

Section '3' - Applications recommended for PERMISSION, APPROVAL or CONSENT

Application No : 17/05343/FULL1

Ward:
Biggin Hill

Address : Biggin Hill Airport Ltd Churchill Way
Biggin Hill TN16 3BN

OS Grid Ref: E: 541744 N: 160173

Applicant : Biggin Hill Airport

Objections : YES

Description of Development:

Hotel with 56 bedrooms, a restaurant (and associated kitchen/servicing areas), lounge, gymnasium and associated access road together with service area and car parking and a sub-station.

Key designations:

Biggin Hill Noise Contours
Biggin Hill Safeguarding Area
London City Airport Safeguarding
Open Space Deficiency
Smoke Control SCA 24
South Camp

Proposal

Planning permission is sought for a hotel with 56 bedrooms, a restaurant (and associated kitchen/servicing areas), lounge, gymnasium and associated access road together with service area and car parking and a sub-station.

The hotel is shown as a maximum of three storeys in height, and located on the north-eastern area of the site. The bedroom wing is located to the east of the building, furthest from the runway and the restaurant to the western end of the proposed building. The remainder of the site is shown as accommodating the parking, servicing and access road.

The ground floor accommodates back-of-house facilities, a double height atrium space comprising a reception/lobby area, and 18 bedrooms (including six accessible rooms). The first floor includes the restaurant and lounge area, as well as gymnasium, and 19 bedrooms. The second floor features the same bedroom layout as the first floor (19 bedrooms) but changes in the area of the hospitality wing, which is two storeys tall, so becomes a flat roof at second floor level.

Access to the site is from Churchill Way, a secondary road off Main Road. A new vehicular access is provided, granting access to both the Lookout Café and the new hotel site, with a junction formed just inside the site's perimeter. The servicing of the building is from the north, in the area between the Bombardier hangar and the proposed hotel.

There are 42 parking spaces provided for the hotel, including 16 parking spaces for staff. New landscaping is shown, including grass and planting.

Permission was granted under reference 11/02816/EXTEND to extend the time limit for implementing permission (09/01194) which was granted on 14th August 2009 by the Development Control Committee. The proposal was for a hotel comprising 76 bedrooms with restaurant, viewing terrace, meeting/training rooms, administration area, gym/sauna, function room, pilot's lounge and associated facilities together with car parking and service area, and new access road.

The current application largely replicates these permissions, although the design of the proposal has been amended to take account of surrounding development which has been implemented since the previous considerations. In addition, the current proposal is for a reduced hotel provision of 56 bedrooms.

The application states that the core business objective of the proposed hotel is to support and sustain the existing customer base of the Airport and that the hotel aims to provide a facility for pilots, air crew and business passengers who currently have to travel a considerable distance from the Airport to reach hotels for overnight accommodation.

The submission advises that the proposal for a hotel has re-emerged in the context of Biggin Hill Airport experiencing a period of growth in the business and general aviation industry. As the Airport grows, the demand for convenient bedspace for users of London Biggin Hill Airport becomes increasingly acute. LBHA intends to build out the proposed hotel itself, rather than rely on an operator in the short term. As such, LBHA has a significant interest in ensuring that the hotel is appropriate in scale and deliverable. It is asserted that there is therefore a clear need for the hotel to be located on the application site; its location anywhere other than at the Airport would not allow it to serve this purpose.

The current application is accompanied by the following supporting documents:

- Design and Access Statement
- Air Quality Assessment
- Construction Logistics Management Plan
- Energy Strategy
- Land Contamination Information
- Lighting Assessment
- Market Assessment and Statement of Need
- Statement of Community Involvement
- Sustainability Statement
- Ventilation and Extract Statement
- Planning Statement
- Transport Assessment
- Noise Impact Assessment
- Flood Risk Assessment

These documents are available to view in full on the application file and have been referred to in the 'conclusions' section of the report where necessary.

Location and Key Constraints

The application site is located within the south western corner of the Airport within the designated 'South Camp' area, although it lies entirely outside the Green Belt. The nearest residential properties are at a lower level on the opposite side of the A233.

