green Belt or were not open in character. In addition, the Biggin Hill SOLDC is an economic designation and as such a targeted review of the Green Belt in this location is

appropriate given that there are no other reasonable alternatives for aviation focussed commercial development elsewhere within the borough. The need for development at Biggin Hill SOLDC has been discussed extensively in our previous report – Planning for Growth (2014).

NPPF Paragraphs 83-84 provide the principle policy steers stating that exceptional circumstances must exist for boundaries to be altered through the preparation of a Local Plan. With any such alterations taking account of the need to promote sustainable development.

*83 Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.*

*84 When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.*

### NPPF on permanence and boundaries once assessed against GB purposes

Paragraph 85 emphasises that when defining Green Belt boundaries, land that is not open should not be included, alterations should align with the spatial strategy, meet requirements for sustainable development and utilise defensible boundaries. It also covers how plan makers should utilise safeguarded land.

*85. When defining boundaries, Local Planning authorities should:*

- *Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
- *Not include land which it is unnecessary to keep permanently open;*
- *Where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- *Make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;*
- *Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
- *Define boundaries clearly, using physical features that area readily recognisable and likely to be permanent.*

## **6.2 Green Belt Case law**

As highlighted by the Locate Partnership, having to satisfy the 'very special circumstances' test in the development management situation is extremely difficult. Principally due to the fact that Green Belts are characterised by their permanence and the NPPF is clear that deletions are best dealt with via the plan making process. The NPPF stipulates development that would not be inappropriate in a closed list set out in paragraph 89. Under both the former PPG2 and NPPF

policy framework, this has led to a number of significant challenges in respect of the “very special circumstances” and “other harm” tests - see:

- R (Hunston Properties Ltd) v SSCLG and St Albans City and District Council [2013] EWHC 2678 (5 September 2013) [2013] EWCA Civ 1610 (12 December 2013)
- R (Holder) v Gedling BC [2014] EWCA Civ 599 (8 May 2014)
- Europa Oil and Gas Ltd v SSCLG [2014] EWCA Civ 825, 19 June 2014
- Redhill Aerodrome Ltd v Secretary of State for Communities and Local Government [2014] EWCA Civ 1386 (24 October 2014)

In their representations, the Locate Partnership cited the very special circumstances test and risk of call in by the Mayor of London as a key planning risk that has prohibited investment in the past. As set out above, the NPPF stipulates that exceptional circumstances must exist to alter Green Belt boundaries through a Local Plan. However, there is little explanation of what constitutes exceptional circumstances in the NPPF or PPG; as such we have to look to case law to provide more details.

There are a number of important plan making cases that address what constitutes ‘exceptional circumstances’ when proposing to alter Green Belt boundaries through the preparation of Local Plans.

In *Gallagher Estates Ltd v Solihull Borough Council* [2014] EWHC 1283 (Admin), *Hickinbottom J*<sup>31</sup> (“Gallagher”), Gallagher’s sites in the Tidbury Green area of Solihull were placed into the Green Belt by the Solihull Local Plan (“SLP”), adopted on the 3 December 2013. Gallagher challenged the SLP on three grounds, namely that (i) it was not supported by an objectively assessed figure for housing need, within the meaning of the National Planning Policy Framework (“NPPF”), (ii) the Council had failed in its duty to cooperate, and (iii) the Council adopted a plan without regard to the proper test for revising Green Belt boundaries. The observations and judgment surrounding ground 3 are of relevance to Local Planning Authorities preparing Local Plans and considering the alteration of Green Belt boundaries.

The High Court (Mr Justice Hickinbottom) observed the following common ground principles (with our emphasis added):

*124. There is a considerable amount of case law on the meaning of "exceptional circumstances" in this context. I was particularly referred to Carpets of Worth Limited v Wyre Forest District Council (1991) 62 P & CR 334 ("Carpets of Worth"), Laing Homes Limited v Avon County Council (1993) 67 P & CR 34 ("Laing Homes"), COPAS v Royal Borough of Windsor and Maidenhead [2001] EWCA Civ 180; [2002] P & CR 16 ("COPAS"), and R (Hague) v Warwick District Council [2008] EWHC 3252 (Admin) ("Hague").*

*125. From these authorities, a number of propositions are clear and uncontroversial.*

*i) Planning guidance is a material consideration for planning plan-making and decision-taking. However, it does not have statutory force: the only statutory obligation is to have regard to relevant policies*<sup>32</sup>.

<sup>31</sup> <http://www.bailii.org/ew/cases/EWCA/Civ/2014/1610.html>

<sup>32</sup> See: R (Hunston Properties Ltd) v SSCLG and St Albans City and District Council [2013] EWHC 2678 (5 September 2013) [2013] EWCA Civ 1610 (12 December 2013);  
Tesco Stores Ltd v Dundee City Council [2012] UKSC 13; and  
Lark Energy Ltd v SSCLG [2014] EWHC 2006 (Admin), [70]

ii) The test for redefining a Green Belt boundary has not been changed by the NPPF (nor did Mr Dove suggest otherwise).

a) In Hunston, Sir David Keene said (at [6]) that the NPPF "seems to envisage some review in detail of Green Belt boundaries through the new Local Plan process, but states that 'the general extent of Green Belts across the country is already established'". That appears to be a reference to paragraphs 83 and 84 of the NPPF...Paragraph 84 provides:

"When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development?"

However, it is not arguable that the mere process of preparing a new local plan could itself be regarded as an exceptional circumstance justifying an alteration to a Green Belt boundary. National guidance has always dealt with revisions of the Green Belt in the context of reviews of local plans (e.g. paragraph 2.7 of PPG2: paragraph 83 above), and has always required "exceptional circumstances" to justify a revision. The NPPF makes no change to this.

b) For redefinition of a Green Belt, paragraph 2.7 of PPG2 required exceptional circumstances which "necessitated" a revision of the existing boundary. However, this is a single composite test; because, for these purposes, circumstances are not exceptional unless they do necessitate a revision of the boundary (COPAS at [23] per Simon Brown LJ). Therefore, although the words requiring necessity for a boundary revision have been omitted from paragraph 83 of the NPPF, the test remains the same. Mr Dove expressly accepted that interpretation. He was right to do so.

iii) Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt. That is the ratio of *Carpets of Worth*.

iv) Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration.

130. Mr Lockhart-Mummery particularly relied on COPAS, in which Simon Brown LJ, after confirming (at [20]) that, "Certainly the test is a very stringent one", said this (at [40]):

"I would hold that the requisite necessity in a PPG 2 paragraph 2.7 case like the present – where the revision proposed is to increase the Green Belt – cannot be adjudged to arise unless some fundamental assumption which caused the land initially to be excluded from the Green Belt is thereafter clearly and permanently falsified by a later event. Only then could the continuing exclusion of the land from the Green Belt properly be described as 'an incongruous anomaly'".

In other words, something must have occurred subsequent to the definition of the Green Belt boundary that justifies a change. The fact that, after the definition of the Green Belt boundary, the local authority or an inspector may form a different view on where the boundary should lie, however cogent that view on planning grounds, that cannot of itself

*constitute an exceptional circumstance which necessitates and therefore justifies a change and so the inclusion of the land in the Green Belt.*

In the Solihull case the judge highlighted the importance of first establishing exceptional circumstances exist before applying any planning judgements. The judge is critical of the Planning Inspector's approach in this instance:

*135. I am persuaded by Mr Lockhart-Mummery that the Inspector, unfortunately, did not adopt the correct approach to the proposed revision of the Green Belt boundary to include the Sites, which had previously been white, unallocated land. He performed an exercise of simply balancing the various current policy factors, and, using his planning judgement, concluding that it was unlikely that either of these two sites would, under current policies, likely to be found suitable for development. That, in his judgment, may now be so: but that falls very far short of the stringent test for exceptional circumstances that any revision of the Green Belt boundary must satisfy. There is nothing in this case that suggests that any of the assumptions upon which the Green Belt boundary was set has proved unfounded, nor has anything occurred since the Green Belt boundary was set that might justify the redefinition of the boundary.*"

The Claim by Gallagher Estates succeeded in the High Court, but Solihull appealed against that decision. Laws LJ, in his judgement, dismissed the Inspector's reasons for returning the Respondents' sites to the Green Belt, saying that:

*35. In the circumstances there is in my judgment nothing in the verbal differences between PPG2 and NPPF paragraph 83 which advances Ground 3. Mr Katkowski [representing Solihull] emphasised the terms of paragraph 84 of the NPPF... Mr Katkowski's submission is that the conclusion that these sites are in the circumstances not suitable for housing, shows – and the Inspector effectively found – that their exclusion from the Green Belt would not conduce to sustainable development, because housing in those locations would not constitute such development: so that on analysis the Inspector's recommendation that they should be returned to the Green Belt was based on a "Green Belt Reason".*

*36. This is an ingenious submission, but I do not accept it. The fact that a particular site within a council's area happens not to be suitable for housing development cannot be said without more to constitute an exceptional circumstance, justifying an alteration of the Green Belt by the allocation to it of the site in question. Whether development would be permitted on the sites concerned in this case, were they to remain outside the Green Belt, would depend upon the Council's assessment of the merits of any planning application put forward. Moreover it is to my mind significant that in essence the merits or demerits of the possible use of these sites for housing have not apparently changed since 2005 when the same Inspector took a view diametrically opposed to his conclusion at paragraph 137: in March 2005 he had clearly concluded that the sites did not need to go into the Green Belt (and in the Solihull UDP of 2006 they were earmarked for review for housing). Yet at paragraph 137 of his current Report the Inspector makes no reference to his earlier opinion. For good measure, the SLP itself (paragraph 11.6.6, which I have read) plainly does not return the sites to the Green Belt for a Green Belt Reason.*

The relevant parts of the Plan will be remitted to the Council for re-consideration.

In addition, to Gallagher, one other recent case discussed in detail around the exceptional circumstances test: *IM Properties Development Ltd v Lichfield DC* [2014] EWHC 2440 (Admin), Patterson J<sup>33</sup> (“IM Properties”)

In this case the claimant contended that Lichfield District Council had persistently misunderstood the approach to the revisions of the Green Belt. The case discussed in detail the previous Gallagher case and reaffirmed some key matters with regards to whether a ‘necessity’ for an alteration had been established, that releasing green belt was not a last resort and that it is a planning judgement as to whether exceptional circumstances exist:

*89 .. whether a necessity has been established as a result of the exceptional circumstances to bring about a boundary alteration.*

*91 From that review [Gallagher]it can be seen that there is no test that green belt land is to be released as a last resort. It is an exercise of planning judgment as to whether exceptional circumstances necessitating revision have been demonstrated.*

*96 What is clear from the principles distilled in the case of Gallagher is that for revisions to the green belt to be made exceptional circumstances have to be demonstrated. Whether they have been is a matter of planning judgment in a local plan exercise ultimately for the inspector. It is of note that in setting out the principles in Gallagher there is no reference to a falsification doctrine or that any release of green belt land has to be seen as a last resort.*

The IM Properties case highlighted that under the Planning Compulsory Purchase Act, plan making bodies (officers and Members) and Inspectors have an ongoing duty to the achievement of sustainable development. The judgment cites the fact that Lichfield defended its proposed alterations by stating the release was consistent with the proposed spatial strategy and also the results of the Sustainability Appraisal. The extracts below are also notable as they highlight that fulfilling the duty requires strategic consideration about how best to shape development whilst ensuring the needs of the 21<sup>st</sup> Century are met (including economic growth).

*92 The interested parties emphasise the importance of section 39 of the Planning and Compulsory Purchase Act 2004 which imposes a duty upon the defendant and the inspector when exercising their functions under part 2 of the Act in relation to local development documents. The section demonstrates that the achievement of sustainable development is an ongoing duty upon any body exercising its function under part 2 of the Act. Sustainable development is a concept which is an archetypal example of planning judgment.*

*93 The duty to contribute to sustainable development imports a concept which embraces strategic consideration about how best to shape development in a district to ensure that proper provision is made for the needs of the 21st century in terms of housing and economic growth and for mitigating the effects of climate change. Inevitably, travel patterns are important. Both the SEA and the sustainability appraisal are important components in forming a judgment to be made under Section 39(2) .*

*94 As a result it is submitted that the green belt designation is a servant of sustainable development.*

*97 The only statutory duty is that in Section 39 (2) (supra). In that regard the contents of paragraph 84 of the NPPF are relevant. That says, “84. When drawing up or reviewing*

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<sup>33</sup> [http://www.lichfielddc.gov.uk/download/downloads/id/5896/high\\_court\\_challenge\\_decision](http://www.lichfielddc.gov.uk/download/downloads/id/5896/high_court_challenge_decision)



*Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.”*

*98 That is clear advice to decision makers to take into account the consequences for sustainable development of any review of green belt boundaries. As part of that patterns of development and additional travel are clearly relevant.*

*99 Here, the release from the green belt is proposed in Lichfield which is seen by the defendant as consistent with the town focused spatial strategy. The further releases have been the subject of a revised sustainability appraisal by the defendant. That found that no more suitable alternatives existed for development.*

In the discussion and conclusions LJ Patterson discusses the process that was followed by Lichfield. The judgement highlights that the necessity test was explicitly demonstrated to Members via the green belt review process and that a planning judgement was made guided by their statutory duty to achieve sustainable development and that they had ‘grappled’ with the content of the NPPF:

*100 The principal main modifications endorsed by the defendant expressly referred to the green belt review and to the supplementary green belt review as informing the release of green belt sites. They contained advice as to the relevant tests that members needed to apply. Both documents were available to the decision making committees and were public documents. Ultimately, the matter was one of planning judgment where the members had to consider whether release of green belt land was necessary and, in so determining, had to be guided by their statutory duty to achieve sustainable development.*

*101 The members were aware that they had originally been presented with the Deans Slade and Cricket Lane sites as directions of growth at a much earlier stage of the local plan development. As the sites were to the south of Lichfield members were advised that development there would have little impact on the setting of the city overall and there were few limitations beyond the policy constraint of green belt. However, the extent of concern about loss of green belt at that time meant that the plan was revised to reduce the amount of growth in that direction. The inspector had found that the defendant had failed to produce a sound plan with that approach. An alternative strategy of a new village had been considered by the inspector as a first stage of the examination process and he had found that that failed to outperform the council's preferred strategy. The members were entitled to take all of those factors into account in concluding whether there was a necessity to propose to release sites from the green belt.*

*102 In my judgment, the members were aware of the test which they had to apply through the content of the documents before them together with their experience and knowledge as members of a council where a significant amount of its land was within the green belt. They were entitled to take into account the genesis of the plan and the inspector's findings in concluding that in their view there were exceptional circumstances for a green belt revision. The main modifications endorsed show, in my judgment, that the defendant grappled with matters set out in the NPPF, their duty under Section 39 and the request by the Inspector to remedy shortcomings in their Development Plan.*

*103 Further, the letter from Deloitte of the 6th January 2014 which was sent to members of the Environment and Development (Overview and Scrutiny) Committee, albeit on the part of the claimants, was absolutely clear as to the correct approach to adopt. It rightly said that exceptional circumstances had to be demonstrated. It is odd, in those circumstances, for the claimant to make the submission that the defendant throughout misunderstood, misinterpreted and/or was misled as to the relevant test to apply. This ground fails.*

These two key judgements confirm that exceptional circumstances must be established citing any circumstances that have changed, with officers and Members fully aware of the process required by law to alter Green Belt boundaries. The removal of Green Belt requires a planning judgment (including consideration of sustainable development), direct reference to the test, and close regard to the Gallagher and IM Properties observations.

