

SECTION '1' – Applications submitted by the London Borough of Bromley

Application No : 17/00728/FULL1

Ward:
Biggin Hill

Address : St Georges RAF Chapel Main Road Biggin Hill TN16 3EJ

OS Grid Ref: E: 541078 N: 160603

Applicant : Biggin Hill Memorial Museum Trust

Objections : YES

Description of Development:

Proposed Memorial Museum (Use Class D1) with ancillary café/ shop (Use Class A1/A3) with associated car parking, landscaping and alterations to the access points, demolition of modern annex building at St Georges Chapel and minor alterations to the listed building.

Key designations:

Conservation Area: RAF Biggin Hill
Biggin Hill Noise Contours
Biggin Hill Safeguarding Area
Green Belt
London City Airport Safeguarding
Major Development Sites
Smoke Control SCA 24
Technical Sites BH

Location

St Georges RAF Chapel is located on the eastern side of Main Road. The site is designated as being within the Major Developed Site Area 1 (West Camp) of the wider Biggin Hill Airport site and is located within the Green Belt. The Chapel and wider area also form part of the Biggin Hill RAF Station Conservation Area. The Chapel is Grade II Listed. Biggin Hill is identified in the London Plan as a designated Strategic Outer London Development Centre (SOLDC).

The site is bounded to the north and east by the wider Biggin Hill Airport site and lies in close proximity to the Passenger Terminal and Control Tower. To the west of Main Road opposite the site is the Officers Mess building which is statutory Grade II listed and to the south is Station Headquarters (Building 33) which is also Grade II listed.

The Chapel has a single primary access from Main Road with parking for visitors located to the northern elevation of the chapel building. The main chapel entrance is set back from the western elevation with an existing memorial garden located to the south.

Several mature trees are found within and around the site, none of which are subject to individual tree preservation orders however are protected through the Conservation Area status.

St George's RAF Chapel was originally constructed in 1951 as a permanent war memorial for those who lost their lives serving within Biggin Hill Sector during WWII. Gate guardians are placed on either side of the entrance in the form of a Spitfire and Hurricane aircraft.

Proposal

It is proposed to develop a new memorial museum, café and visitors shop at the Chapel site. The development is to be single storey in height with the predominant built form to be sited to the northern elevation following the ridge line of the building to enclose the eastern and southern boundary of the site to create a walled memorial and contemplation garden, framing the Chapel when viewed from the highway.

The design of the memorial museum can be described as contemporary with the primary entrance to the museum being directly from the car parking area to the north which would enable the chapel to be accessed separately, if needed, for services etc.

Minor alterations are also proposed to the internal layout of the Chapel itself inclusive of the change of use of the rear most room within the Chapel to be used as exhibition space when necessary.

The application also proposes a new access to the site to the north close to the Cadets building which will feed into the car park area to the north.

Consultations

Nearby owners/occupiers were notified of the application and the following representations were received:

Letters of objection:

- The proposed plans are not in character with the chapel itself
- Cannot understand the need for it to be bordered on both sides by high straight walls and find it hard to believe it enhances the conservation area
- Believe Michael Fallon in 2015 when giving the site to Bromley Council wanted the chapel to be kept in its original state
- No part of the chapel space should be converted. The chapel is a place of worship and reflection
- Concerned about the heights of the walls around the remembrance rose garden. Roses need light to thrive.
- It will be sad if the hedges to the front of the chapel are to be removed
- What impact will a museum, so close to the garden of remembrance where ashes are interred, have on the tranquillity of the area?
- The design of the building is ugly
- The change of use of the chapel space is an insult to the people who gave their lives in the war, it will lose its purpose as a memorial.
- The extensive commitment by BHBoBSC (Biggin Hill Battle of Britain Supporters Club) has prima facie been comprehensively ignored in the plans submitted by Robin Lee Architecture representing the Biggin Hill Memorial Museum Trust. As a nearby resident for the past 34 years I consider this wasteful of all the efforts, both time and financial by devoted locals. This action comprehensively ignores policies LBB articulate within the 'Building a Better Bromley - Listening to you'.
- The Biggin Hill Memorial Museum Trust Design has it seems not thoroughly considered the side effects on what people value about the existing Chapel.
- The replacement proposed has no architectural merit in comparison, is stark and lacks any semblance of association with what it endeavours to represent.
- Part change of use of the St George's Room from Class D1 (Place of Worship) to Class D2 (Assembly and Leisure) ignores the fact that during busy periods this room is a valued overflow area to the main Chapel. This change of use is inappropriate.
- The proposed building materials and finish are incongruous. They add nothing to the appearance of the area and are in complete contrast to the adjacent listed buildings.

- It is proposed by this application that more than 25 trees be removed to allow for this new application. This is unacceptable in a Conservation Area and ignores the advice local residents must follow in similar conservation
- The building height at 9' is insufficient for the display in particular of the significant artefact known as The Battle of Britain Lace Panel at 15' in length and 5' in width.

Letters of Support:

- The development is entirely appropriate and retains the historic link with RAF Biggin Hill
- We need to preserve our heritage and tell the brave story of Biggin Hill and fully support this great project
- As a local business owner I would welcome the added visitors that a heritage centre would bring
- This project can only bring a place of interest, local knowledge and pleasure not only to the residents of Biggin Hill but to anybody that has an interest in WWII
- This development is long overdue and will preserve Biggin Hill's long association with the RAF and its role in the Battle of Britain
- The development will not impinge on traffic flow and adequate parking will be provided
- This is an opportunity for local people and volunteers to get involved in
- The design of the memorial acts like a frame that showcases the chapel rather than trying to be an extension. It fully utilises the available land without dominating the existing buildings nor does it encroach onto land for parking
- The inner courtyard and garden of remembrance will be enhanced creating a peaceful area for reflection.
- The development will add long term viability to the chapel
- As a retired priest who has taken many services at the chapel, I believe that the proposals will benefit the chapel and that the whole museum project will benefit from the enhanced facilities
- It will be lovely to see the site used more widely
- The proposals to extend and improve the facilities are very sympathetic and are supported wholeheartedly
- Excellent proposal and a splendid memorial for the site. The exhibition is a great showpiece for Biggin Hill and its contribution to WWII.