The site currently comprises hardstanding areas. There are two trees on the southern boundary of the site adjacent to the roundabout. To the north east of the application site is a hangar for Bombardier, which was constructed in 2009. To the north west of the application site is the 'Lookout Café'. Land to the north of the proposed hotel and west of the hangars is restricted due to aircraft safeguarding, meaning buildings can only be a certain height. Access to the site is via Churchill Way from the roundabout with Main Road (A233).

Comments from Local Residents and Groups

Nearby owners/occupiers were notified of the application and representations were received, which can be summarised as follows:

Objections

- Development cannot be supported by local services (e.g. roads) as they are already overwhelmed
- Design is a 'square box' which will not complement Biggin Hill
- No demand for a 56 bedroom hotel - hotels are already available in Croydon and Bromley (including new Travelodge under construction)
- Profile of visitors to Biggin Hill Airport mean that their preference is to travel into London which has more to offer
- Site should be developed to provide something for the community
- What provision has been made for overflow parking - 26 spaces are provided for visitors and there is no capacity on street
- Airport already has a café and viewing area which caters families and aviation enthusiasts

Support

- Fully support proposals
- No other such facilities in immediate vicinity of Airport
- Excellent use of disused land
- Hotel of great benefit reducing need to drive elsewhere and providing better rest on short stop overs
- Long overdue asset to the area
- Support growth of businesses locally
- Cut down on commuting times for employees at the airport
- Other facilities will benefit local businesses
- Would like the lookout café to be protected
- Will create employment (25 jobs)

- The current lack of hotels in the vicinity affects growth
- Provision for future basement should be included to provide greater flexibility and provide additional facilities such as a pool

Comments from Consultees

Environment Agency (summarised):

Consider that planning permission should only be granted to the proposed development as submitted if conditions are imposed relating to the control of pollution and groundwater, remediation of contaminated land, the prevention of piling and infiltration drainage techniques without prior written approval

Tree Officer (summarised):

There appears to be only a single tree on site, which is shown as retained on the proposals. We do not consider there to be an impact to retained trees on site, provided a condition requiring no storage under the retained tree canopy during construction. Biggin Hill Airport is, however, a prominent feature of Bromley and should be enhanced through high spec landscaping throughout the site. There appears to be ample opportunity for specimen tree planting west of the proposed hotel and planting to soften the parking areas and hard standing.

Environmental Health Pollution Officer:

Air Quality: I concur with the findings of the Air Quality Assessment prepared by Hoare Lea (05/10/2017 Rev 2) that the air quality impacts of the development will not be significant.

Noise: The Bickerdike Allen Partners report (A11128-R01A-NW) proposes noise criteria for fixed mechanical plant. Consequently I would suggest that a Condition be imposed to ensure that all fixed plant (when considered cumulatively) does not exceed these criteria.

Contaminated Land: I concur with the conclusions and recommendations of the Mason Navaro Pledge report (ref 17258, October 2017) and would suggest a modified standard condition be imposed

Lighting: I have seen the Hoare Lea Lighting Assessment and am satisfied that no residents will suffer loss of amenity as a result of the lighting scheme proposed.

Ventilation and extract system: I am satisfied with the approach proposed in the Hoare Lea statement that the kitchen extract system will be designed in accordance with the DEFRA (2005) criteria.

I would therefore recommend that the following Conditions be imposed:

1. Before the use commences details of all fixed plant shall be submitted to the LPA to confirm that the criteria of the Bickerdike Allen Partners LLP report ref A11128-R01A-NW have been met.

2. Standard Condition K09 (without part A)

3. Before the use commences details of the kitchen extract system shall be submitted to and approved by the LPA and shall be permanently maintained thereafter

Drainage Engineer:

Reviewing the submitted FRA carried out by STOMOR Civil Engineering Consultants with Ref No. ST2669/FRA-1710 Rev 2 Dated October 2017. I note the use of permeable paving, swales and two deep boreholes soakaways to store surface water run-off for all events including the 1 in 100 year plus 40% climate is acceptable in principle.

Condition: 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.

Highways:

The airport, including Churchill Way which is recorded as a private road, is owned by the Council and leased to the operators. The site has a low (1b) PTAL assessment. A Transport Statement was included with the application.