### **6.3 The case for exceptional circumstances**

We can glean a number of important points from these recent judgements with regards to what constitutes exceptional circumstances and what the correct procedure should be in light of NPPF policies and case law:

- The mere process of preparing a new local plan is not itself an exceptional circumstance justifying an alteration to a Green Belt boundary
- Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt. The same stringent regime must be followed in either scenario because whichever way the boundary is altered there must be serious prejudice one way or the other to the parties involved
- The NPPF exceptional circumstances test is the same as the PPG2 test i.e. circumstances are not exceptional unless they necessitate a revision of the boundary i.e. have any of the assumptions upon which the Green Belt boundary was set previously been proven to be unfounded/anomalous or has anything occurred since the Green Belt boundary was set that might necessitate the redefinition of the boundary
- Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration e.g. if a site is unsuitable for housing that cannot be considered exceptional circumstances by itself for de-designation
- Whilst each case is fact-sensitive the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment
- The statutory duty contained in Section 39 of the PACP 2004 applies to officers, Members and Inspectors (a duty to the achievement of sustainable development). This means that the contents of paragraph 84 of the NPPF are relevant, therefore alterations should consider how best to shape development to meet the needs of the 21st Century
- Members must understand their statutory duty when making decisions and the exceptional circumstances test must be explicitly referred to. It should be clear that a planning judgement has been made in light of evidence and a robust process has been followed.
- Alterations should be consistent with the spatial strategy and be made with due consideration to relevant evidence, such as a sustainability appraisal and other technical evidence for sustainable development (e.g. transport, landscape etc.)
- The PPG is a material planning consideration for plan making. However, it does not have statutory force: the only statutory obligation is to have regard to relevant policies.

*Have any of the assumptions upon which the Green Belt boundary was set been proven to be unfounded?*

There are no factual inaccuracies or anomalies with how the Green Belt at Biggin Hill was designated in the 1950s. However, historical mapping and the planning history of the site shows that piecemeal development has occurred incrementally since the middle of the last Century. Therefore the function of the Airport and buildings present on site when the Green Belt was designated has changed dramatically over the past 50 years or so. Below is a summary of the evolution of London's Metropolitan Green Belt and a brief history of development at Biggin Hill Airport.

The London Society publication 'Green sprawl: Our current affection for a preservation myth?'<sup>34</sup> charts an extensive history of London's Green Belt:

*.. it's interesting to note that Queen Elizabeth I (1533-1603) established a three-mile wide cordon sanitaire around London in 1580. However, whilst this prohibited housing development on any sites where there hadn't been a building in living memory, it was also a proclamation that was widely ignored. Indeed, aside from a brief attempt by the Commonwealth Parliament in 1657, the idea of limiting London's growth received little attention until the late nineteenth century.*

*From this point things start to get interesting and the evolution of London's green belt is hereafter defined by three characteristic periods; emerging through civic debate at the turn of the twentieth century before being officially sanctioned in the wake of Patrick Abercrombie's Greater London Plan (1944) and significantly expanded upon in the Strategic Plan for the South East (1970) and subsequent Local Plan revisions.*

*Today the city is served by 516,000 hectares of green belt land; an area large enough to accommodate some 20-50 million houses. We have capacity on brownfield sites within the city limits and opportunities to densify existing areas but need to critically consider every option if we're to deliver over 1,000,000 new homes alongside jobs and associated infrastructure by 2030.*

*...As with others in the first half of the last century, from Howard to Abercrombie, the London Society failed to fully consider population growth. Instead it anticipated a static position with London's depopulation resulting in a gradual relocation of residents to new satellite towns in the South-East of England.*

The Green Belt (London and Home Counties) Act 1938 permitted local authorities around London to purchase land to be protected as open space and enter into covenants with landowners that open spaces would not be given over to development. The Town and Country Planning Act 1947 permitted local authorities to designate areas to be protected as part of the green belt within their development plans. In the 1950s the Ministry of Housing and Local Government set out the first official reasons for designating green belt in 1950s as (1) *to check the further growth of a large built-up area*, (2) *to prevent neighbouring towns from merging into one another*, and (3) *to preserve the special character of a town*. Duncan Sandys, Minister of Housing and Local Government, was proactively encouraging local authorities to consider protecting land around their towns by designating clearly defined green belts of 'some 7 to 10 miles deep'.<sup>35</sup>

<sup>34</sup> <http://www.londonociety.org.uk/wp-content/uploads/2014/12/Green-Sprawl-Our-Current-Affection-for-a-Preservation-Myth.pdf>

<sup>35</sup> Ibid

In 1955 Green Belt policy for England was set out in Ministry of Housing and Local Government Circular 42/55 which invited local planning authorities to consider the establishment of Green Belts in their area. By 1959 Metropolitan Green Belt was fully designated in local plans. In 1988 Circular 42/55 was replaced with Planning Policy Guidance Note 2 (which was subsequently updated in 1995 to add positive objectives for Green Belt land and then again in 2001) and then the NPPF replaced PPG2 in 2012.

It was during the period up to, during and for a decade after World War II that the extent of residential land in Bromley, which had spread down into the valleys, was effectively set with the introduction of tight Green Belt controls in the mid-1950s. This prevented merging with the developing London suburbs to the north. The extent of the Green Belt in Bromley has remained largely the same ever since, with Green Belt washing over the Airport and wider SOLDC area. It's interesting to note that shortly after designation the Airport is said to have been in the midst of its third phase of notable historical development.

RAF Biggin Hill is one of the most famous military airfields in Britain. Its fame is such that the name Biggin Hill has entirely eclipsed the former name of the adjacent village, once known as Aperfield. It opened on 14 February 1914, using eighty acres of high meadowland, formerly in the ownership of the Earl of Stanhope's Cudham Lodge Estate. The site was chosen because its elevation raised it above the mists that affected lower lying areas and interfered with flying. Use by the RAF for flying ceased in 1959, after which the runways were transferred to civil control. RAF use of the ground facilities ceased in 1992, leaving many of the buildings vacant. A conservation area was designated in June 1993, with the strong support of Historic England (then known as English Heritage) and a number of RAF veterans associations. It incorporates the best remaining examples of airfield architecture associated with the RAF presence.

Biggin Hill RAF Conservation Area Supplementary Planning Guidance (updated December 2001) describes three main phases of development:

*The airfield has had three significant phases of development. In the First World War (1914-18) it acted as a Radio Signals Unit (by which it is alleged that the world's first air to ground broadcast was made) and then as a "Home Defence Aerodrome", hosting Bristol fighters that defended London against German bombing raids. Few structures remain from this phase of operation.*

*The second phase commenced in 1929 when the station was considerably expanded. Many of the buildings presently on the site were originally constructed at that time in a restrained Neo-classical style... During the Second World War (1939-45), Biggin Hill played a key role as a fighter station in the defence of London during the Battle of Britain. Considerable bomb damage occurred to the buildings. Many of these were repaired and form part of the conservation area today, others were never replaced: their sites became the locations for post war development. Towards the end of the war, Biggin Hill served as a transport base for flights to newly liberated sectors of Europe. In 1943, a memorial chapel commemorating those who gave their lives was dedicated to St. George. Following a fire that destroyed the original St. George's chapel in 1946, a new chapel, designed by W. Wylton Todd ARIBA to replicate the atmosphere of the original hut, was erected on a bomb damaged site...*

*The third phase commenced in 1959, when civil use of the airfield commenced. The buildings in the Conservation Area became the RAF Ground Officers' Selection Centre. In 1962 the HQ of the RAF Aircrew Selection Centre moved to Biggin Hill, establishing it as a*

*major training centre. A large post-war building, the Officers & Aircrew Selection Centre (OASC) provided a first taste of RAF life to generations of recruits.*

Following intensification of the Cold War after the outbreak of the Korean War in 1950, with the resultant fear of a possible Soviet nuclear attack, a large scale rearmament programme was undertaken. This included the modernisation of several World War II airfields to enable the service of Meteor fighters. The main runway was extended in 1957 but in 1958 Biggin Hill ceased to be an operational RAF station, becoming the Officer and Aircrew Selection centre for the RAF.

As described in the SPG, the impending closure of the nearby original London Airport at Croydon meant that from 1956 much of the civilian light aviation from Croydon relocated to Biggin Hill and it became a joint civilian and military airport. Croydon closed completely in 1959, at which time Biggin Hill became a mainly civilian airport for a time with only occasional military flying taking place. Towards the end of 1963, the Orpington Urban District Council (within whose boundaries the airfield lay at that time) was approached by the Board of Trade as to whether the Council would purchase (effectively from the RAF) Biggin Hill airfield. In 1964, on formation of the London Borough of Bromley, which absorbed Orpington, the offer to purchase was open to the new borough. Protracted negotiations were held with the Board of Trade and later the Department of Trade and Industry. At a special meeting on 15 June 1972 the Council decided to purchase the airport by a recorded vote of 41 to 9. The purchase was eventually completed in 1974. The Council's declared purpose in purchasing the Airport was, amongst other things, to continue to protect the environment of the area to the greatest practicable extent compatible with the presence of a long-established airport.<sup>36</sup>

In May 1992 the Department of Transport issued a direction to LBB under s.13 of the Airports Act 1986. The effect of this direction, which affected airports generating turnover of £1million or more, was to require LBB to set up a new company for the purpose of operating the airport as an independent commercial undertaking. To comply with the direction would have required the transfer of all the assets and liabilities to the company with a consequential loss of LBB control over airport activities. In the circumstances, LBB decided that the granting of a 125-year lease would enable more control to be retained than an outright disposal of the freehold or by a transfer to a local authority company with an uncertain future. In May 1994, the airport was leased to Biggin Hill Airport Limited ("BHAL") for 125 years<sup>37</sup>.

The Lease requires BHAL to manage the Airport in accordance with certain obligations and controls on the operation and development of the Airport and business. The lease and operational obligations include:

- (i) compliance with the user clause – as an airport providing facilities for business aviation, flight training and private flying and other airport and aviation related uses;
- (ii) maintenance of the Airport in accordance with the principle of good estate management;
- (iii) ensuring the safe, efficient and economic operation of the Airport;
- (iv) restrictions on the hours of operation, both weekdays and weekends<sup>38</sup>;
- (v) restrictions on the number of aircraft movement to 125,000 per annum;
- (vi) allowing only aircraft that meet a defined set of noise criteria.

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<sup>36</sup> <http://bigginhill.co.uk/>

<sup>37</sup> <http://www.bigginhillairport.com/about/historyraf-chapel/>

<sup>38</sup> BHAL have applied to vary the restrictions on the hours of operation (see Section 3).

The Planning for Growth study examined the incremental development of the buildings and road layout at West Camp during the 20<sup>th</sup> century to show how this area had changed over a 33 year period (see Figure 19 overleaf) between 1930 - 1963.

In 1930, immediately prior to the expansion of Biggin Hill airfield, West Camp had a linear plan that closely follows Main Road. At the north of the site are residential and recreational areas, the middle of the site contains workshops and storage areas and to the south are the operational buildings and aircraft hangars. The current location of St. George's Memorial Chapel is occupied by a large aircraft hangar. The roads within West Camp at this time are of a minor nature reflecting the use of vehicles at the time and display a concise structure to the camp. The location of the actual airfield is clearly discernible and is close to the Main Road.

By 1954 site plans indicate that post WWII developments have led to a significant expansion of West Camp's building stock. The large hangars have moved to the east, indicating the new alignment of the taxiways and runways and moving this area of activity away from Main Road. The original building stock has been expanded with the addition of many smaller individual structures including many that currently remain. The increase in the number of serving military staff is indicated by the increase in barrack buildings in the north and the development of a large parade ground adjacent to St. George's Memorial Chapel as well as tennis courts for recreation. Despite the increasing density of structures the camp retains a high degree of permeability reflected in its road layout. The original camp structure and road layout is still clearly discernible. This maps acts as a proxy for what may have been the extent of buildings when the Green Belt designation was introduced.

West Camp's development as a training and selection centre was consolidated by the construction of the Officer and Aircrew Selection Centre, which is recorded on the 1963 site plan. Elsewhere there are few changes to the layout and density of buildings within the camp. Likewise there are few alterations to the road layout with the original layout of the early airfield is clearly discernible. Considered together the development of building layout at West Camp reinforces the understanding that whilst the structure of the camp was planned with identifiable areas within the camp satisfying differing functions the incremental changes and additions to the building inventory has encouraged a dispersed layout of the buildings.

Development at West Camp (and other areas of the airport) over the intervening decades since World War II has led to a gradual increase in the built up character. Piecemeal development, either under permitted development rights or via applications, has diminished the openness of the airport. However, the Green Belt has not been materially altered or comprehensively reviewed since the middle of the last Century. In 6.4 (Assessment against Green Belt Purposes) we have assessed the proposed land included within the SOLDC against the five purposes of Green Belt and openness, to understand how this historical development has affected the Green Belt at Biggin Hill and to assess whether it is still meeting the five purposes of Green Belt.



Figure 19 West Camp historical developments 1930-1963



*Has anything occurred since the Green Belt boundary was set that might necessitate the redefinition of the boundary?*

The mere process of preparing a new local plan is not itself an exceptional circumstance justifying alteration to the Green Belt, therefore it's important to highlight what circumstances may necessitate any alteration. Our previous study, Planning for Growth in Bromley (July 2014), highlighted a number of changes to national and regional policy that we contend have materially altered the planning landscape in respect of Biggin Hill in comparison to the approach at the time the Green Belt was first designated and at the time when work began on the extant Unitary Development Plan (2006). At the national level the biggest occurrence to necessitate redefinition of the Green Belt boundary since 2006 is the replacement of PPG2 with the NPPF in 2012. Publication of the NPPF removed national policy support Major Development Sites (MDS) in the Green Belt, leaving the existing UDP policy misaligned with the NPPF. The removal of the MDS from national policy means that development proposals at the airport are now subject to much greater uncertainty. We content that this is one such exceptional circumstance that necessitates a review of the approach to Green Belt at Biggin Hill.

At the regional level, the designation of Biggin Hill as a SOLDC in the 2011 London Plan is another significant occurrence necessitating a review of the Biggin Hill Green Belt. The SOLDC designation had its genesis in the work of the Outer London Commission (OLC). The OLC was established by the Mayor of London to advise how Outer London can play its full part in the city's economic success. The OLC reported that there was scope for smaller increments to existing capacity (and improvements to quality) in some competitive locations with distinct types or scales of activity (or mix of activities). The OLC recommended that to avoid compromising the viability of capacity in other centres, these would have to be of more than sub-regional importance and with the potential for further development both within the centres themselves and in their hinterlands.

The Biggin Hill SOLDC remains in the Further Alterations to the London Plan (March 2015). Following publication of the 2011 London Plan and prior to adoption of the most recent plan in 2015, the Greater London Authority included a series of SOLDC Implementation Principles in the Town Centres SPG<sup>39</sup> (July 2014). Boroughs and their partners are encouraged to:

<sup>39</sup> [https://www.london.gov.uk/sites/default/files/Town%20Centres%20SPG\\_0.pdf](https://www.london.gov.uk/sites/default/files/Town%20Centres%20SPG_0.pdf)

- a. realise the potential for further development of the Strategic Outer London Development Centres concept whilst ensuring that it supports and complements the economic prospects of neighbouring town centres including those in adjacent boroughs*
- b. encourage local innovation to identify and enhance distinct economic strengths which are at the heart of the concept*
- c. support local initiatives to take forward the SOLDC concept in light of local circumstances including planning policy and frameworks, strategic infrastructure plans, new development and refurbishment, transport accessibility and capacity upgrades, management and investment (including Business Improvement Districts), improvements to the business environment, branding, promotion, events and marketing*
- d. develop complementary linkages with other types of business locations, for example town centres, office locations and development corridors extending beyond London*
- e. realise the potential of each of the London Plan SOLDCs having regard to the guidelines in Appendix E.*

The site-specific Biggin Hill SOLDC guidelines contained in Appendix E of the SPG are also of relevance to the exceptional circumstances case:

- *[Perform a] 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; and*
- *Support partnership working with education and training providers related to aviation and high-tech industry.*

The SOLDC designation resulted from work commissioned by the Mayor to investigate how best to utilise areas such as Biggin Hill that are of wider than sub-regional importance. The work of the OLC and subsequent changes to the London Plan is a clear change in circumstance; it has ushered in a greater focus on growth at Biggin Hill in light of the London Plan SOLDC designation and contributes to the exceptional circumstances case. This is clear and unambiguous regional policy and guidance stating that LBB should review the Green Belt and other designations insofar as they act as a constraint to future growth envisaged for the SOLDC and the wider economic vision of the Mayor of London.