Consultees

Highways - Main Road is a classified road, a London Distributor Route and part of the A233. The site has a low (2) PTAL rating.

Although the latest information refers to a new vehicle entrance, the existing Air Cadets site gate will be used to access the site. The site access in front of the chapel would be used for special events and for large vehicles such as refuse vehicles. A Stage 1 Road Safety Audit was carried out on the access arrangements, parking layout and coach parking. The majority of the issues were regarding the parking layout which was subsequently amended.

The gates at the site entrance are shown opening outwards over the highway. This is an offence under s153 of the Highways Act 1980 and so would not be acceptable. A revised plan has been submitted to rectify this which was found to be acceptable.

Parking

There are 27 parking spaces provided. The Transport Statement gives an estimate of the likely parking demand based on 25,000 visitors a year. In estimating the peak demand (a weekend in August) there are various assumptions made regarding the trips per peak month (14% of annual total), trips per peak day (25% or 35%), car mode (70% or 80%) and car occupancy (2 or 2.5 people). This gives a range of 55 - 95 vehicles per day. Further assumptions are made about the arrival profile (relatively steady between 10am - 4pm) and average duration of stay (90mins).

This gives a maximum parking demand at one time of 15 - 16 cars for the lower demand scenario and 26 - 27 cars for the higher demand scenario. In addition to this there is staff parking which is given at 4 - 5 cars.

Given this is a one off attraction there are no trip generation figures that can be used and the TS indicates these figures were based on a market appraisal and discussions with Museum team. I have no information that would disagree with these figures although there are a number of assumptions involved in arriving at them. However, the top end of the estimate is in excess of the number of parking spaces provided.

The main issue from a highways viewpoint is parking provision given the unknowns in the demand estimate. The application indicates that there is a flexible arrangement with the adjacent Air Cadet's site for overspill parking when demand exceeds the number of spaces. There is no plan of the overspill spaces so I am not sure which ones are being referred to and how this is going to be realised in practice.

The access from the gates to the parking area is only wide enough for one-way working and on busy days this has the potential to cause vehicles to queue. They should not queue back to Main Road and so there may need to be management of the in & out movements. In order to cover this and the issue of the overspill spaces it is suggested a Car Park Management Plan is submitted.

The café and shop will be able to be accessed without charge. It is assumed they will be used as ancillary to the Museum and not advertised in their own right and so not attract any additional trips.

It is proposed to use the layby outside the site for coach parking. The demand scenario shows one coach trip per week which should not be an issue.

Servicing

The swept path for refuse vehicle is shown using the main gate in front of the chapel to enter and leave the site.

No objections are raised to the scheme subject to conditions.

Drainage - We accept in principle the applicant's statement in section 11.8 of the Design & Access Statement Report to discharge surface water to the ground via a soakaway. No objections subject to conditions

Trees - The historic permission associated with the site is noted which involved the removal of protected trees adjacent to the chapel. This application is similar in terms of tree impact and it would not be reasonable to recommend refusal on tree grounds, considering the past decision.

The application has outlined a general landscape design and indicates trees to be removed/retained. Permission is achievable on the basis of tree protection details being

confirmed and a landscape plan being submitted. Landscaping is expected to include the specification of new tree planting and species should reflect the use of the land to guarantee long term success. No objections are made subject to conditions.

Environmental Health - No objections are raised.

Conservation Officer - St Georges RAF Chapel is a Grade II statutory listed building built in 1951 in memory of the 453 airmen killed in the Biggin Hill Sector during WW2. Its significance is accurately described in the submitted Heritage Statement. It also lies within the RAF Biggin Hill Conservation Area as part of West Camp.

The proposed external changes comprise demolition of an annex built in the 1990s, although the link which contains a stained glass panel by Aircraft Association remains. The annex has no particular significance other than being a sympathetic design for its time. The proposed replacement buff brick and bronze window building would wrap around the original chapel. I believe the design has been expertly handled by the architects and would not overwhelm the host nor detract in any way from the CA. The design itself is contemporary design but highly restrained and respectful at the same time.

Internally the building is to remain as is with the exception of some new folding doors between the nave and the St Georges room. Otherwise the proposed works, as documented in the conservation report, are largely like for like repair of existing fabric to secure its future.

In conclusion, the proposal has very strong public benefits insofar as it secures the future of the chapel building, and better reveals the heritage of Biggin Hill through the heritage centre element.

No objections are made subject to conditions.

APCA - No Objections

Metropolitan Police - The cycle stands or racks should be secured into concrete foundations, and should enable cyclists to use at least two locking points so that the wheels and crossbar are locked to the stand rather than just the crossbar.

All lighting should be to the required British Standards and local council requirements, avoiding the various forms of light pollution (vertical and horizontal glare). The lighting should be as sustainable as possible with good uniformity.

Any landscaping should allow opportunity for natural surveillance by shrubs being selected to have a mature growth height no higher than 1 metre, and trees should have no foliage, or lower branches below 2 metres thereby allowing a 1 metre clear field of vision.

CCTV and an alarm system would be beneficial for this proposal.

If not already consulted the applicants should view The Arts Council England Collections Trust series of practical guides for security in museums and galleries

Historic England - A detailed pre-application advice response which is referenced in the Design and Access Statement that accompanies this application was provided. The sensitive approach adopted by the development team is welcomed and no further comments are offered at this stage. Historic England have assessed the application in accordance with the Arrangements for Handling Heritage Applications Direction 2015 and do not consider that it requires the authorisation of the Secretary of State on this occasion.