The parking standards for hotels in the UDP show up to one space per bedroom plus coach parking. There are 42 spaces shown with this application, 26 for guests and 16 for staff. Data from the last census indicates that 63% of local workers drive to work so that seems to be at the right level for staff parking as the application indicates there will be 24 staff. The other parking is provided at 0.46 spaces per bedroom. The previously approved 76 bed hotel had 92 car parking spaces. There is no function room with the current proposal.

The application indicates that the hotel is primarily aimed at pilots and crew who have flown into the airport and require accommodation overnight and during the day or are seeking overnight accommodation before an early morning flight out of the airport, private aircraft travellers seeking accommodation before an onward trip to London or customers doing business with companies located on the airport. This has then been used to justify the lower level of car parking proposed.

Coach parking is provided but in para 4.13 of the TS and para 5.62 of the Planning Statement it is stated that "The coach parking is not considered necessary for the working of this hotel, but is being provided to safeguard the interests of potential future operators."

I do not know what the potential demand is from the intended customer base but this would imply that there is the potential to make it into a more commercial concern with a wider clientele. Given the low PTAL, if that were to be the case the parking provision would need to be more towards one space per bedroom. The TS indicates (para 4.12) that if more parking is required then the spaces at the nearby café could be used. However, this parking seems to be well used, particularly in the summer months, so I am not sure how much would be available or whether this would be seen as a permanent arrangement. There is land to the north of the hotel guest parking area that could be used for more parking.

There was no Construction Plan in Appendix I of the uploaded TS but that can be conditioned if permission is forthcoming. New access are shown, I'm not sure if these are the existing ones amended but I would not see those as an issue. Any redundant access should be reinstated as footway.

I assume that we cannot condition the users of the hotel so there needs to be a mechanism in place to identify if the users of the hotel are not as in the scenario outlined in the application and more parking is required and can be provided

In response to additional information:

I would also not think it necessary to provide the additional parking spaces on the plan from the outset. However I think 6 months of operation is too soon to make a decision about whether more parking should be provided. It is really if the hotel becomes attractive to a wider clientele than the applicant is describing in the application and car trips increase. That could be over a longer timescale.

Policy Context

Section 70(2) of the Town and Country Planning Act 1990 (as amended) sets out that in considering and determining applications for planning permission the local planning authority must have regard to:-

- (a) the provisions of the development plan, so far as material to the application,
- (b) any local finance considerations, so far as material to the application, and
- (c) any other material considerations.

Section 38 (6) of the Planning and Compulsory Purchase Act (2004) makes it clear that any determination under the planning acts must be made in accordance with the development plan unless material considerations indicate otherwise.

According to paragraph 216 of the NPPF decision takers can also give weight to relevant policies in emerging plans according to:

- The stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);
- The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- The degree of consistency of the relevant policies in the emerging plan to the policies in the NPPF, the greater the weight that may be given).

The Council is preparing a Local Plan. The submission of the Draft Local Plan was subject to an Examination In Public which commenced on 4th December 2017 and the Inspector's report is awaited. These documents are a material consideration. The weight attached to the draft policies increases as the Local Plan process advances.

The development plan for Bromley comprises the Bromley UDP (July 2006), the London Plan (March 2016) and the Emerging Local Plan (2016). The NPPF does not change the legal status of the development plan.

London Plan Policies

2.6: Outer London: Vision and Strategy;
2.8: Outer London: Transport;
2.16: Strategic Outer London Development Centres2;
4.5: London's Visitor Infrastructure;
5.1: Climate Change Mitigation;
5.2: Minimising Carbon Dioxide Emissions;
5.3: Sustainable Design and Construction;
5.6: Decentralised Energy in Development Proposals;
5.7: Renewable Energy;
5.13: Sustainable Drainage;
6.3: Assessing Effects of Development on Transport Capacity;
6.9: Cycling;
6.10: Walking;
6.12: Road Network Capacity;
6.13: Parking;
7.1: Lifetime Neighbourhoods;
7.2: An Inclusive Environment;
7.3: Designing Out Crime;
7.4: Local Character;
7.5: Public Realm;
7.6: Architecture;
7.14: Improving Air Quality;
7.15: Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Appropriate Soundscapes; and
8.3: Community Infrastructure Levy.