In addition, the Context Update (Section 4) summarises a series of national developments since publication of our initial report that further demonstrate exceptional circumstances necessitating a review. These developments, alongside changes to national and regional policy, taken together represent a strong case for exceptional circumstances:

- The **Biggin Hill Airport proposal to vary operating hours** part of the Airport's plan to focus on business aviation and encourage more business aircraft owners to base themselves at Biggin Hill, providing trade to new and existing businesses at Biggin Hill leading to a significant increase in employment – in accordance with the SOLDC objectives. The Airport believe the more flexible operating hours will help them to achieve the growth

potential and to be competitive as a business and general aviation airport. The current operating hours were set 20 years ago and according to the Airport were no longer fit for purpose and inhibiting the airport's potential to grow and attract inward investment. However, to achieve the 2,300 jobs envisaged in the Locate Partnership's Economic Growth Plan, the Airport will also require a more positive planning policy framework alongside more flexible operating hours.

- The **House of Commons Transport Committee - Smaller airports** recognised that smaller airports are crucial to the maintenance and growth of regional economies. The report noted that smaller airports have suffered disproportionately compared with larger airports. This is because they are relatively fragile commercial entities given that aviation businesses are highly mobile and can swiftly adjust or relocate their services in line with demand. Airports like Biggin Hill have diversified the range of aviation-related activities conducted from and at their sites to maximise resilience and commercial viability. Ultimately airports cannot survive if aircraft operators do not want to use it. These findings back up the case made by Biggin Hill Airport operators in their Economic Growth Plan where calls for a more permissive policy framework were requested to maximise commercial opportunities and de-risk Biggin Hill as a potential place for investment.
- The **General Aviation Strategy** highlights the specific difficulties that aerodromes face where Green Belt washes over sites. The vision, aims and commitments from Government are geared toward ensuring the UK is the best place in the world for GA as a flourishing, wealth generating and job producing sector of the economy. The Government are bullish about the growth prospects of the sector in the strategy. This cannot be ignored and is a clear signal to the market and Local Planning Authorities to consider their local strategies in addressing local issues.
- The recent revisions to the **Planning Practice Guidance** state Councils should work with airport stakeholders (at the plan making stage) to allow aviation to continue making a significant contribution to economic growth, as per the guidance in the Aviation Policy Framework. In addition, airports can be put forward for mixed use development that includes continuing, adapting or restoring aviation services in addition to other uses. The PPG is a material planning consideration for plan making and the new guidance issued in March 2015 is in itself part of the justification for exceptional circumstances given that it encourages greater diversification of uses and growth. As well as propounding mixed uses and echoing the thrust of the General Aviation Strategy, it reminds the plan maker to consider the content of the Aviation Policy Framework.
- The **Aviation Policy Framework** (AVF) requires Local Plans to have regard to policies in the AVF. The AVF recognises the importance of developing local strategies for airports to maximise the catalytic effects of airports to attract business and support growth. The AVF calls on local authorities, to utilise the range of tools at their disposal to help support businesses in the vicinity of airports. It also emphasises the need to maintain a viable network of business aviation
- The Communities and Local Government Select Committee encourage all councils (in **The Operation of the National Planning Policy Framework** report) to: *“review the size and boundaries of their green belts. They should then make any necessary adjustments in their local plan. The rigorous requirements of public consultation, examination by an inspector and adoption by the council will ensure that any changes have been subject to thorough consideration.”*

### Are proposed alterations to the Green Belt consistent with the areas spatial strategy for sustainable development?

This report and its recommendations shall be used by officers and Members to inform LBB's plan making. Paragraph 85 of the NPPF states that *"when defining boundaries, local planning authorities should ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development"*.

The current London Plan and emerging Local Plan policy support development at the Biggin Hill SOLDC with explicit support in the vision and objectives for business, employment and the local economy<sup>40</sup>. The objectives in the emerging plan align well with the London Plan and Town Centre SPG (as well as the Airport's own concept plan):

- *Business Areas adapt successfully to the changing needs of modern industry and commerce.*
- *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 and environmental constraints.*

The Spatial Strategy is a central element of the Local Plan and key to how the Vision and Objectives for the Borough will be delivered. It identifies locations for strategic development and sets out in broad terms the location for growth, areas with significant opportunities for change and enhancement, as well as areas where protection and more constrained development is anticipated. The Biggin Hill SOLDC is recognised as one of the key focuses for the Spatial Strategy as a Strategic Economic Growth area. The Local Plan sets out the Borough's vision for sustainable development, informed by technical evidence, representations from stakeholders and the parallel Sustainability Appraisal process.

The London Plan (part of the Development Plan for Bromley) supports development of Biggin Hill SOLDC. Policy 2.16 Strategic outer London development centres (and subsequent Town Centres SPG guidance), set out a number of policies that would lend support for exploring future development potential at the SOLDC:

- Policy 2.6 Outer London: vision and strategy
- Policy 2.7 Outer London: economy
- Policy 2.8 Outer London: Transport
- Policy 6.6 Aviation

### Local planning authorities should take account of the need to promote sustainable patterns of development, including how best to shape development to meet the needs of the 21st Century

The lack of any objective review since the 1950s means that today London's Green Belt is in some instances failing to meet the scale and needs of the 21<sup>st</sup> Century. Much of it still provides significant ecological, environmental, visual and amenity function, but there are areas that should

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<sup>40</sup> Local Plan Draft Allocations, Further Policies and Designations Document Consultation (September 2015)

be subject to review and may assist in achieving sustainable growth where land no longer supports the purposes of Green Belt or no longer remains open. In some cases, protecting Green belt land close to London which is of less ecological, recreational and amenity or visual value is putting other, more environmentally valuable non-Green Belt land at risk. Biggin Hill is one such place where a review is appropriate given the modern requirements of a business aviation Airport over the plan period to 2030. Changes outlined in the Context Update (Section 3) and this Section point to a situation where a 21<sup>st</sup> Century Airport is attempting to operate within the policy framework of a 1950s Green Belt that has not been objectively reviewed since the last UDP or since BHAL took over control in the 1990s.

Paragraph 83 of the NPPF requires that, once established, Green Belt boundaries should only be altered in exceptional circumstances and then only as part of a review of a local plan as it is a strategic decision on where development should be located. For a General Aviation and business Airport to be successful a clear and unambiguous planning policy framework is required.

Circumstances that would justify rethinking the boundaries and extent of the Green Belt could be justified if the conditions that resulted in the creation of the Green Belt in the first place have changed. For example, it is now necessary for the commercial area of Biggin Hill to physically grow in order to meet demand and meet the objectives of the National, Regional and emerging Local Policy for Airports and SOLDCs.

All reasonable efforts have been made to maximise the amount of development within the Airport under the current policy framework, but as highlighted by the Locate Partnership it is now increasingly difficult to attract investment due to the current planning risks. Opportunities for optimising development and ensuring land at the SOLDC has been appropriately used has already been explored. It is not possible to review other employment areas elsewhere in the Borough as they are not attached to the Airport. The previous report explored the potential for non-Airport related permitted development, this exercise found there to be little scope for expansion in non-airside areas of the SOLDC.

Capacity of the area has been maximised and there are seemingly no other deliverable options, as such LBB tasked AECOM to examine the case for exceptional circumstances and to review the development capacity of the SOLDC to inform plan making in 2014.

It was highlighted in consultation with the Locate Partnership that Green Belt designations at the Airport are prohibiting development efforts leading to lost opportunities and failure to meet business and commercial needs and demands. The recent Transport Select Committee report *Smaller Airports* and Biggin Hill Airport's submission to the committee highlighted the vulnerable nature of smaller airports viability. Production of a new Local Plan offers an opportunity to look at these issues in greater detail and assess how best to support the SOLDC designation.

The Locate Partnership has put forward their own reasons as to why exceptional circumstances exist to alter the Green Belt boundaries at Biggin Hill. The *Economic Growth Plan Update* (July 2014) prepared by Nathaniel Lichfield & Partners on behalf of London Biggin Hill Airport (LBHA), includes a number of is the most up to spatial planning and development expression of the LBHA business strategy.

Section 2 of the Locate report sets out the drivers of growth at Biggin Hill, Section 3 outlines the estimated growth levels at Biggin Hill covering the partnership's growth proposition, LBHA'S assumptions for the growth rate of businesses, sources of inward investment that will drive exogenous job growth, and the potential scale of job growth associated with inward investment at

Biggin Hill. Section 4 (Delivering Growth at Biggin Hill) includes LBHA's Concept Plan and indicative phasing. The report states that:

*The Airport does not have a formal masterplan for the delivery of its investment plan, although it is actively working up its ideas for initial phases. However, in order to give a spatial expression of the growth potential of Biggin Hill and how it currently envisages this being delivered, it has updated the initial Concept Plan that NLP prepared in January 2013. That initial Concept Plan had been a theoretical 'capacity-led' plan, aimed at testing the physical job capacity of the SOLDC.*

The Airport considers that there is a compelling exceptional circumstances case to alter the Green Belt boundaries at Biggin Hill. These reasons are summarised below:

1. *There is a pressing business need for development at Biggin Hill to take advantage of Biggin Hill's role in meeting London's business aviation needs, realise the full potential of the SOLDC and contribute to the Borough's economic growth objectives*
2. *This business need cannot be met at Biggin Hill with the current planning policy designations in place.*
3. *The business need cannot be met at any alternative non-Green Belt location within Bromley or at any of London's established airports.*
4. *There are a number of economic benefits to Bromley and the wider London economy which will accrue from allowing land to be released from the Green Belt.*

Table 6 Locate Partnership's case for exceptional circumstances

Case for exceptional circumstances
<p><b><i>Is there a clear development need?</i></b></p> <p><i>The Airport is identified as an SOLDC where growth is to be encouraged. In market terms there is an opportunity for Biggin Hill Airport to benefit from wider changes in the airport policy of the UK, capture a growing share of a vibrant business aviation sector that wants to make London its home, and in doing so, secure significant economic and job creation benefits. The important role of business aviation to London's global economic role has been set out previously and remains. Although precise 'job growth' estimates are difficult, there is every reason to believe that Biggin Hill can deliver on the scale of development shown in the illustrative Concept Plan set out earlier in this document.</i></p> <p><b><i>Is there a non-Green Belt alternative to meeting the development needs identified?</i></b></p> <p><i>Airport operators and other aviation-related businesses must be based at an Airport in order to base and maintain their airport which operator from the Airport. These operators can only be based on an Airport as they require access to a tarmac runway, hangarage to maintain and store aircraft and other specialist facilities, and hence cannot be based at a non-airport location. There are no alternative locations within Bromley which have airside access and access to a tarmac runway. Hence the development needs identified in Section 3.0 can only be met at Biggin Hill Airport within the borough of Bromley.</i></p> <p><i>If operators (requiring airside access and access to a tarmac runway) cannot locate at Biggin Hill, then they have to locate at an alternative airport location which has both available non-Green Belt land to accommodate development and sufficient capacity in terms of number of aircraft movements.</i></p> <p><i>In or just outside London the civilian airports which (alongside Biggin Hill) currently handle business/general aviation are Stansted, Luton, London City and Farnborough. Luton has very limited space for development on the ground. In the air there is very limited capacity which is increasingly occupied by scheduled air services and low cost airlines. It is estimated that slots at Luton will soon become more difficult and the Airport has elected to apply a system of 'slot</i></p>



*matching' to manage the volume of take-offs and landings. The 'slot matching' is considered to be the threshold at which business aviation users will no longer wish to use the airport as they are unable to guarantee that they can land/take-off at their convenience. The situation at Stansted is similar.*

*There is no land available at London City to accommodate new development and capacity is constrained. The situation in London and across the South East has been recognised in The Airport Commissions Interim Report (December 2013) and latterly has been enforced by new regulations from the CAA designed to improve the resilience of the passenger services at large airports by requiring non-scheduled flights to have a slot before having approval of their flight.*

*Farnborough is operated by TAG who carry out the functions of operators but effectively as a 'one stop shop' i.e. all the work is controlled and undertaken by TAG as opposed to individual operators. Hence there is no scope for operators and manufacturers to have a dedicated base at Farnborough. In this regard, London Biggin Hill is complementary in its offer to Farnborough.*

*It is clear from the above that there are no alternative non-Green Belt locations in Bromley that can accommodate the business/development needs identified in section 3.0. There are no alternative non-Green Belt locations at other airports in or just outside London which could also meet these requirements.*

***There are significant economic, social and other benefits***

*The economic benefits of meeting business needs at Biggin Hill are significant and draw on the original identification of Biggin Hill as an SOLDC. In simple terms, there is job growth potential of at least 2,300 jobs (linked to 48,198 m2 of new build floor space and 43,534 m2 of refurbished/relocated floorspace) previously estimated, and this in turn will generate significant potential growth in economic output, wider spending in the economy, and local business rates for LBB. Previous reports have set this out and it is not repeated here.*

*There is a compelling business need to promote and expand the business aviation cluster within the SOLDC at Biggin Hill. In simple terms, the absence of realistic alternatives inside London mean there is little prospect of a more sustainable location being identified to meet the business aviation needs, and alternatives outside the Green Belt would result in longer distance journeys to and from central London, which is the key locus. In simple terms, the absence of realistic alternatives inside London mean there is little prospect of a more sustainable location being identified to meet the business aviation needs, and alternatives outside the Green Belt would result in longer distance journeys to and from central London, which is the key locus.*

The change in circumstances highlighted in Section 3 and 6.3 along with the Locate Partnership's arguments for exceptional circumstances (Table 4) demonstrate exceptional circumstances exist in this case. Therefore it is appropriate to conduct a targeted review of the Green Belt within the Biggin Hill SOLDC as part of the preparation of LBB's new Local Plan. Members have been fully consulted and briefed on the case for altering the Green Belt boundary as part of the process of preparing this report. In addition, consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 will ensure all interested parties can submit representations on the emerging Local Plan policy and the evidence base used to justify the policy options put forward by LBB.

## **6.4 Assessment against Green Belt Purposes**

Within the area of land under the control of Biggin Hill Airport, a number of land parcels have been considered for possible removal from the Green Belt. The parcels were selected on the basis that each had unique defining characteristics, strong boundaries formed of physical and policy

designations and are well understood locally as separate ‘camps’ at the Airport. They are shown on Figure 20, and are as follows:

- Land at East Camp;
- Land to the east of South Camp;
- Land at West Camp; and
- Land in the terminal area.

Using the criteria set out in the methodology, a judgment has been made in regards to the contribution of each site to the Green Belt purposes, and therefore its potential suitability for development, assessed as red, amber or green (as shown in table 3 below).

Table 7 Suitability against Green Belt purposes

Contribution	Degree of importance to meeting the Green Belt purpose
Site makes a significant contribution to Green Belt purpose	High
Site makes some contribution to Green Belt purpose	Medium
Site makes little or no contribution to Green Belt purpose	Low

Figure 20 – Sites subject to Green Belt review



The majority of the land proposed for inclusion in the SOLDC comprises LCA 1. The Airport Industrial Estate and South Camp are inset within the Green Belt within LCA 2a. To the west, the former RAF Station at West Camp – part of RAF Biggin Hill Conservation Area – falls within LCA 2b, and to the east Cudham Lodge Woods at East Camp fall within LCA 6b; that woodland is part of an extensive SINC covering much of LCA 6b. There are two small SINC's at the northern tip of the SOLDC area. There is no public access to any of the land; however, a public footpath runs along the northern and most of the eastern boundary.

### Land at East Camp

This area comprises the existing hangars and ancillary facilities at East Camp, including car parking and hardstandings for aircraft and circulation. It lies on the eastern edge of the airport, immediately south of the former tip. The potential development area would include extending northwards into part of the former tip and southwards into Cudham Lodge Woods. Much of the site is within LCA 1, but the woods are within LCA 6b.