Historic England (Archaeology) - No objections subject to conditions.

Town Centre Renewal - A masterplan proposing development options for the adjoining West Camp site is being prepared by the Renewal team with the objectives of exploring opportunities for the adaptive reuse of existing heritage buildings and the potential use of land for an aviation academy to support the airport. The Renewal team have no objections and are generally supportive of the proposals as they are consistent with those in the developing masterplan and will add to the vibrancy to the area. It is noted as positive, that the proposed scheme seeks to preserve the historic character of area, whilst introducing contemporary design which complements the existing setting of the overall site.

Biggin Hill Airport have been consulted however no formal response has been received. A letter from the Estate Manager however has been supplied as a supporting document with the application in which it states that the airport are supportive of the scheme.

Planning Considerations

In determining planning applications, the starting point is the development plan and any other material considerations that are relevant. The adopted development plan in this case includes the Bromley Unitary Development Plan (UDP) (2006) and the London Plan (2015). Relevant policies and guidance in the form of the National Planning Policy Framework (NPPF), National Planning Policy Guidance (NPPG) as well as other guidance and relevant legislation, must also be taken into account.

Unitary Development Plan

The application falls to be determined in accordance with the following policies:

- T1 Transport Demand
- T2 Assessment of Transport Effects
- T3 Parking
- T5 Access for people with restricted mobility
- T7 Cyclists
- T6 Pedestrians
- T7 Cyclists
- T9 Public transport
- T18 Road safety
- BE1 Design of New Developments
- BE8 Statutory Listed Buildings
- BE11 Conservation Areas
- BE4 Public Realm
- NE3 Nature conservation and development
- NE7 Development and Trees
- G1 Green Belt
- L9 Indoor recreation and leisure
- C1 Community Facilities
- C2 Community facilities and development
- BH1 Local Environment
- BH2 New Development
- BH4 Passenger Terminal. Control Tower, West Camp (Area 1)

Emerging Bromley Local Plan

The Council is preparing a Local Plan and commenced a period of consultation on its proposed submission draft of the Local Plan on November 14th 2016 which closes on December 31st 2016 (under The Town and Country Planning (Local Planning) (England) Regulations 2012 as amended). An updated Local Development Scheme was submitted to Development Control Committee on November 24th 2016 and Executive Committee on November 30th 2016, indicating the submission of the draft Local Plan to the Secretary of State in the early part of 2017. The weight attached to the draft policies increases as the Local Plan process advances.

The most relevant draft Local Plan policies include:

- Draft Policy 1 - Housing Supply
- Draft Policy 4 - Housing Design
- Draft Policy 8 - Side Space
- Draft Policy 20 - Community facilities
- Draft Policy 21 - Opportunities for Community Facilities
- Draft Policy 30 - Parking
- Draft Policy 31 - Relieving Congestion
- Draft Policy 32 - Highways Safety
- Draft Policy 33 - Access for All
- Draft Policy 37 - General Design of Development
- Draft Policy 41 - Conservation Areas
- Draft Policy 43 - Trees In Conservation Areas
- Draft policy 49 - The Green Belt
- Draft Policy 73 - Development and Trees
- Draft Policy 103 - Biggin Hill SOLDC
- Draft Policy 105 - West Camp
- Draft Policy 116 - Sustainable Urban Drainage Systems (SUDS)
- Draft Policy 123 - Sustainable Design and Construction

It is proposed within the emerging Local Plan to remove the pre-application site from the Green Belt.

London Plan 2015

In strategic terms the most relevant policies include:

- 3.16 Protection and enhancement of social infrastructure
- 4.6 Support for and enhancement of arts, social, culture, sport and entertainment provision
- 5.12 Flood Risk Management
- 5.13 Sustainable Drainage
- 5.14 Water Quality and Wastewater Infrastructure
- 6.3 Assessing the Effects of Development on Transport Capacity
- 6.9 Cycling
- 6.10 Walking
- 6.13 Parking
- 7.1 Lifetime Neighbourhood
- 7.2 An inclusive environment
- 7.3 Designing out Crime
- 7.4 Local Character
- 7.8 Heritage Assets and Archaeology
- 7.15 Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes
- 7.16 Green Belts
- 7.19 Biodiversity and access to nature

7.21 Trees and woodlands
8.1 General design of development
8.7 Nature and trees
10.4 Sustainable Urban Drainage Systems
10.10 Sustainable design and construction

National Planning Policy Framework 2012 (NPPF) is relevant, including the following paragraphs:

Paragraph 19 of the NPPF states that 'significant weight should be placed on the need to support economic growth through the planning system'.

Paragraph 26 relates to the need for an impact assessment for leisure development that is outside a town centre. This scheme would fall below the threshold for an impact assessment to be required.

Paragraphs 87-89 relate to development in the Green Belt and state that 'As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.'

Paragraphs 132 relate to heritage assets and states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.

Table 2.1 of the London Plan identified Biggin Hill as a potential SOLDC (Strategic Outer London Development Centre). Biggin Hill is described as having strategic functions of greater than sub-regional importance under the category of 'other transport related functions'.

Planning History

St George's RAF Chapel Applications:

The chapel was constructed in 1951 when Biggin Hill was an operational RAF base therefore planning permission would not have been required for its construction.

89/02665/OTH - Single storey side extension to the chapel - Permitted

92/01756/OTH - Erection of a perimeter fence, change of use of Roman Catholic Chapel and bedding store to parade hall and classroom/mess hall respectively and erection of a single storey covered walkway - Permitted

96/01286/OTH - Installation of a flagpole - Permitted

The Chapel was listed in 2005 along with the other original RAF buildings in West Camp.