Table 8 Assessment against Green Belt purposes (East Camp)

Green Belt purpose	Key features in relation to site	Assessment of contribution to meeting Green Belt purpose
<b>To check the unrestricted sprawl of large built-up areas</b>	There are no built up areas in the vicinity of the cluster of existing buildings beside the hangar within the southern end of Cudham Lodge Woods. East Camp is presently detached from South Camp separated by Cudham Lodge Wood.	North and south of the East Camp cluster of hangars are open and undeveloped. New buildings in the areas south and north of the existing cluster would intensify development and take the built-up area closer to South Camp and potentially resulting in the spread of Biggin Hill northwards toward the former tip site.
<b>To prevent neighbouring towns merging into one another</b>	The closest 'towns' besides Biggin Hill are Leaves Green village to the west and Downe and Berry's Green to the east.	The land is separated from the former RAF Station development and Leaves Green by the airfield. Woodland in LCA 6b to the east prevents merging with the string of settlements in LCA 4b. However, there is no suggestion that development of the airfield would result in these areas merging with future development at East Camp (as envisaged in the concept plan) due to the operational requirements of the Airport.
<b>To assist in safeguarding the countryside from encroachment</b>	The West Kent Golf Course and Down House SINC cover Cudham Lodge Woods and further east and north-east adjacent to East Camp.	Parts of the parcel are developed. However, the northern area (adjoining the site of the former tip) is not part of the airfield, and Cudham Lodge Woods to the south is a rural landscape feature and SINC. As such land to the north, east and south of the existing cluster at East Camp help to prevent development encroaching into the countryside.
<b>To preserve the setting and special character of historic towns</b>	East Camp has no heritage assets nor does it adjoin a historical town/village.	There is intervisibility across the airfield between this site and RAF Biggin Hill Conservation Area. Other features of historic interest are screened by intervening buildings, trees and woodland.

### Site of the former tip north of East Camp

This area lies within LCA 1, located on the eastern edge of the airport land. It comprises the site of a former tip and until recently was covered in deciduous woodland and scrub. This area has been cleared, leaving an area of rough, uneven ground on the edge of the airfield. It is bounded to north and east by the dense woodland of LCA 6b.

Table 9 Assessment against Green Belt purposes (former tip)

Green Belt purpose	Key features in relation to site	Assessment of contribution to meeting Green Belt purpose
<b>To check the unrestricted sprawl of large built-up areas</b>	East Camp is located to the south, with the West Kent Golf Course and Down House SINC adjoining this land.	The land is not adjacent to any built up area, the nearest built up area is the cluster of hangars at East Camp to the South.
<b>To prevent neighbouring towns merging into one another</b>	The closest 'towns' besides Biggin Hill are Leaves Green village to the west and Downe and Berry's Green to the east.	The land is remote from Biggin Hill, and separated from the former RAF Station development and Leaves Green by the airfield. Woodland in LCA 6b to the east prevents merging with the string of settlements in LCA 4b.
<b>To assist in safeguarding the countryside from encroachment</b>	The site comprises deciduous woodland and scrub land recently cleared. The West Kent Golf Course and Down House SINC is to the east.	Land surrounding Biggin Hill Airport has countryside characteristics; this land lies adjacent to the rural woodland landscape of LCA 6b and is bordered on two sides by a public footpath.
<b>To preserve the setting and special character of historic towns</b>	This area has no heritage assets nor does it adjoin a historical town/village.	There is intervisibility across the airfield between this site and RAF Biggin Hill Conservation Area. Other features of historic interest are screened by intervening buildings, trees and woodland.

### Land to the east of South Camp

This comprises a belt of open grassland at the south-eastern corner of the airfield, lying within LCA1, historical photography from the 1940s shows buildings were present in this area in the past. On the airfield side, the boundary follows Churchill Way, the access road to East Camp, which then runs through the centre of the northern part of the parcel. The site is in two parts separated by a narrow neck where the road runs close to the SOLDC boundary. There is a marked fall across the land of about 15m eastwards as it drops towards the head of a valley in the adjoining LCAs 3 and 6b. The area is open but influenced by the large buildings in South Camp and lies adjacent to the urban fringe of Biggin Hill in LCA 3.

Table 10 Assessment against Green Belt purposes (Land to the east of South Camp)

Green Belt purpose	Key features in relation to site	Assessment of contribution to meeting Green Belt purpose
<b>To check the unrestricted sprawl of large built-up areas</b>	Area includes access road to East Camp and part of the apron.	New buildings in this area would intensify development at South Camp and take the built-up area closer to East Camp, potentially resulting in the spread of Biggin Hill northwards.
<b>To prevent neighbouring towns merging into one</b>	Biggin Hill is immediately to the south-west. Berry's Green is	The land is separated from the former RAF Station development and

another	further to the east.	Leaves Green by the airfield. Woodland in LCA 6b to the east, combined with intervening features within the fringe landscape LCA 3, prevents visual and physical merging with the string of settlements in LCA 4b.
<b>To assist in safeguarding the countryside from encroachment</b>	The West Kent Golf Course and Down House SINC are situated to the north.	This parcel is influenced by the large buildings of South Camp. It is located in the area identified as Settlement Fringe (Biggin Hill / Berry's Green Fringe). A woodland belt around the perimeter of the airport at this location provides a strong boundary with the adjacent, predominantly rural LCA 3.
<b>To preserve the setting and special character of historic towns</b>	This area has no heritage assets nor does it adjoin a historical town/village.	This area is remote from areas of historic importance and new development would be unlikely to result in substantially greater impact than currently exists.

### Land at West Camp

This area lies partly within LCA 2b, largely consisting of part of Biggin Hill Conservation Area, and partly within LCA 1, which is an area of existing hangars, taxiways and hardstanding. It is bounded to the west by the A233, and to the east it is open to the airfield. The area is not characterised by openness, it is almost entirely built-up.

Table 11 Assessment against Green Belt purposes (West Camp)

Green Belt purpose	Key features in relation to site	Assessment of contribution to meeting Green Belt purpose
<b>To check the unrestricted sprawl of large built-up areas</b>	The majority of the site is built up including airside and non-airside buildings.	The site is currently part of a built-up area; development is also present on the western side of the A233.
<b>To prevent neighbouring towns merging into one another</b>	The area is well related with Biggin Hill town, separated by the Biggin Hill Public Safety Zone.	The only factor separating this area from Biggin Hill Town and South Camp is the public safety zone. When experienced at ground level West Camp is contiguous with development further south. Development of this area would not affect this purpose.
<b>To assist in safeguarding the countryside from encroachment</b>	To the east of this land parcel is operational airport land, to the West is old RAF married quarters, Officers Mess and new residential development off Barwell Crescent.	The site is not countryside, and adjoins a further built-up area to its north and west and the airfield to its east.
<b>To preserve the setting and special character of historic</b>	The area includes a number of listed buildings and RAF Biggin Hill	A substantial part of the site is within RAF Biggin Hill Conservation Area, which also contains a number of



<b>towns</b>	Conservation Area.	listed buildings. Sensitive and appropriate regeneration could be beneficial to its historic character and setting.
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### Land in the terminal area

This area adjoins West Camp to the north, and comprises the terminal building, car park, control tower, terminal hangar and extensive asphalt apron. It is located on the western edge of LCA 1, adjacent to the RAF Station development and Leaves Green to its west within LCAs 2b and 4a respectively. The southern part of the land parcel is predominantly built-up and not characterised by openness. The northern part of the parcel is adjacent to more open areas toward Leaves Green within LCA 4a, which is open.

Table 12 Assessment against Green Belt purposes (terminal area)

<b>Green Belt purpose</b>	<b>Key features in relation to site</b>	<b>Assessment of contribution to meeting Green Belt purpose</b>
<b>To check the unrestricted sprawl of large built-up areas</b>	This area includes the airport's operational buildings. There is built-up development on the opposite side of the road opposite the southern part of the parcel. West Camp lies to the south. There are open undeveloped areas in the north of the parcel with areas of Green Belt beyond the parcel to the west and north preventing ribbon development and merging with Leaves Green.	The site is already substantially developed in the southern part of the parcel. Development further north up to the fire station would be well contained by existing boundary features.
<b>To prevent neighbouring towns merging into one another</b>	Leaves Green is to the north of the terminal land parcel. There is a defined edge to development. On the eastern side of the road there are two dwellings between the terminal area and Leaves Green.	Existing built development is concentrated within the southern part of the area adjacent to the Biggin Hill former RAF Station development, with an area of lower-key development at its northern end. The open area between the airport and Leaves Green would not be affected with a clear gap and separation maintained.
<b>To assist in safeguarding the countryside from encroachment</b>	Countryside is present on the western side of the A233, including Leaves Green itself which is designated Access Land under the Countryside and Rights of Way Act 2000 which means it is defined as 'open country'.	The terminal area is not countryside although on the western side of the A233 there is 'open country'. LCA 1 lies to the east, and LCA 4a to the north and west. The A233 and parcel boundary would not allow encroachment into the countryside.
<b>To preserve the setting and special character of historic towns</b>	West Camp adjoins the terminal parcel at its southern edge, which is the northern end of Biggin Hill RAF Station. The former married quarters are located on the other side of the A233 and Leaves Green is to the north.	The southern end of the site is adjacent to RAF Biggin Hill Conservation Area and there are several listed buildings in Leaves Green. Development in this area would have little impact on their setting.



## 6.5 Green Belt Summary

West Camp is not characterised by openness, it is almost entirely covered in built development and surrounded by high levels of built development beyond the assessed parcel. The landscape assessment places the land within the LCA2b urban area meaning it is well contained by the A233 and further built up development on the western side of the road. Experienced at street level West Camp feels contiguous with the built up area of Biggin Hill. The assessment has found that it is making little or no contribution to the five purposes of Green Belt. A wider sustainability consideration for this parcel is the presence of a number of listed buildings and the fact it is a Conservation Area. Removal of Green Belt in this area would help to facilitate renewal and regeneration of this part of the SOLDC and help to bring back into use valued heritage assets by helping to de-risk the parcel for future investors/applicants.

The Terminal area is also predominantly built upon with one area in the north remaining open. However, this area is well contained by the existing urban area and boundary features: the Terminal building and car park to the south, two residential properties and the A233 to the west, the Airport fire station to the north and large tract of Airport apron to the east. Green Belt land outside the assessed parcel to the west and north will ensure continued separation with Leaves Green and no encroachment into the wider countryside to the west.

The area East of South Camp includes undeveloped land that is open. However, much of this area was historically previously developed land. In addition, the area was found to have urban edge characteristics (LCA3) due to its relationship with South Camp and the settlement of Biggin Hill Town to the south. The parcel would be well contained and contiguous with the existing South Camp/wider industrial area and Biggin Hill Town with strong boundary features.

East Camp displays low levels of containment and is not surrounded by built development. East Camp is more isolated than the other parcels with the nearest developed land some distance from the existing cluster of hangars. Much of this parcel is undeveloped and open land. Purpose 5 is generally a purpose fulfilled by all Green Belt but in this instance it's noteworthy that East Camp would utilise the most new greenfield land in an area that does not contain urban characteristics. The other parcels have urban characteristics (i.e. West Camp and Terminal) or urban fringe characteristics (as in the case of East of South Camp), whereas the current East Camp cluster is adjacent to open countryside LCA6b. The ZTVs highlighted that East Camp is located in a sensitive landscape area and development envisaged under the concept plan would be more visible in comparison to other areas in the SOLDC. Wider sustainability considerations for East Camp include the proximity of the SINC/Ancient Woodland/Deciduous Woodland (a UK priority habitat), the concept plan envisages development in Cudham Lodge Woods which would result in the loss of this irreplaceable woodland. Parts of the parcel help to protect wider open land that has countryside characteristics.

# 7 CAPACITY ANALYSIS

## 7.1 Concept plan and land parcel analysis

The Economic Growth Plan (NLP, April and June 2014) envisages an approximate development quanta of:

- 48,198m<sup>2</sup> new build floorspace; and
- 43,534m<sup>2</sup> refurbished/relocated floorspace.

This amount of floorspace is expected to be split by use class as follows:

- Hangarage 50,918 m<sup>2</sup>;
- B1 office space 23,300 m<sup>2</sup>; and
- B2 Industrial space 17,514 m<sup>2</sup>.

Table 13 sets out how this development could be phased over the plan period based upon the airport's current indicative plans for decanting and development. Figure 21 depicts the current buildings and Figure 22 shows the retained and proposed new buildings under the concept plan.

Table 13 Phasing plan (based on phases of 5-7 years)

New and refurbished/relocated floorspace	
<b>Phase 1</b>	<ul style="list-style-type: none"> <li>• 17,166 m<sup>2</sup> new</li> <li>• 9,894 m<sup>2</sup> redeveloped / relocated</li> </ul>
<b>Phase 2</b>	<ul style="list-style-type: none"> <li>• 14,750 m<sup>2</sup> new</li> <li>• 15,279 m<sup>2</sup> redeveloped / relocated</li> </ul>
<b>Phase 3</b>	<ul style="list-style-type: none"> <li>• 16,462 m<sup>2</sup> new</li> <li>• 18,361 m<sup>2</sup> redeveloped / relocated</li> </ul>

Figure 21 – Existing floorspace (shown in blue)

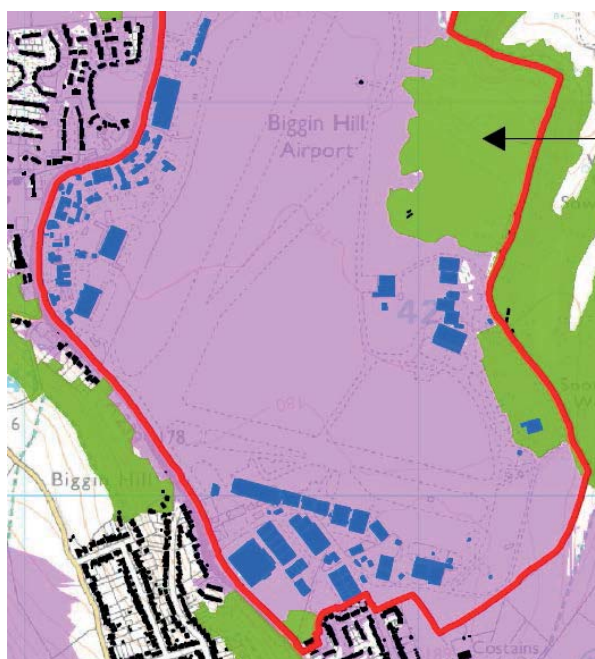


Figure 22 – Concept Plan retained and proposed new floorspace



The delivery and phasing rationale put forward by the Airport is based upon:

- Five aircraft Original Equipment Manufacturers (OEMs) moving to Biggin Hill over 15-20 years;
- Two expanded Aircraft Operating Companies (AOCs)/Fixed Base Operators (FBOs) and four new AOCs attracted to the airport over 15-20 years;
- 5 new hangars for aircraft parking. Existing businesses have a space requirement for three additional hangars each of over 3,700 m<sup>2</sup> over the next three years;
- A small heritage facility;
- 16 individual plots for manufacturing businesses associated with suppliers to aviation businesses offering 17,500 m<sup>2</sup> of light industrial space ;
- 13,700 m<sup>2</sup> of new build/converted accommodation for office use on West Camp (though alternatives may be possible). Built out from phase 2 onwards but principally in phase 3, as demand for commercial space at West Camp is expected to follow the momentum generated by take-up of air-side space on other parts of the airport; and
- Replacement space for existing operators.

Using information supplied by the Locate Partnership we have attempted to show how the concept plan would translate into totals for new or retained floorspace, based on what might theoretically be achieved over the plan period (if all parcels of land were developed).

Table 14 Floorspace analysis using working draft concept plan (estimates rounded and based on land parcels - subject to review<sup>41</sup>)

	Current (m <sup>2</sup> )	Retained (m <sup>2</sup> )	New (m <sup>2</sup> )	Total (New/ Retained) m <sup>2</sup>	Net increase on current m <sup>2</sup>
West Camp	15,700	7,600	16,800	<b>24,400</b>	<i>8,700</i>
Terminal Area	7,400	7,000	8,000	<b>15,000</b>	<i>7,600</i>
East Camp	11,600	3,700	21,500	<b>25,200</b>	<i>13,600</i>
Land East of South Camp	0	0	16,300	<b>16,300</b>	<i>16,300</i>
South Camp (outside of Green Belt)	19,300	9,600	21,400	<b>31,000</b>	<i>11,700</i>
Business Area (non- Green Belt)	22,500	22,500	3,200	<b>25,700</b>	<i>3,200</i>

We then compared the size of the old UDP major developed sites with the parcels subject to assessment (Figure 20) to understand the land requirement for delivery of the concept plan.