Heritage Centre Application:

02/02371/FULL3 - Conversion of former military transport garage to create a heritage centre with associated parking - Permitted

04/02334/OUT - Demolition of existing dwellings at 2, 4, 6 & 8 Main Road and 37, 38, 39 & 40 Vincent Square; erection of building for use as Heritage Centre with associated car and coach parking and associated landscaping and upgrading of existing access. OUTLINE

(Land at Former RAF Married Quarters & Nos. 2, 4, 6 & 8, Main Road, Biggin Hill) - Permitted

09/00578/FULL1 - Two storey detached building to provide Heritage Centre including associated access, parking and landscaping - Permitted

14/02136/FULL1 - Construction of a museum with integral cafeteria, display areas, lavatories and relocation of existing car park on land adjacent to the Chapel - Permitted

Conclusions

The main issues relating to the application are whether the building constitutes inappropriate development in the Green Belt, and its impact on the character and appearance of open countryside and on the amenities of the occupants of surrounding residential properties and setting of the neighbouring listed building.

Principle of Development

Paragraph 79 in the NPPF sets the tone for Green Belt policy. It states that the essential characteristics of Green Belts are their openness and permanence and that the fundamental aim of Green Belt policy is to keep land permanently open. This fundamental aim is also inherent in paragraphs 89 and 90 in the NPPF.

In addition London Plan Policy 7.16 'Green Belt' notes that "the strongest protection should be given to London's Green Belt, in accordance with national guidance. Inappropriate development should be refused, except in very special circumstances. Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt as set out in national guidance."

As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances (Para.87, NPPF).

When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations (Para.88).

As the site is situated within the Green Belt, the objectives and policies within Chapter 8 Green Belt and Open Space of the Unitary Development Plan (UDP) are relevant to the proposed development.

The relevant Objectives are:

1. To protect the Green Belt from inappropriate development, encourage greater access and promote its use for outdoor recreation.
2. To enhance land designated as Green Belt through active management and advice.

Policy G1 provides direction for all development occurring within the Green Belt. This Policy largely accords with Planning Practice Guidance 2 (PPG2), which has been superseded by the NPPF. The NPPF describes two principal steps: firstly, determining whether the proposal constitutes "inappropriate development" (as defined by both instruments) and, if it does constitute "inappropriate development", whether it demonstrates "very special circumstances" clearly outweighing any harm to the Green Belt.

The site is currently situated within the Green Belt but would be excluded through boundary amendments proposed under the Draft Local Plan. The Applicant considers that the development could be considered 'limited infilling' as a result of the minor increase in floor space and proximity of the new build to the existing Chapel, and as such can be considered appropriate development within the Green Belt as per paragraph 89 and 90 of the NPPF. Bullet point 6 of Para.89 of the NPPF states: A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are...limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development

Officers however do not agree with this as whilst the development is sited in close proximity to the Chapel itself, it proposes an increase in floor space of 489sqm within an open and spacious site and is sited adjacent to a surface car park with the nearest building located over 40m directly to the north and a building airside approximately 25m to the north-east. Further to this, the extent in which the visitor numbers to the site will be increased as a result of the application by both vehicular and pedestrian movements, result in a form of development which will cause a substantial impact over the open Green Belt site. The use of a site and the resulting visual impact, inclusive of movements to and from the site, is implicitly part of the concept of openness therefore Officers cannot agree that the development is either limited infilling or that the development would have no greater impact on the openness of the Green Belt. Given the siting of the development and the overall increase in floor space and associated vehicular and pedestrian movements, the proposal falls within the definition of "inappropriate development" and would not meet any of the exceptions set out in paragraphs 89 and 90 of the NPPF. Therefore, there must be other considerations that clearly outweigh the harm by reasons of inappropriateness and other harm resulting in "very special circumstances".

The Applicant has put forward a case for very special circumstances which can be split into three main points as follows:

Cultural and Heritage Significance

The Applicant states that St George's Chapel was built as a permanent shrine of remembrance to the 453 airmen who died within the Biggin Hill sector during the Battle of Britain. Given the immense importance of the Battle of Britain in the country's history, the pivotal role in which Biggin Hill played in that battle and the sacrifice it commemorates, its significance both in cultural and historic buildings terms is assessed as being of the highest order. The Applicant goes on to state that a memorial museum to complement the chapel can only be sited within close proximity if a strong and meaningful link is to be maintained between them; there is no other location more suitable for the memorial museum than adjacent to the memorial chapel, on the airfield from which the airmen flew and lived before their deaths.

Officers consider that the provision of a museum on the site of the chapel can be afforded significant weight when assessing very special circumstances. As Members will be aware, there have been previous proposals (and a planning permission) to provide a heritage centre around the historic environs of Biggin Hill Airport, although the size and siting of those earlier schemes have varied in relation to this proposal. The proposal is considered to be appropriate in view of its immediate connection with the activities of the airfield, the RAF Chapel and connection with the local communities and relatives of those who served the RAF during the Second World War. Officers agree that there is no other more appropriate place for the memorial museum than on the site of the Chapel.

Previously Approved Scheme

On 25th July 2014 planning permission was granted for the construction of a museum with integral café, shop, display areas and lavatories on a site adjoining the current application site. The permission remains extant. The extant permission confirms that matters such as principle of development, impact on the Green Belt and very special circumstances are all resolved in favour of the construction of a new museum. In floor space terms, the proposed museum is 38% smaller than that previously granted permission with a reduction in floor space from 792sqm to 489.24sqm.

Officers acknowledge that the fall-back position of the Applicant is to construct a museum on land adjacent to the car park as permitted under application ref: 14/02136/FULL1. As previously stated, this development has an increased floor area over that proposed and is of a design which is wider, taller and more prominent than that proposed within this application. Furthermore, the extant museum is to be sited on land currently used as the surface car parking to the Chapel, therefore developing on a greater site area with a far more detrimental impact upon openness than that as proposed in this case. Officers consider that the two developments cannot be developed out concurrently given that the site of the 2014 permission is located within the parking area of this current application, which will be required to be retained and maintained in perpetuity as a condition of any grant of planning permission. Officers consider that given the planning history and the extant permission, that this should be afforded significant weight in the Green Belt balance.

Development Plan Policy

As well as being within the Green Belt, the site is a MDS and is specifically within an area where development can be considered subject to criteria set out in Policy BH4. Although Policy BH4 refers to the restriction of development to airport related uses, it does state at paragraph (i) that development should form part of a comprehensively planned development for the site and the provision of a heritage centre is stated as an aim of Chapter 12. Policy BH4 also goes on to state that proposals for other land uses in West Camp will be considered only where it can be demonstrated that a lack of demand for airport-related uses would lead to a long term vacancy of the buildings, or where the use would contribute to the conservation and historic interest of the area.

The museum is proposed to commemorate the story and history surrounding the chapel, Biggin Hill airfield and Biggin Hill in relation to the Battle of Britain. Its purpose is to contribute to the conservation and historic interest of the area as per policy BE4. It is considered that the provision of a memorial museum/heritage centre is established within local policy as an aim of Chapter 12 of the Unitary Development Plan and the use of the site for this purpose can be considered appropriate in this context.

Further to the very special circumstances raised by the Applicant, a Business Plan has been submitted in support of the application. In terms of the financial viability of the scheme, it is noted that the Airport and adjoining business area are a major asset to the Borough and are direct and indirect generators of employment. The assessment of financial viability is considered to be adequate to justify this scheme in its own right, taking account of projected visitor numbers and revenue and the associations with surrounding heritage buildings i.e.: Chartwell.

With regard to any other harm, in terms of visual impact from the Green Belt, the Applicant has submitted a Visual Appraisal of the site in support. This report concludes that there are no large scale effects resulting from a total or major alteration of the view such that the baseline situation would be fundamentally changed. Viewpoint 3 which was taken from

40m north west of the site identified some small-medium scale effects however it is considered that the nature of the visual effects are such that the development will not result in a total or major alteration to the views available. On balance, Officers consider that the long ranging views of the proposed Memorial Museum are not detrimental to the openness of the site nor impact detrimentally upon the neighbouring Green Belt therefore any actual harm is limited.

As such, whilst Officers consider that the development of a new Memorial Museum cannot be considered 'limited infilling' for the purposes of appropriate development within the Green Belt as stated within paragraph 89 of the NPPF, there are other considerations which when taken cumulatively could potentially outweigh the harm to the Green Belt by reason of inappropriateness and any other harm.

Design including impact on heritage assets

Design is a key consideration in the planning process. Good design is an important aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. The NPPF states that it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.

The NPPF requires Local Planning Authorities to undertake a design critique of planning proposals to ensure that developments would function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development. Proposals must establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit; optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks. Developments are required to respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation. New development must create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and are visually attractive as a result of good architecture and appropriate landscaping.

London Plan and UDP policies further reinforce the principles of the NPPF setting out a clear rationale for high quality design. UDP Policy BE1 sets out a list of criteria which proposals will be expected to meet, the criteria is clearly aligned with the principles of the NPPF as set out above.

Policy BE8 of the Council's UDP is concerned with the impact of a scheme upon statutory listed buildings. The policy states that applications for development involving a listed building or its setting, or for a change of use of a listed building, will be permitted provided that the character, appearance and special interest of the listed building are preserved and there is no harm to its setting.

Policy BE11 of the Council's UDP states that in order to preserve or enhance the character or appearance of conservation area, a proposal for new development for engineering works, alteration or extension to a building, or for a change of use of land or buildings within a conservation area will be expected to:

(i) respect of compliment the layout, scale, form and materials or existing buildings and spaces;

(ii) respect and incorporate in the design, existing landscape or other features and contribute to the character, appearance or historic value of an area; and

(iii) ensure that the level of activity, traffic, parking services or noise generated by the proposal will not detract from the character or appearance of the area

The chapel is a Grade II statutory listed building and is within the RAF Biggin Hill Conservation Area. The listing of the building is described as follows: 'Memorial chapel to airmen lost whilst flying from Biggin Hill in WWII. Consecrated 1951, architect W Wylton Todd ARIBA. Red brickwork in Flemish bond, clay Roman tile roof on steel trusses'.

The proposal is for a single storey heritage centre to wrap around the side and rear of the chapel and to integrate the existing chapel through landscaped areas. The proposal would require the demolition of a northern wing which contains a boiler room and some utility areas. This element is not original to the Chapel and dates from the 1990s.

The proposed heritage centre is of an exemplary, sympathetic design and modest in height and appearance so as not to compete with the chapel itself but rather framing the listed building. The heights of the building are commensurate with the eaves height of the church which retains the importance of the listed building when viewed from surrounding areas and would not detract from the surrounding Conservation Area. It is considered that the museum would result in the preservation of the wider Conservation Area and its ultimate purpose of protecting the RAF buildings and historic association with Biggin Hill and would enhance the historic association of the CA in terms of increasing visitor and public knowledge of the site. Whilst the side and rear elevations of the chapel would be obscured there are currently few views of these sides available and therefore it is considered that the setting would be preserved, furthermore the landscaping enhancements would create attractive spaces in their own right.

The proposed external changes comprise demolition of an annex built in the 1990s, although the link which contains a stained glass panel by Aircraft Association remains. The Conservation Officer states that the annex has no particular significance other than being a sympathetic design for its time.