Figure 23 – UDP Major Development Sites in the Green Belt

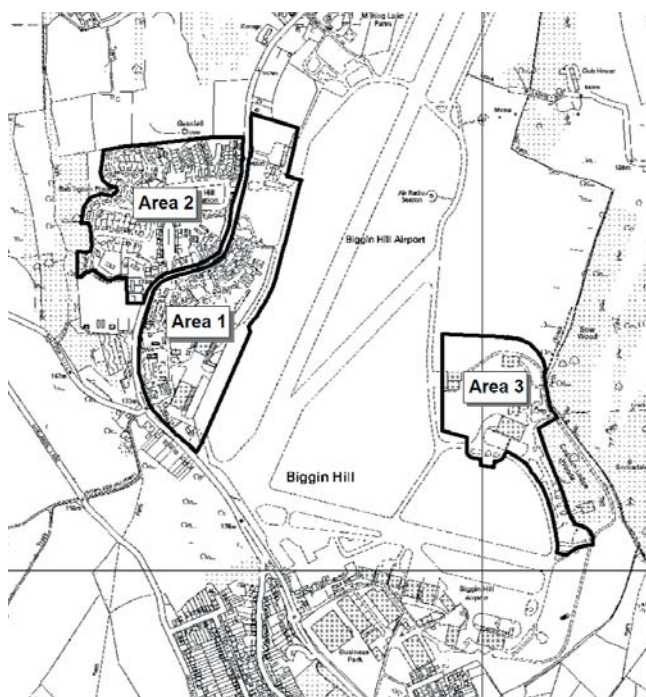


Table 15 Site areas of parcels subject to review

<sup>41</sup> The floorspace figures are approximations based on the Concept Plan indicative figures. They are used to help highlight the potential changes at the Biggin Hill SOLDC, the final figures will be based upon more detailed masterplanning and/or planning applications

Feature	Area (ha)
West Camp and Terminal Area MDS	18.01
East Camp MDS	11.02
South Camp	11.01
Business Area near South Camp	7.21

Table 16 Analysis of indicative net increase from parcels subject to review

Land parcel(s)	Approximate area (ha)	Total (New/ Retained) commercial floorspace (m <sup>2</sup> )
West Camp and Terminal area	25.15	39,400 m <sup>2</sup> (16,300 m <sup>2</sup> net increase on current)
Land east of South Camp	7.31	16,300 m <sup>2</sup> (16,300 m <sup>2</sup> net increase on current)
East Camp	15.32	25,200 m <sup>2</sup> (13,600 m <sup>2</sup> net increase on current)
All land parcels	47.78	80,900 m <sup>2</sup> (46,200 m <sup>2</sup> net increase on current)
West Camp/Terminal area and land east of South Camp	32.46	55,700 m <sup>2</sup> (32,600 m <sup>2</sup> net increase on current)

Table 16 shows the potential development capacity based on differing levels of land released from the Green Belt. This does not take into account alternative development layouts and simply provides a high-level snapshot of the development potential based upon the footprints included in the concept plan. Table 16 does not consider detailed decanting strategies and does not include an analysis of likely occupiers.



### 7.3 Conclusions and recommendations

The Planning Advisory Service (PAS) practice note advises that *‘the purpose of a [Green Belt] review is for the identification of the most appropriate land to be used for development, through the local plan. Always being mindful of all of the other planning matters to be taken into account and most importantly, as part of an overall spatial strategy’*. PAS highlight that it's a matter of law that *‘any person or body engaged in the preparation of Local Development Documents must exercise the function with the objective of contributing to the achievement of sustainable development’* (2004 Planning Act). In addition, the NPPF requires plan makers to take account of the need to promote sustainable patterns of development when altering Green Belt boundaries (paragraph 84).

The most sustainable locations for new development are usually well served by existing infrastructure and do not conflict with specific policies in the NPPF that indicate where development should be restricted. PAS advocate the consideration of wider sustainability issues as well as the five purposes of Green Belt when making professional judgements to alter Green Belt boundaries:

*“where necessitated by the development requirement, plans should identify for development of the most sustainable locations, unless outweighed by effect on the overall integrity of the Green Belt according to an assessment of the whole of the Green Belt according to the five purposes.”*

The methodology employed for this study ensures that the Green Belt assessments and landscape assessment elements of this report can stand on their own. AECOM's recommendations to LBB are based upon the following considerations and professional judgements:

- The parcels current contribution to openness and preventing sprawl
- A composite judgement based upon the parcels contribution against the five purposes of Green Belt
- Wider sustainability considerations

In considering what would be the most sustainable approach a number of factors have been considered:

- Are there clear strong and robust boundaries to contain development and prevent encroachment in the long term?
- Are there already significant urbanising influences?
- Has there already been encroachment by built development?
- Would encroachment of the built environment harm features of nature conservation value and other factors such as landscape character?

When altering the Green Belt a strong boundary should be created with a clear distinction between urban areas and open countryside. Future development of the SOLDC should be firmly contained by strong physical features. Paragraph 85 states that when defining boundaries, local planning authorities should:

- *ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
- *not include land which it is unnecessary to keep permanently open;*
- *where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*



- *make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;*
- *satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
- *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.*

Green Belt is characterised by its permanence, alterations to boundaries must be able to endure beyond the plan period so as not to require amendments in the near future. As such it's important that future development is firmly contained by strong or physical features.

LBB must balance the economic case and demand highlighted by the Airport (as illustrated in the concept plan) with the wider sustainability considerations resulting from intensifying development at the SOLDC such as possible environmental/landscape impacts and accessibility issues (as highlighted in 4.6). AECOM's previous study noted that the Locate Partnership's concept plan would be challenging to deliver with the growth envisaged over the plan period without transformational change:

*“Overall the economic growth plan and supporting documents present an ambitious strategy for the development of Biggin Hill. Whilst the potential for growth is acknowledged, the suggested targets will be challenging. The methods used to calculate impacts are reasonable, with the analysis presenting a positive view of future growth potential....There is also some conflicting evidence provided which suggests that business aviation traffic in Europe is declining, a position which could adversely affect the airport's wider vision for growth...The evidence suggests a challenging environment in which to achieve economic growth at Biggin Hill”<sup>42</sup>*

The findings in this report highlight that the East Camp parcel is making a contribution to the Green Belt and openness of the area (more so than the other parcels assessed). Development south of the existing East Camp would encroach into Cudham Lodge Woods. Development here would result in the loss of irreplaceable ancient woodland, harm the integrity of the SINC and encroach into an area of the Airport that has countryside characteristics. Ancient woodland benefits from its own statutory protections and a substantial degree of permanence, loss of this woodland is not favourable in light of NPPF policy and environmental and nature conservation policy in the emerging Local Plan. Removal of the areas north and south of the existing East Camp cluster from Green Belt would detrimentally undermine the overall openness of the wider Green Belt. In addition, ZTV analysis illustrates that East Camp is in a more sensitive location within the landscape.

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<sup>42</sup> Planning for Growth in Bromley - Biggin Hill Study - Final Report

We recommend that LBB release all parcels assessed with the exception of East Camp (see Figure 24 - Areas recommended for removal from the Green Belt in Appendix 1). This course of action would result in the following reductions to Green Belt at the SOLDC:

- West Camp total -13.4 ha
- Terminal total -9.2 ha
- East of South Camp total -7.3 ha
- **Total amount of Green Belt proposed for deletion: 29.9ha**
- **Approximate airside/aviation land of total<sup>43</sup>: 23.3ha**

NPPF paragraph 81 states that once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use. In this instance we recommend that the East Camp parcel is retained to help preserve openness and enhance the wider landscape, visual amenity and biodiversity of the wider area. However, the Local Plan should positively encourage regeneration and renewal of the existing East Camp cluster to help contribute to the job target within the Locate Partnership growth plan. Alongside supportive Local Plan policy, infrastructure upgrades (across the whole SOLDC including East Camp) should be pursued and explicitly referenced in LBB's Infrastructure Delivery Plan.

The recommended deletions proposed for West Camp, Terminal and East of South Camp would utilise the following physical features:

- The A233 Main road (A road) – a clearly identifiable physical boundary with strong permanence
- Existing development cluster with strong established boundaries e.g. West Camp provide strong identifiable boundary with strong permanence
- Prominent field/property boundaries - clearly defined and accompanied by continuous physical features such as mature hedges and trees lines and fencing (found throughout the SOLDC)
- Woodlands providing a tree line of mature trees for a permanent and identifiable boundary - – utilised for part of the suggested East of South Camp boundary and Terminal area
- Internal access roads act as a clearly defined boundary with a substantial degree of permanence – utilised for part of the suggested East of South Camp boundary

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<sup>43</sup> Excluding non-airside to provide an indication of the split between airside hangarage and non-airside ancillary services.

## ***APPENDIX 1 FIGURES***



\*indicative boundary digitised by URS, based upon Biggin Hill Airport (July 2008) information

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BIGGIN HILL

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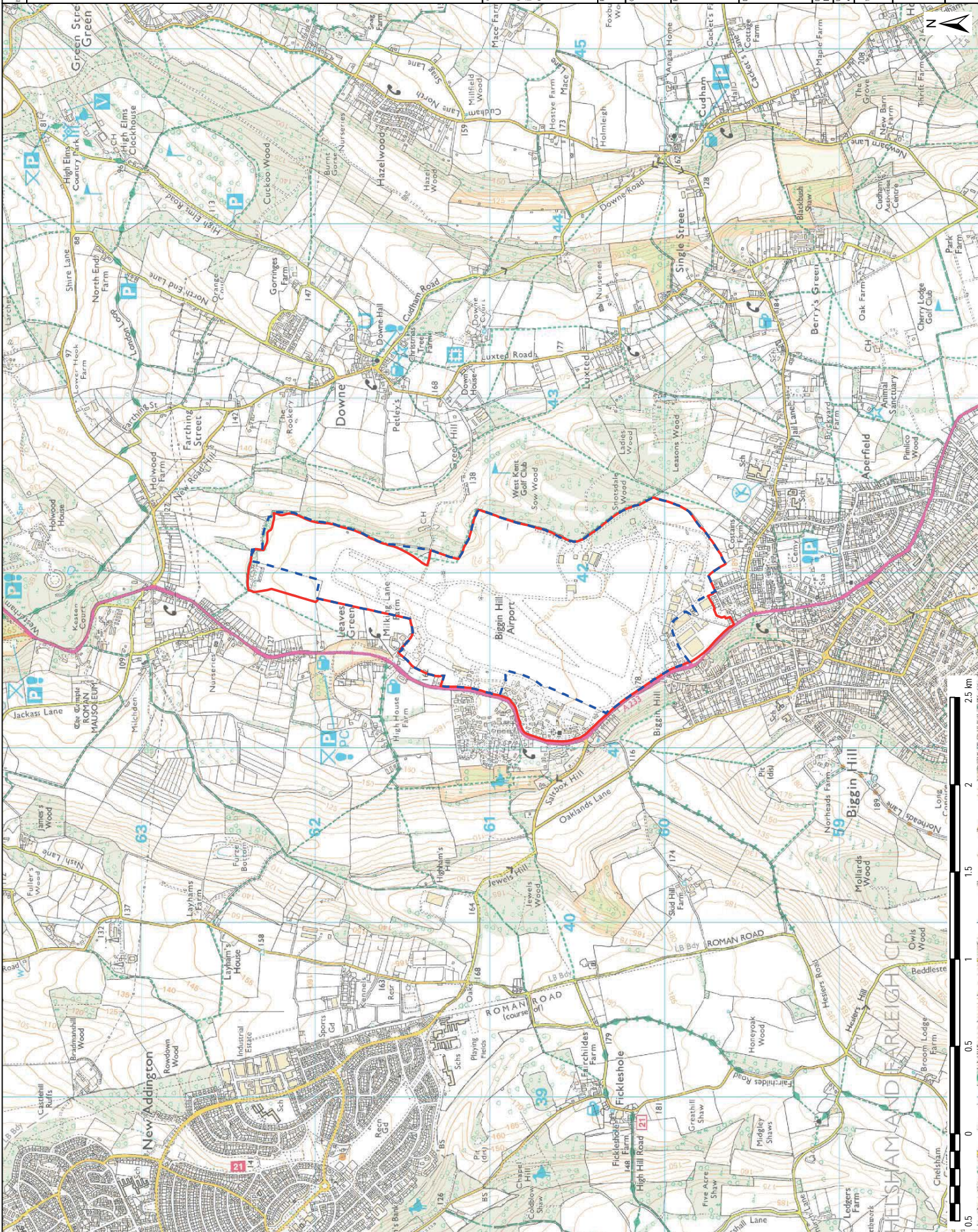
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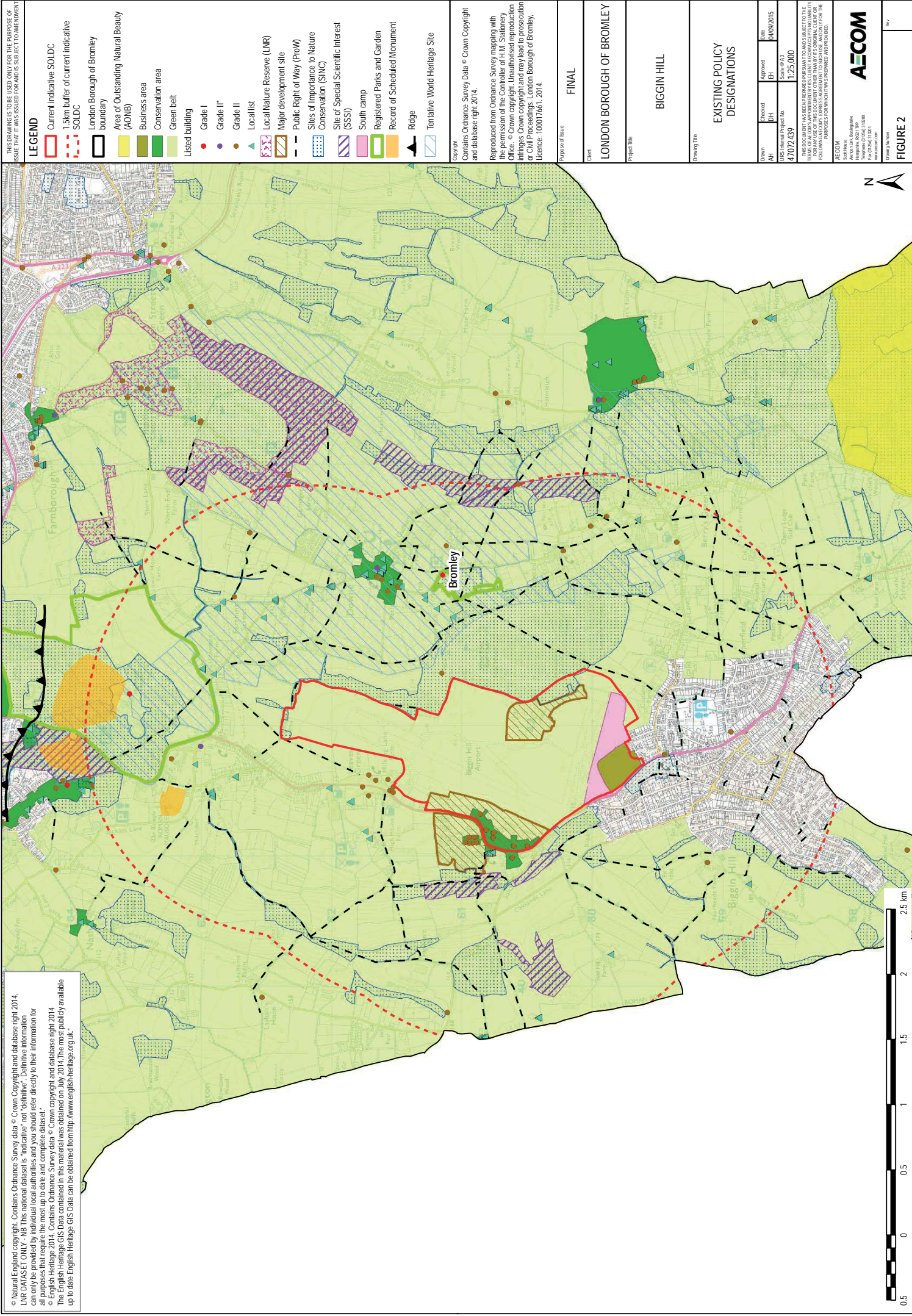
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## FIGURE 1







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- LEGEND**
- Current Indicative SOLDC
  - 1.5km buffer of current indicative SOLDC
  - London Borough of Bromley boundary
  - Area of Outstanding Natural Beauty (AONB)
  - Business area
  - Conservation area
  - Green belt
  - Listed building
  - Grade I
  - Grade II\*
  - Grade II
  - Local list
  - Local Nature Reserve (LNR)
  - Major development site
  - Public Right of Way (Prow)
  - Sites of Importance to Nature Conservation (SINC)
  - Site of Special Scientific Interest (SSSI)
  - South camp
  - Registered Parks and Garden
  - Record of Scheduled Monument
  - Ridge
  - Tentative World Heritage Site

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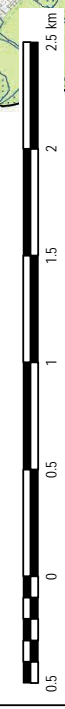
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FIGURE 2

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**LEGEND**

- Current indicative SOLDC
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- Borough/district boundary
- Topography (m)
  - High : 240
  - Low : 67

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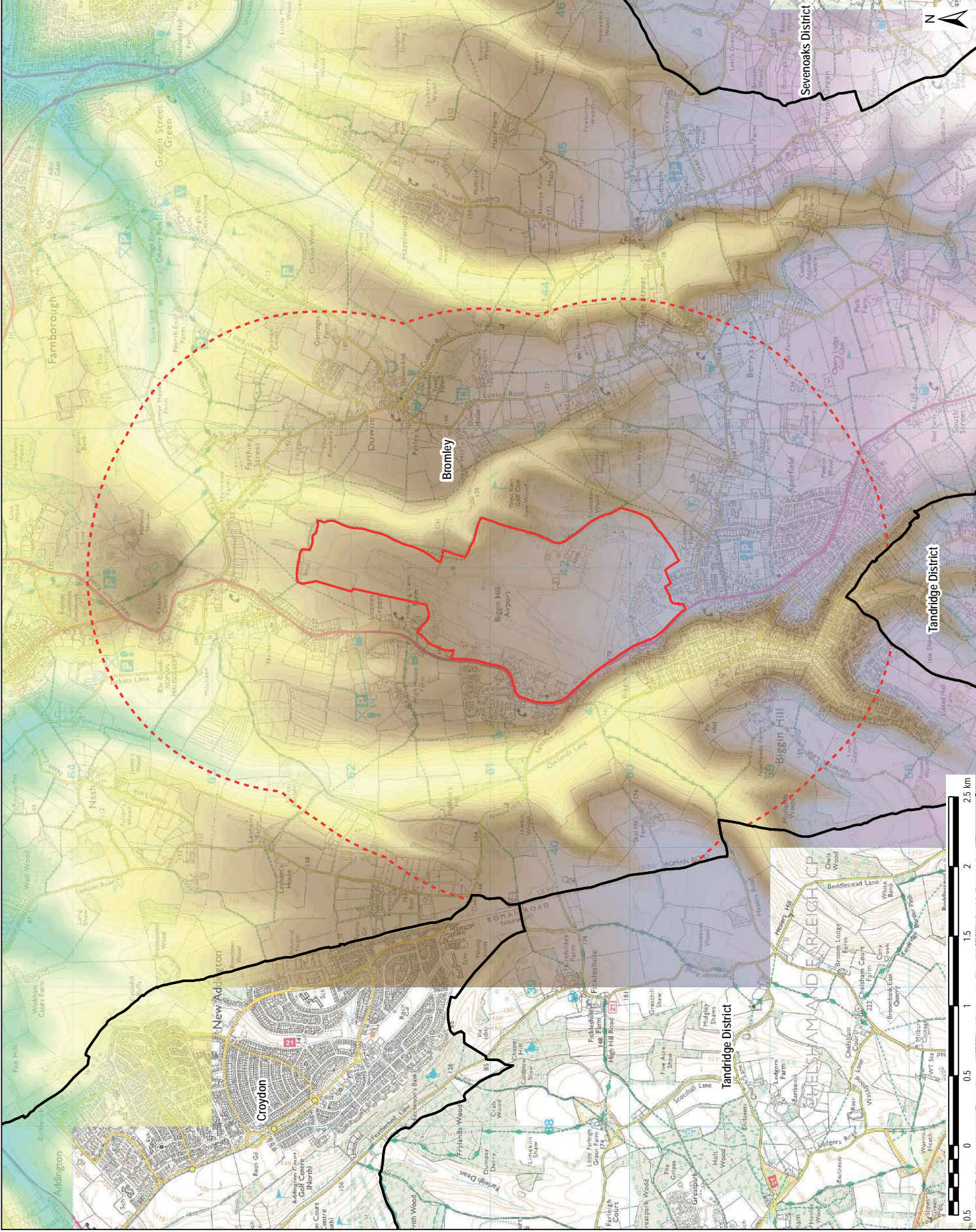
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FIGURE 3





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**LEGEND**

Current Indicative SOLDC

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Project Title

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Drawing Title

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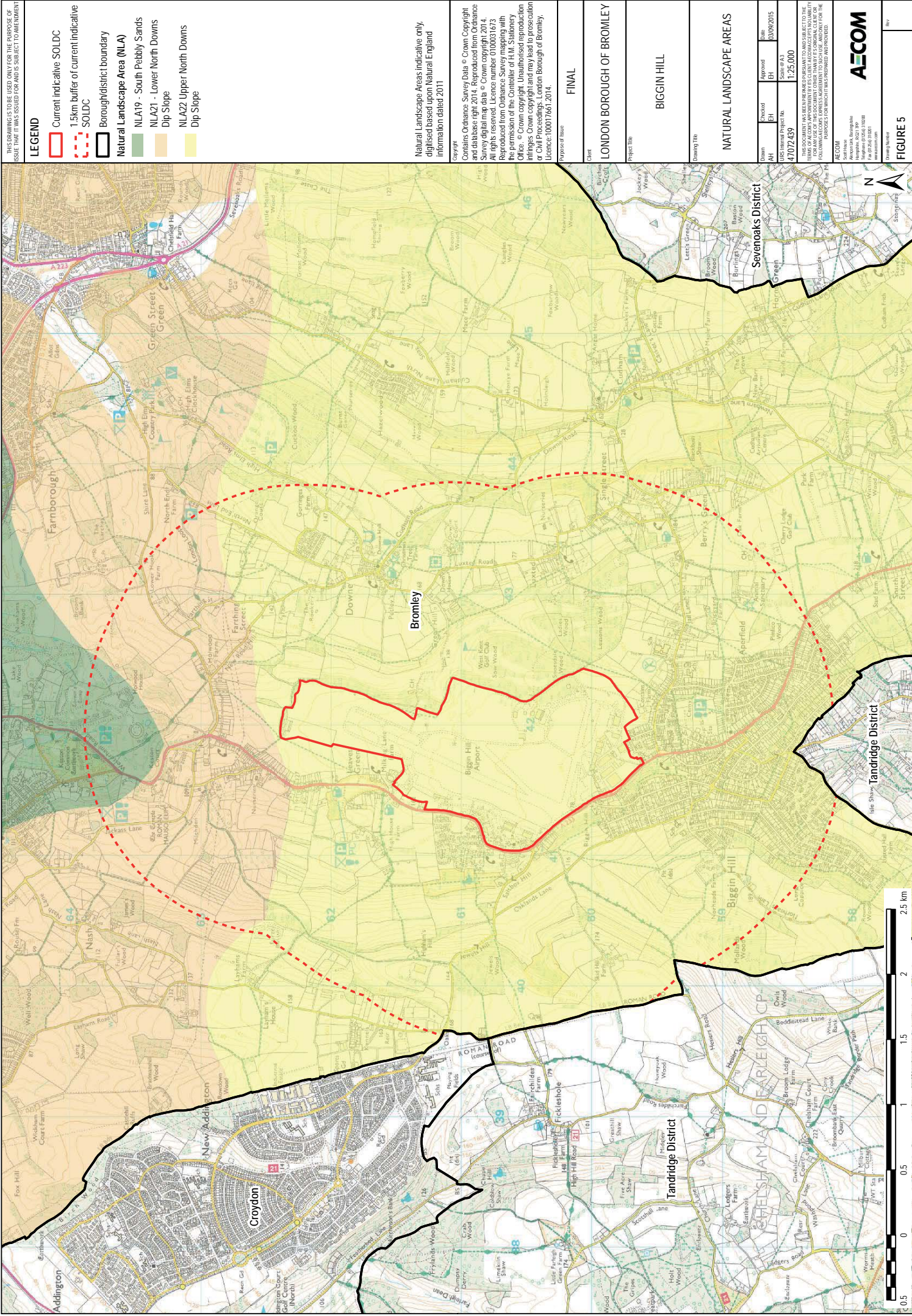
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**FIGURE 4**







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- LEGEND**
- Current Indicative SOLDC
  - 15km buffer of current indicative SOLDC
  - Borough/district boundary
  - Natural Landscape Area (NLA)
  - NLA19 - South Pebbly Sands
  - NLA21 - Lower North Downs
  - Dip Slope
  - NLA22 Upper North Downs
  - Dip Slope

Natural Landscape Areas indicative only, digitised based upon Natural England information dated 2011

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**LEGEND**

Current indicative SOLDC

1.5km buffer of current indicative SOLDC

Borough/district boundary

Local Landscape Character Area

LCT 1: Airfield

LCA 1: Biggin Hill Airport

LCT 2: Urban

LCA 2a: Biggin Hill

LCA 2b: Biggin Hill RAF Station

LCT 3: Settlement Fringe

LCA 3: Biggin Hill / Berry's Green Fringe

LCT 4: Settled Plateau

LCA 4a: Leaves Green

LCA 4b: Downe and Berry's Green

LCT 5: Open Plateau

LCA 5: Ficksdale Plateau

LCT 6: Wooded Valley

LCA 6a: Upper Ravensbourne Valley

LCA 6b: Upper Cray Valley

LCA 6c: Cudham Valley

LCT 7: Wooded Parkland

LCA 7: Holwood Ridge

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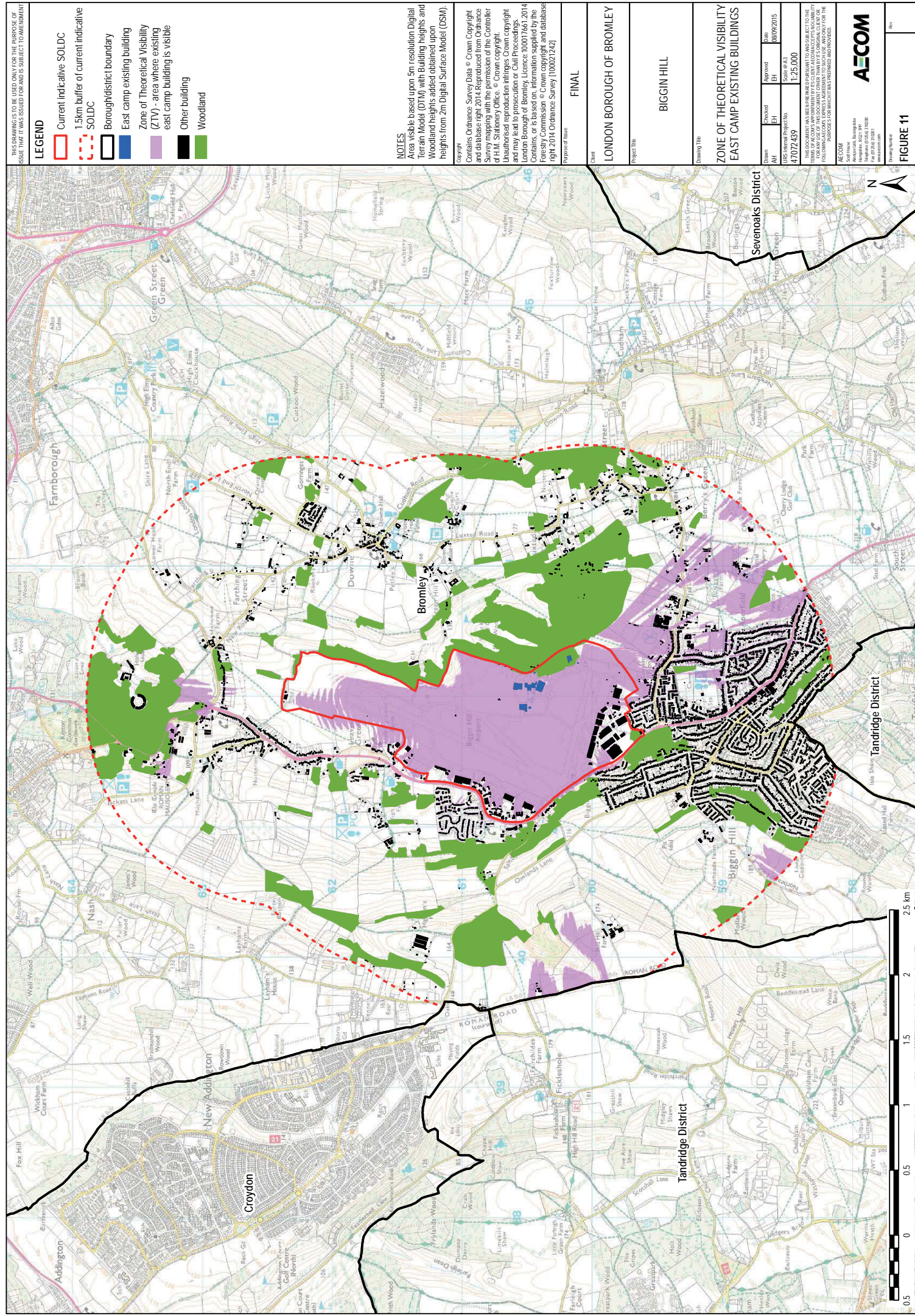
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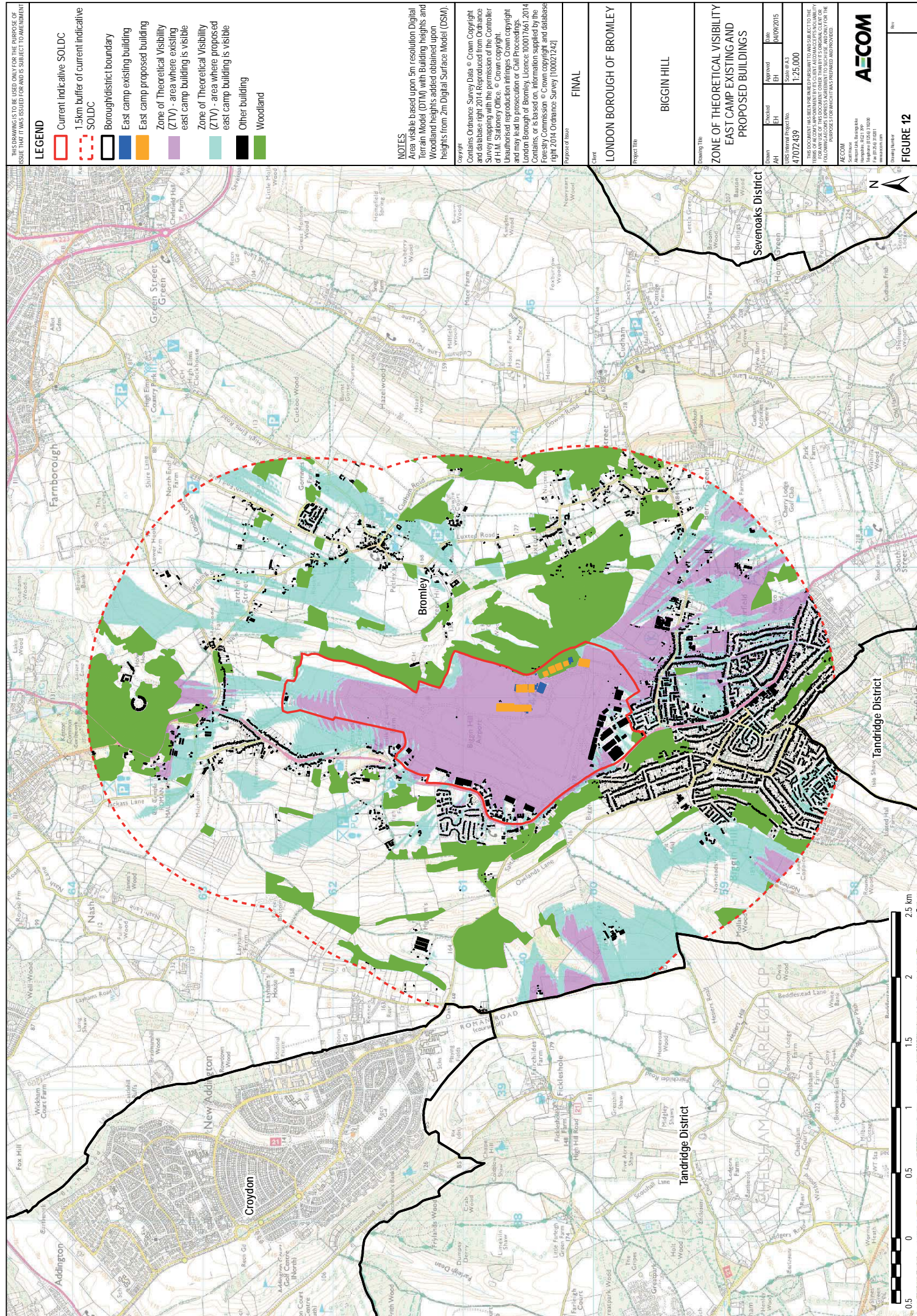
Figure 10