In terms of proposed materials, it is considered that the Applicant has put due consideration when allowing for the finishing materials of the scheme and Officers consider that the use of the lighter buff brick in the construction of the new building stands out against the Chapel, retaining the stand alone appearance of the Listed Building. The scheme will be constructed of Flemish Bond to match the Chapel which is considered acceptable. The windows are set within large deep reveals constructed from a bronze anodized aluminium which has a contemporary and high quality finish.

The proposed closing of the main entranceway and the re-location of the vehicular entrance to the north of the site does give some concern regarding the impact this would have on the significance of the Chapel itself. The Applicant states that the existing entrance and gates are to be retained on the site and used for Mass at the Chapel, pedestrians and special events and therefore will still be in some use. The partial use of this entrance is considered to protect the setting of the Chapel and prevent any impact from vehicular movements. This is also an approach that is supported by Historic England and Officers consider this to be appropriate on balance.

It is considered that the overall design of the proposal is respectful to the Listed Building and end purpose. Paragraph 134 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Officers consider that the public benefit of the museum would outweigh any potential impact upon the Listed Building as noted, and on balance Officers

consider the scheme to be appropriate. The Conservation Officer raises no objections to the scheme subject to conditions.

Café Provision

It is noted that a new café is proposed as an ancillary function to the museum. Extraction flue details have been provided and no objections have been made from the Council's Environmental Health Officer.

Impact on neighbouring amenity

Policy BE1 of the UDP seeks to protect existing residential occupiers from inappropriate development. Issues to consider are the impact of a development proposal upon neighbouring properties by way of overshadowing, loss of light, overbearing impact, overlooking, loss of privacy and general noise and disturbance.

The nearest neighbours to the site are the RAF Cadets School located 60m north of the site, The Officers Mess which is sited over 65m to the west and various airport buildings to the east. It is considered that the resultant built form would not adversely impact upon residential amenity in terms of appearing overbearing or creating any detrimental loss of privacy. The proposed works may also not impede on natural light provision to surrounding land uses.

It is not considered that the museum would result in such significant highways pressures to result in any adverse impact on residential amenity, further mitigated by the considerable distances between the site and the closest residential properties.

Highways

The NPPF recognises that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, safe and suitable access to the site can be achieved for all people. It should be demonstrated that improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. The NPPF clearly states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

London Plan and UDP Policies encourage sustainable transport modes whilst recognising the need for appropriate parking provision. Car parking standards within the UDP should be used as a basis for assessment.

Main Road is a classified road, a London Distributor Route, and part of the A233. The site is within a low PTAL 2 area

The existing Air Cadets site gate will be used to access the site. The site access in front of the chapel would be used for special events and for large vehicles such as refuse vehicles. A Stage 1 Road Safety Audit was carried out on the access arrangements, parking layout and coach parking. Revised plans have been submitted to ensure that the gates to the site now open inwards, away from the highway which Officers find to be acceptable.

There are 27 parking spaces provided. The Transport Statement gives an estimate of the likely parking demand based on 25,000 visitors a year. Given this is a one off attraction there are no trip generation figures that can be used and the TS indicates these figures were based on a market appraisal and discussions with Museum team.

The main issue from a highways viewpoint is parking provision given the unknowns in the demand estimate. The application indicates that there is a flexible arrangement with the adjacent Air Cadet's site for overspill parking when demand exceeds the number of spaces. There is no plan of the overspill spaces so it is not certain which ones are being referred to and how this is going to be realised in practice. The access from the gates to the parking area is only wide enough for one-way working and on busy days this has the potential to cause vehicles to queue. They should not queue back to Main Road and so there may need to be management of the in & out movements. In order to cover this and the issue of the overspill spaces it is suggested a Car Park Management Plan is submitted.

The café and shop will be able to be accessed without charge. It is assumed they will be used as ancillary to the Museum and not advertised in their own right and so not attract any additional trips. Officers consider that this can be adequately controlled by condition.

It is proposed to use the layby outside the site for coach parking. The demand scenario shows one coach trip per week which should not be an issue.

No objections are made by the Highways Officer subject to the required conditions being imposed.

Drainage

The NPPF requires Local Planning Authorities to adopt proactive strategies to mitigate and adapt to climate change. London Plan and Draft Local Plan Policies advocate the need for sustainable development. All new development should address climate change and reduce carbon emissions.

Development may increase surface water flood risk by increasing impermeable surface area and thus runoff volume which existing drainage systems are unable to cope with. In such cases mitigation measures will be required. Policy 5.13 of the London Plan requires developments to utilise sustainable urban drainage systems (SUDS), unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water is managed as close to its source as possible in line with the hierarchy in policy 5.13. Whilst the site is not located within a flood zone, a scheme for the disposal of surface water run-off should be submitted if a planning application was to be forthcoming.

No objections are raised from the Drainage Officer who considers the use of soakaways appropriate for the site.

Ecology and Trees

The planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, geological conservation interests and soils; minimising impacts on biodiversity and providing net gains in biodiversity where possible. The NPPF addresses ecology in paragraph 109 which states, the planning system should aim to conserve and enhance the natural and local environment by 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. Paragraph 118 of the NPPF also states that opportunities to incorporate biodiversity in and around developments should be encouraged. UDP Policies NE3 and NE4 seeks to protect wildlife features and protected species requiring development proposals to incorporate appropriate mitigation where damage may occur.

It is noted within the submitted tree survey that 26 of the surveyed trees (including two Class A Lime trees) are to be removed and 19 to be retained. Policy NE7 requires proposals for new development to take particular account of existing trees on the site and on adjoining land. The historic permission associated with the site is noted which involved the removal of protected trees adjacent to the chapel. This application is similar in terms of tree impact and it would not be reasonable to recommend refusal on tree grounds, considering the fall-back position of the Applicant.