File Name: I:\5004 - Information Systems\470 - Biggin Hill, Approved, BMS\BMS\Figure 6 Local Landscape Character Areas.mxd



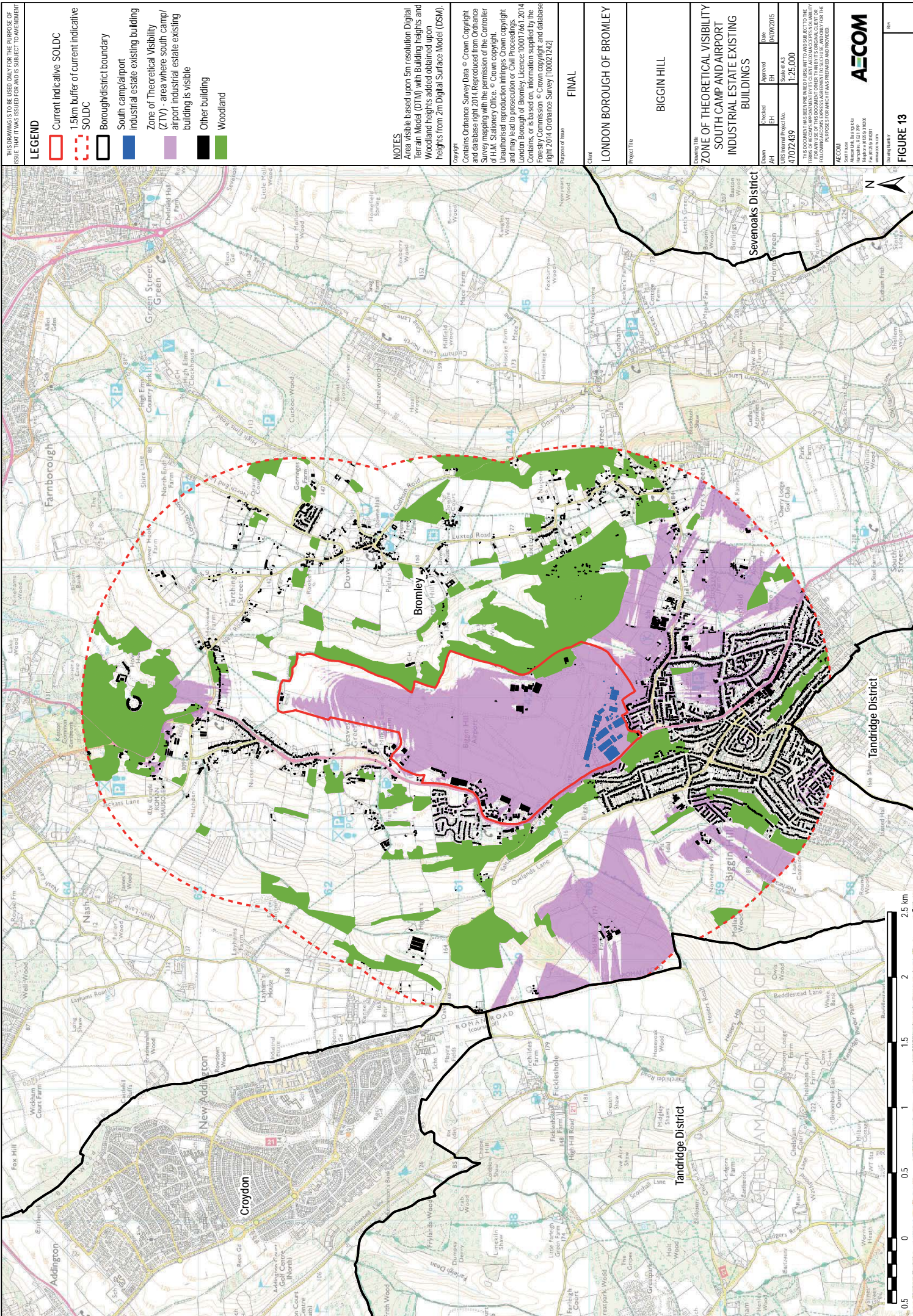




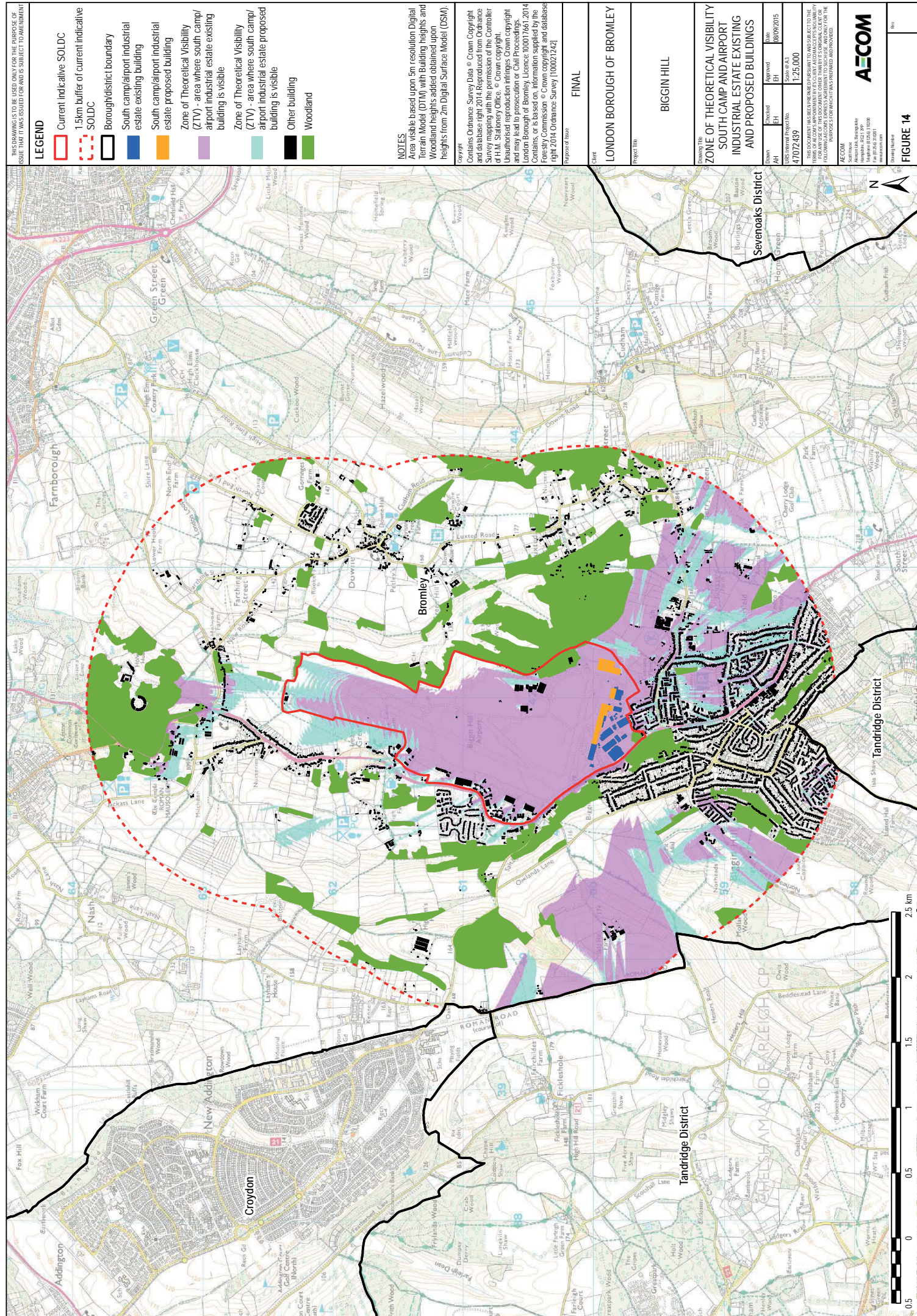


**FIGURE 12**  
crating names

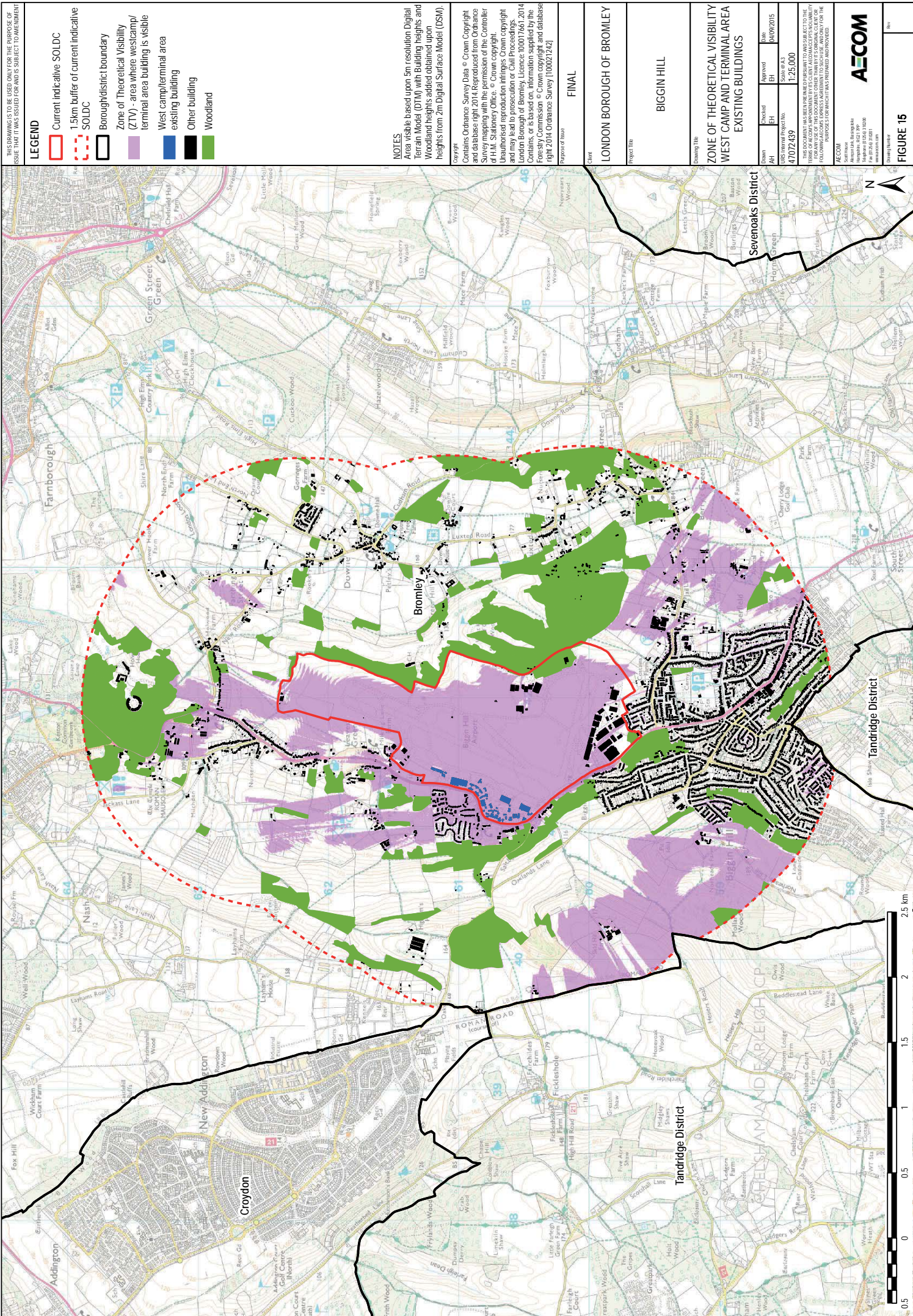