The application has outlined a general landscape design and indicates trees to be removed/retained. Permission is achievable on the basis of tree protection details being confirmed and a landscape plan being submitted. Landscaping is expected to include the specification of new tree planting and species should reflect the use of the land to guarantee long term success. No objections are made subject to conditions.

With regard to bio-diversity, a bat survey has been submitted to accompany the application. An initial survey was carried out on 18th May 2016 with further surveys (dusk emergence and dawn re-entry) were undertaken on 31st July 2016 and 1st August 2016. No bats were recorded emerging from the building at dusk, and no bats were recorded re-entering the building at dawn. Based on the results of the surveys, it is considered highly unlikely that the building is used by roosting bats. There are opportunities however to incorporate bat and bird nesting features and it is considered appropriate given the location of the development site to condition the implementation of biodiversity enhancement measures throughout the scheme.

The report also considered the impact of the development upon roosting birds and found that no bird nests were identified on or within the building, although the vegetation within the grounds is suitable for use by nesting birds. It is recommended that any vegetation clearance required should be undertaken outside of the bird nesting period or following a survey to confirm the absence of nesting birds. These requirements can be conditioned should Members be minded to grant permission.

Conclusion

The proposed development has been assessed against section 9 of the NPPF 'Protecting Green Belt Land'. The construction of new buildings in the Green Belt is regarded as inappropriate with specific exceptions. As the proposal does not comply with the relevant exceptions in Section 9 it is therefore considered to represent inappropriate development in the Green Belt. Inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstances. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations, substantial weight should be given to any harm to the Green Belt. With regard to other considerations, Very Special circumstances have been considered which include the extant permission for a museum on the site, the benefits to the provision of a museum within this location inclusive of securing the future for the Chapel and the local policy requirements for a development of this type. It is considered that as the result of the overall balance, the other considerations clearly and demonstrably outweigh the harm to the Green Belt and any other harm resulting in Very Special Circumstances and the principle of the development is considered acceptable.

The design of the museum is of a high quality and is respectful to its purpose and integrated Grade II Listed Chapel. Subject to conditions requiring the submission of materials, Officers are supportive of the proposal in this regard.

In terms of highways impact, subject to further details being secured by condition with regard to the overspill parking capacity and car park management, no objections are raised from a highways perspective. .

In conclusion, the development is considered appropriate within its context and Officers are supportive of the scheme and recommend that planning permission be granted.

RECOMMENDATION: PERMISSION

Subject to the following conditions:

- 1 The development to which this permission relates must be begun not later than the expiration of 3 years, beginning with the date of this decision notice.**

Reason: Section 91, Town and Country Planning Act 1990.

- 2 The development hereby permitted shall not be carried out otherwise than in complete accordance with the plans approved under this planning permission unless previously agreed in writing by the Local Planning Authority.**

The development to which this permission relates must be begun not later than the expiration of 3 years, beginning with the date of this decision notice.

- 3 Sample panels of facing brickwork showing the proposed colour, texture, facebond and pointing shall be provided on site and approved in writing by the Local Planning Authority before any work is commenced and the sample panels shall be retained on site until the work is completed. The facing brickwork of the development hereby permitted shall be carried out in accordance with the details of the approved sample panels.**

Reason: In order to comply with Policy BE1 of the Unitary Development Plan and in the interest of the appearance of the building and the visual amenities of the area

- 4 Details of the windows (including rooflights and dormers where appropriate) including their materials, method of opening and drawings showing sections through mullions, transoms and glazing bars and sills, arches, lintels and reveals (including dimension of any recess) shall be submitted to and approved in writing by the Local Planning Authority before any work is commenced. The windows shall be installed in accordance with the approved details.**

Reason: In order to comply with Policy BE1 of the Unitary Development Plan and in the interest of the appearance of the building and the visual amenities of the area.

- 5 Before any work is undertaken in pursuance of the consent, details shall be submitted to and approved in writing by the Local Planning Authority of**

such steps to be taken and such works to be carried out as shall, during the progress of works permitted by this consent, secure the safety and stability of that part of the building which is to be retained. The approved steps to secure the safety and stability of the retained building shall be in place for the full duration of the building works hereby granted consent.

Reason: In order to comply with Policy BE8 of the Unitary Development Plan and to protect the fabric of the Listed Building.

- 6** Details of a scheme of landscaping, which shall include the materials of paved areas and other hard surfaces, shall be submitted to and approved in writing by the Local Planning Authority before the commencement of the development hereby permitted. The approved scheme shall be implemented in the first planting season following the first occupation of the buildings or the substantial completion of the development, whichever is the sooner. Any trees or plants which within a period of 5 years from the substantial completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species to those originally planted.

Reason: In order to comply with Policy BE1 of the Unitary Development Plan and to secure a visually satisfactory setting for the development.

- 7** Before the development hereby permitted is commenced, details of the specification and position of fencing (and any other measures to be taken) for the protection of any retained tree shall be submitted to and approved in writing by the Local Planning Authority. The areas enclosed by fencing shall not be used for any purpose and no structures, machinery, equipment, materials or spoil shall be stored or positioned within these areas. Such fencing shall be retained during the course of building work

Reason: In order to comply with Policies NE7 and NE8 of the Unitary Development Plan to ensure works are carried out according to good arboricultural practice and in the interest of the health and visual amenity value of trees to be retained.

- 8** The development hereby permitted shall be carried out in complete accordance with the recommendations outlined in the Bat Survey document accompanying the application inclusive of the provision of biodiversity enhancement measures in the way of bat and bird boxes. Any deviation from these recommendations shall be submitted to and approved in writing by the Local Planning Authority prior to works commencing.

In order to comply with Policy NE5 of the Unitary Development Plan and in the interest of any protected species present at the site.

- 9** The premises shall be used as a Memorial Museum and Chapel only (Use Class D1) with accompanying ancillary cafe use (Use Class A3) and for no other purpose (including any other purpose in f the Schedule to the Town and Country Planning (Use Classes) Order 1987 or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification). There shall be no change of use permitted by the Town and Country Planning (General Permitted Development) Order or any subsequent variation thereof.

Reason: To enable the Council to reconsider the situation in the event of a change of user in the interest of the amenities of the area and Policy BH4 of the Unitary Development Plan

10 The Memorial Museum and ancillary Cafe use hereby permitted will not open outside the hours of 10:00 - 17:00 Monday to Sunday

Reason: In order to comply with policy S9 of the Unitary Development Plan and in order to protect neighbouring residential amenity.

11 Before any part of the development hereby permitted is first occupied boundary enclosures of a height and type to be approved in writing by the Local Planning Authority shall be erected in such positions along the boundaries of the site(s) as shall be approved and shall be permanently retained thereafter.

Reason: In order to comply with Policy BE1 of the Unitary Development Plan and in the interest of visual amenity and the amenities of adjacent properties.

12 Details of a scheme of landscaping, which shall include the materials of paved areas and other hard surfaces, shall be submitted to and approved in writing by the Local Planning Authority before the commencement of the development hereby permitted. The approved scheme shall be implemented in the first planting season following the first occupation of the buildings or the substantial completion of the development, whichever is the sooner. Any trees or plants which within a period of 5 years from the substantial completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species to those originally planted.

Reason: In order to comply with Policy BE1 of the Unitary Development Plan and to secure a visually satisfactory setting for the development.

13 The development permitted by this planning permission shall not commence until a surface water drainage scheme for the site based on sustainable drainage principles, and an assessment of the hydrological and hydro geological context of the development has been submitted to, and approved by, the Local Planning Authority. The surface water drainage strategy should seek to implement a SUDS hierarchy that achieves reductions in surface water run-off rates to Greenfield rates in line with the Preferred Standard of the Mayor's London Plan.

Reason: To reduce the impact of flooding both to and from the proposed development and third parties

14 Before commencement of the use of the land or building hereby permitted parking spaces and/or garages and turning space shall be completed in accordance with the approved details and thereafter shall be kept available for such use and no permitted development whether permitted by the Town and Country Planning (General Permitted Development) Order (England) 2015 (or any Order amending, revoking and re-enacting this Order) or not shall be carried out on the land or garages indicated or in

such a position as to preclude vehicular access to the said land or garages.

Reason: In order to comply with Policy T3 of the Unitary Development Plan and to avoid development without adequate parking or garage provision, which is likely to lead to parking inconvenient to other road users and would be detrimental to amenities and prejudicial to road safety.

15 Parking bays shall measure 2.4m x 5m and there shall be a clear space of 6m in front of each space (or 7.5m if garages are provided) to allow for manoeuvring and these spaces shall be permanently retained as such thereafter.

Reason: In order to comply with Appendix II of the Unitary Development Plan and to the interest of pedestrian and vehicular safety.

16 Before any part of the development hereby permitted is first occupied, bicycle parking (including covered storage facilities where appropriate) shall be provided at the site in accordance with details to be submitted to and approved in writing by the Local Planning Authority, and the bicycle parking/storage facilities shall be permanently retained thereafter.

Reason: In order to comply with Policy T7 of the Unitary Development Plan and Policy 6.9 of the London Plan and in order to provide adequate bicycle parking facilities at the site in the interest of reducing reliance on private car transport.

17 Whilst the development hereby permitted is being carried out, provision shall be made to accommodate operatives and construction vehicles off-loading, parking and turning within the site in accordance with details to be submitted to and approved in writing by the Local Planning Authority and such provision shall remain available for such uses to the satisfaction of the Local Planning Authority throughout the course of development.

Reason: In the interests of pedestrian and vehicular safety and the amenities of the area and to accord with Policy T18 of the Unitary Development Plan.

18 Details of a scheme for the management of the car park shall be submitted to and approved in writing by the Local Planning Authority before any part of the development is first occupied and the car park shall be operated in accordance with the approved scheme at all times unless previously agreed in writing by the Authority.

Reason: In order to comply with Policy T3 of the Unitary Development Plan and to avoid development without adequate parking or garage provision, which is likely to lead to parking inconvenient to other road users and would be detrimental to amenities and prejudicial to road safety.

19 No demolition or development below ground level shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development below ground level shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and

a) The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works

b) The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI

Reason: In compliance with Policy 7.8 of the London Plan and for the protection of archaeological remains of significance.

20 The cafe and shop shall only be used ancillary to the museum and shall not operate or be advertised in its own right.

Reason: In order to comply with Policy T3 of the Unitary Development Plan and to avoid development without adequate parking, which is likely to lead to parking inconvenient to other road users and would be detrimental to amenities and prejudicial to road safety.

You are further informed that :

- 1 The written scheme of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

It is envisaged that the archaeological fieldwork would comprise the following:

Watching Brief

A watching brief involves the proactive engagement with the development groundworks to permit investigation and recording of features of archaeological interest which are revealed. A suitable working method with contingency arrangements for significant discoveries will need to be agreed. The outcome will be a report and archive.

It is recommended that the watching brief should be undertaken during any ground disturbance, topsoil, stripping, demolition works and subsequent foundation construction, with adequate time given to investigate and record any archaeological remains found.

It should also be noted that if any ground disturbance takes place within the memorial garden, than exhumations from consecrated or other land subject to the Church of England's jurisdiction will need the Church's authorisation (a Faculty or the approval of a proposal under the Care of Cathedrals Measure 2011).