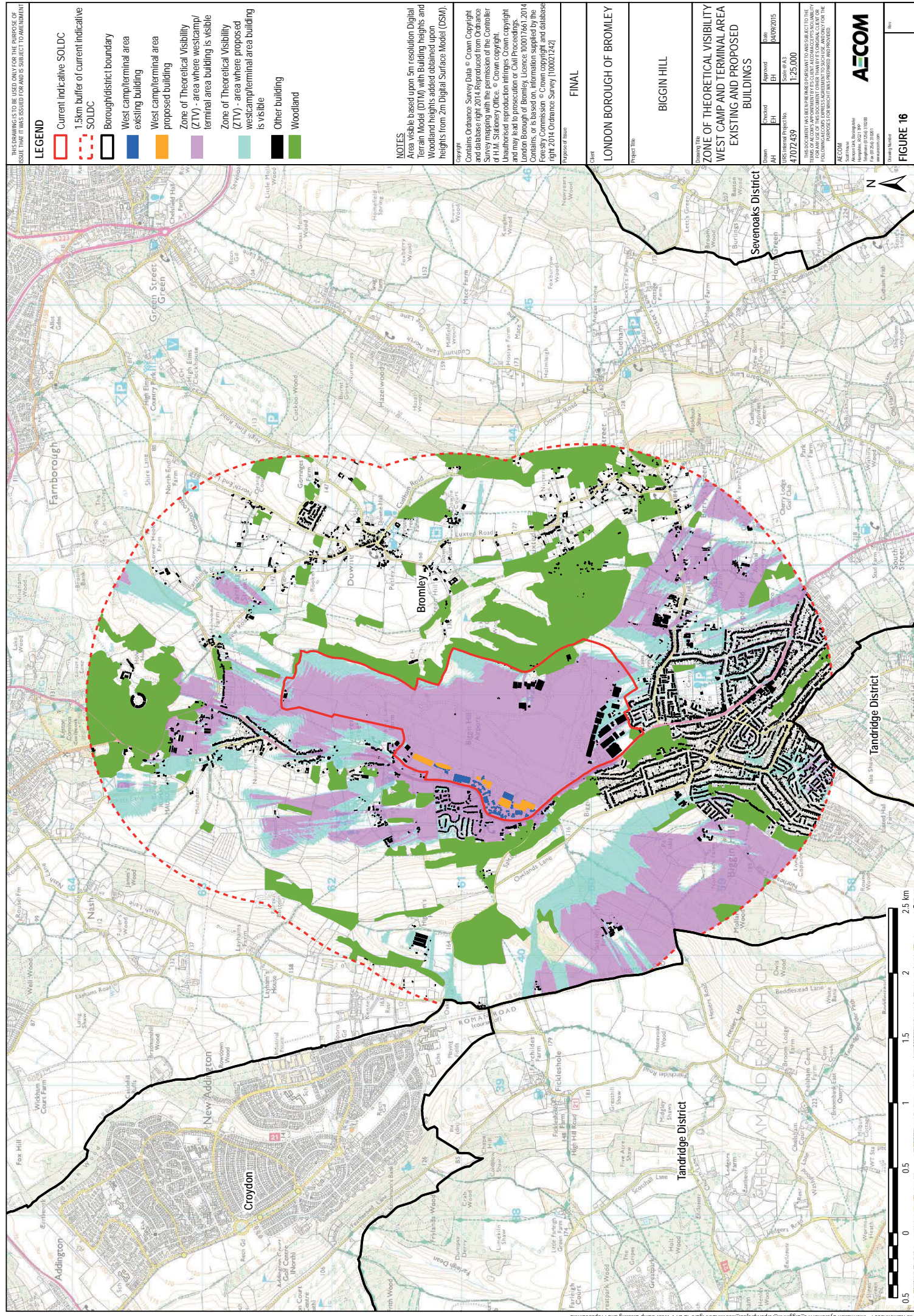




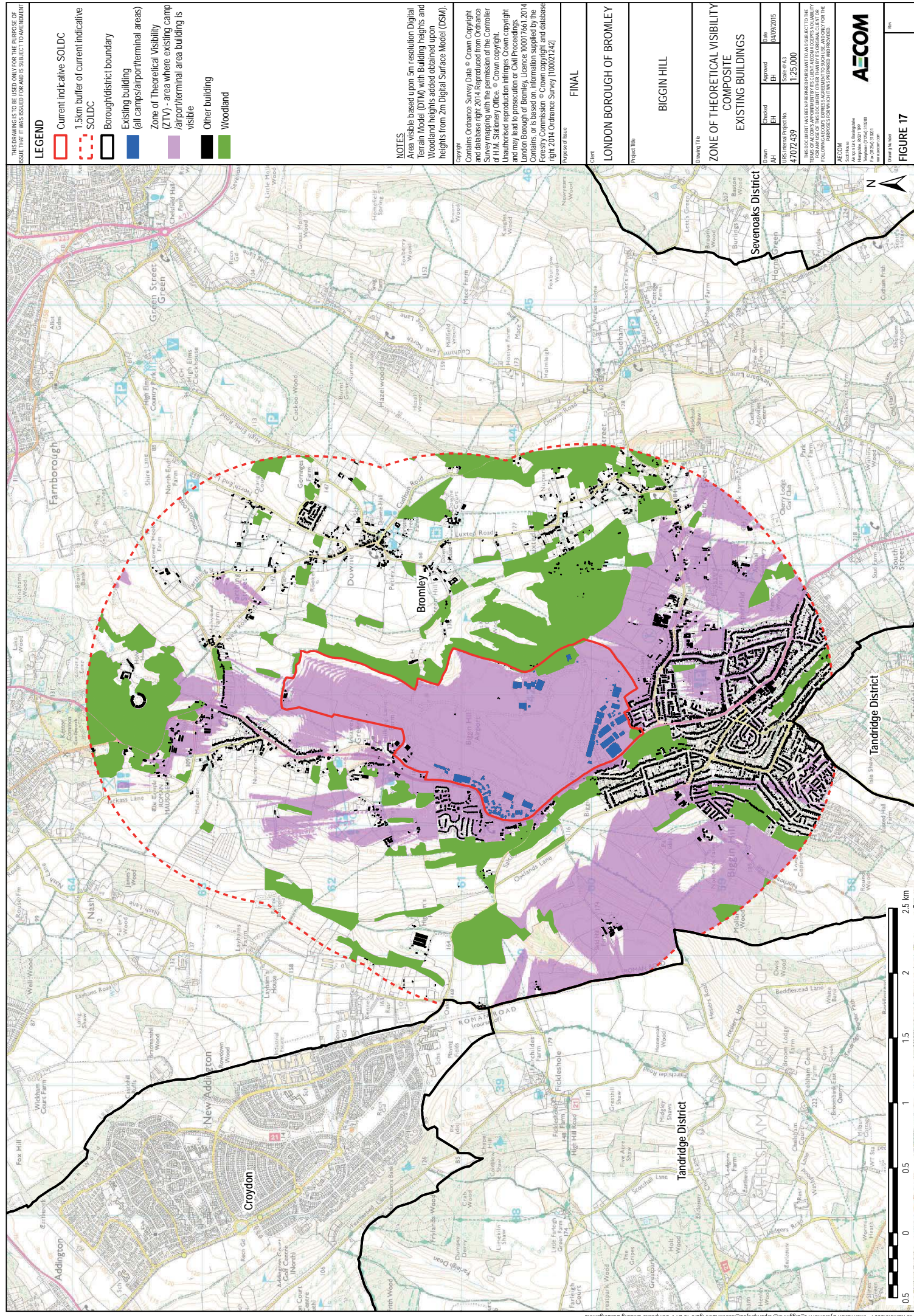




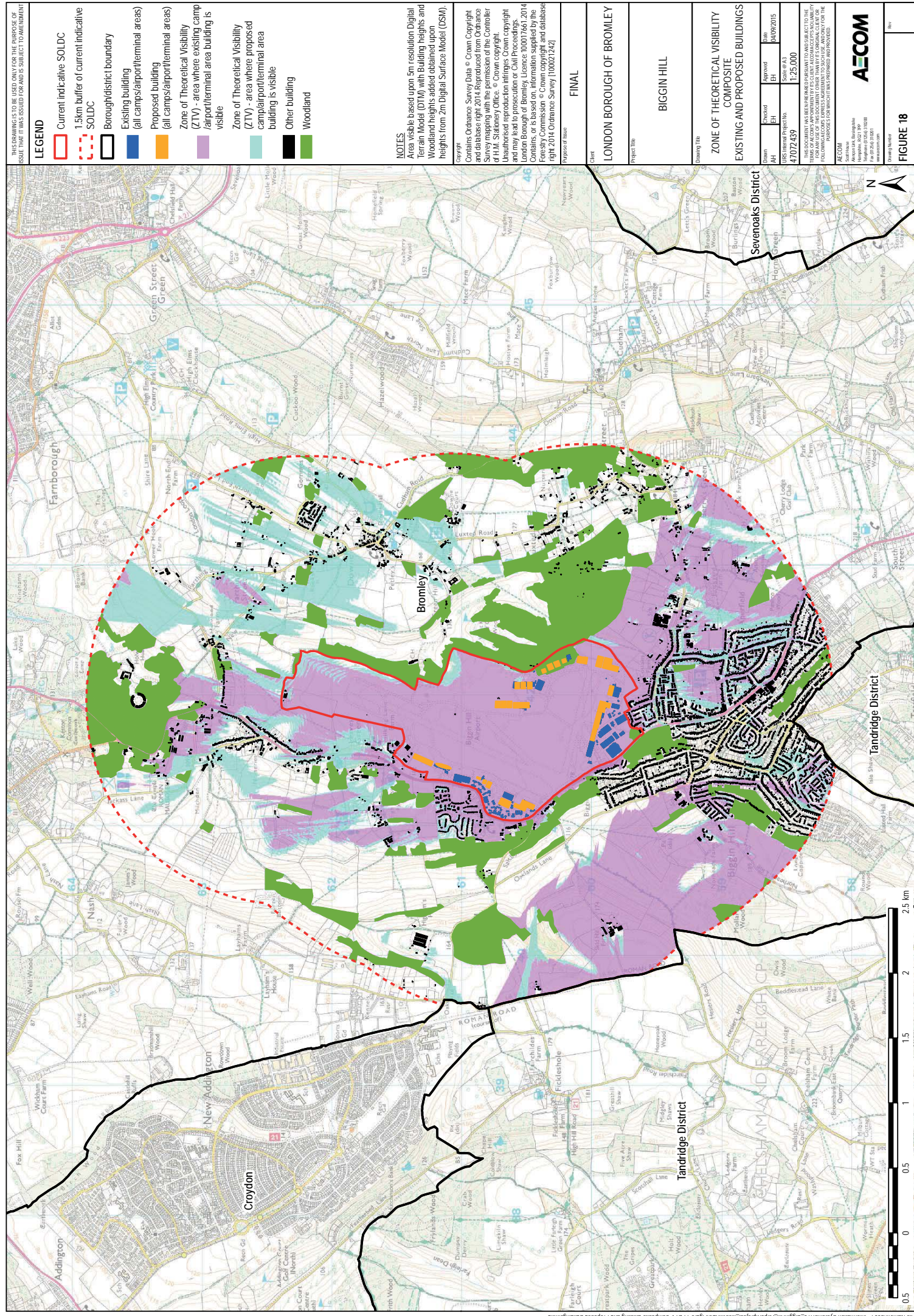




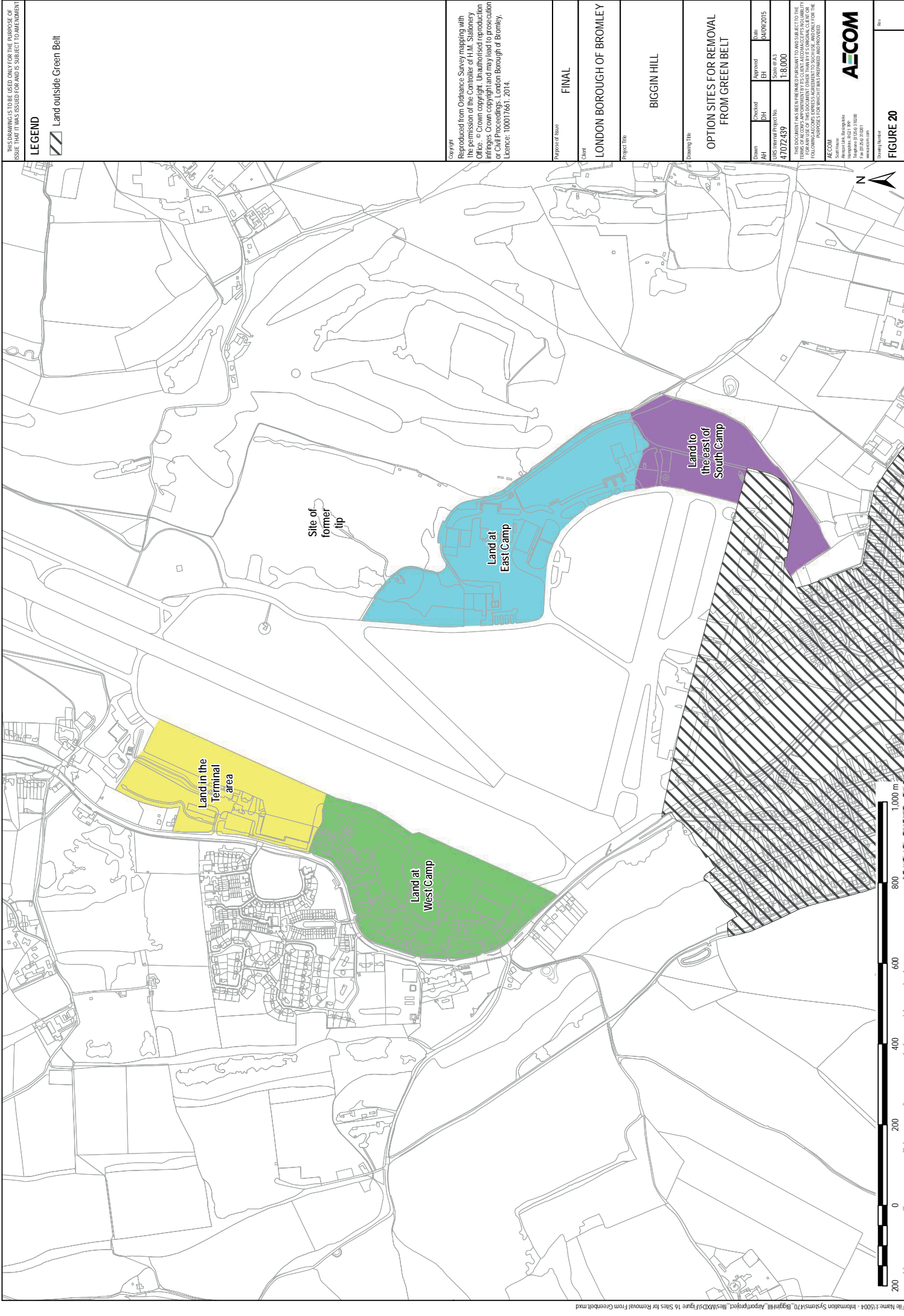




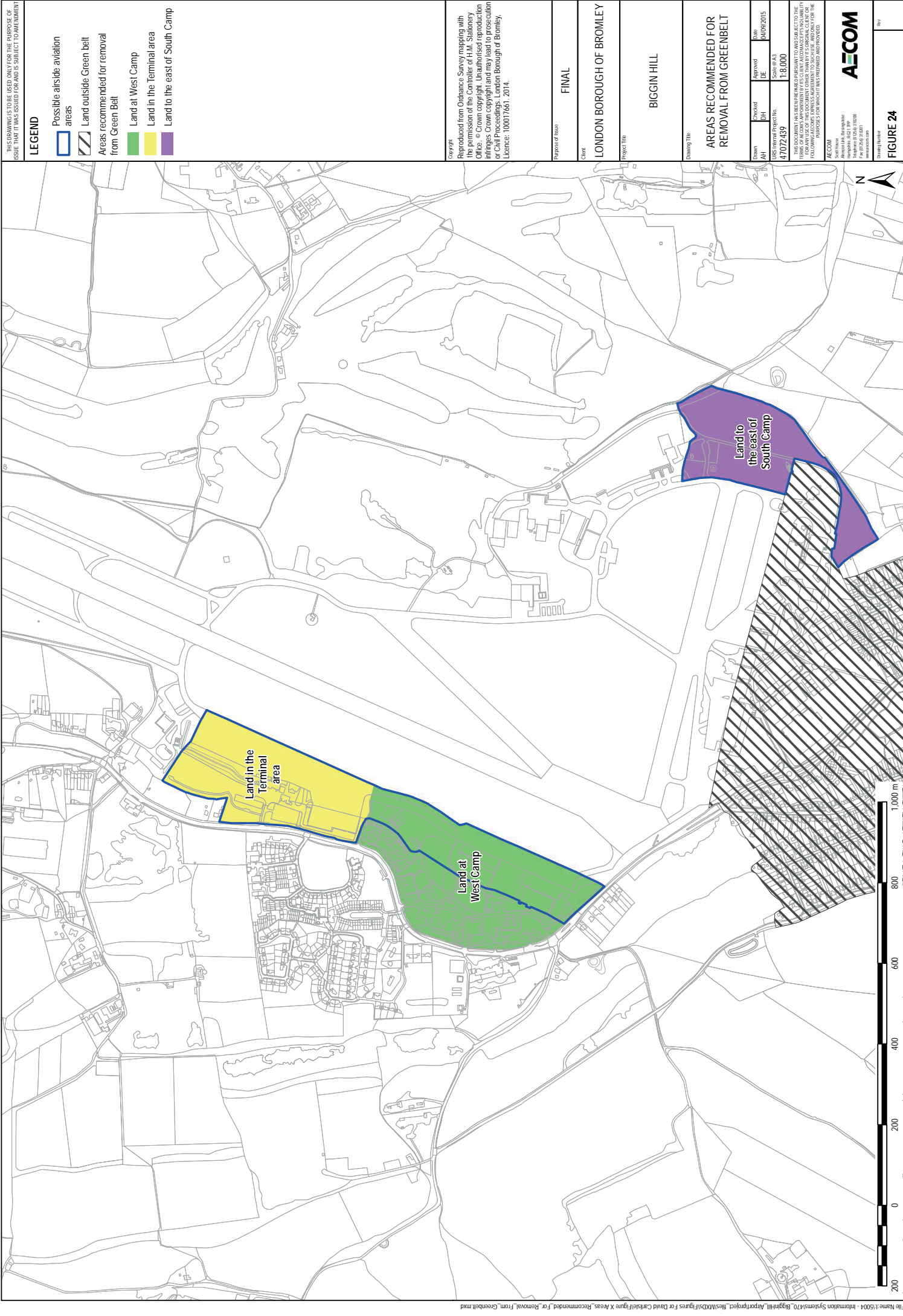












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