Unitary Development Plan

BE1 - Design of new development
G6 - Land adjoining Green Belt or Metropolitan Open Land
Biggin Hill Chapter 12, Policies BH1- BH8, specifically Policy BH3 relating to South Camp
L10 - Tourist related development
T2 - Assessment of Transport Effects
T3 - Parking

Emerging Local Plan

30: Parking;
31: Relieving Congestion;
34: Highway Infrastructure Provision;
37: General Design of Development;
53: Land Adjoining Green Belt or Metropolitan Open Land;
88: Hotels;
103: Biggin Hill SOLDC;
106: South Camp;
110: Noise Sensitive Development in Biggin Hill;
113: Waste Management;
115: Reducing Flood Risk;
116: Sustainable Urban Drainage Systems;
1119: Noise Pollution;
120: Air Quality;
121: Ventilation and Odour Control;
122: Light Pollution;
123: Sustainable Design and Pollution;
124: Carbon Dioxide Reduction, Decentralised Energy Networks and Renewable Energy.

Planning History

The relevant planning history relating to the application site is summarised as follows

09/01194/FULL1 - Hotel comprising 76 bedrooms with restaurant, viewing terrace, meeting/ training rooms, administration area, gym/ sauna, function room, pilots lounge and associated facilities together with car parking and service area, and new access road. Permitted

11/02816/EXTEND - Extension of time limit for implementation of permission ref. 09/01194 granted for hotel comprising 76 bedrooms with restaurant, viewing terrace, meeting/ training rooms, administration area, gym/ sauna, function room, pilots lounge and associated facilities together with car parking and service area, and new access road. Permitted

Considerations

The main issues to be considered in respect of this application are:

- Resubmission
- Principle
- Design
- Highways
- Neighbouring amenity
- Sustainability
- Drainage
- Trees and landscaping
- Other

- CIL

Resubmission

This application follows the grant of planning permission under ref. 09/01194/FULL1 (which was subsequently granted an extended time limit for implementation under ref. 11/02816/EXTEND) for a 76 bedroom hotel on the site with restaurant, viewing terrace, meeting/training rooms, administration area, gym/sauna, function room, pilots lounge and associated facilities together with car parking and service area, and new access road.

The main changes to the scheme can be summarised as follows:

- Application site area reduced from 1.2ha to 0.7ha
- Height of development amended from 3 storeys to part 2/3 storeys
- Building footprint reduced and building re-positioned with increased set-back from Main Road
- Number of bedrooms reduced from 76 to 56
- Number of car parking spaces reduced from 96 to 42 spaces
- Access previously proposed from Main Road/Churchill Way with a dedicated entrance proposed for the hotel further away from the Wireless Road junction
- Access now proposed from Churchill Way with a new vehicular access to be provided, granting access to both the Lookout Café and the proposed hotel, with a junction formed

Principle

The application site falls within the designated South Camp area of the airport where UDP Policy BH3 applies. This says that development should be restricted to airport related uses, and that proposals for other uses will not normally be allowed unless the applicant can demonstrate a lack of demand for airport related uses, or unsuitability for operational purposes leading to long-term vacancy. The supporting text of Policy BH3 (paragraph 12.13) specifically mentions that South Camp has the potential for 'airport business and executive uses, including the provision of a hotel/restaurant facility'. It also says that 'for such activities, the relationship to the airport-related business should be explicitly justified and be of an appropriate scale'. So the UDP does direct hotel development to South Camp, provided certain criteria are met, including the establishment of an explicit relationship to the airport.

Emerging Policy 106 reiterates the broad principles of policy BH3, although it states that proposals for C1 uses will be permitted if it can be demonstrated that the proposed uses reinforce the role of the SOLDC (Strategic Outer London Development Centre), and do not impede the effective operation of other aviation related employment generating uses in the SOLDC or reduce airside access or capacity on the SOLDC. The supporting text goes on to state that the Council will adopt a flexible approach in considering potential land uses at South Camp.

London Plan Policy 2.16 identifies Biggin Hill as a SOLDC with a transport related strategic function of greater than sub-regional importance. The Mayor's Town

Centres SPG (2014) offers guidance on the implementation of SOLDCs and with particular regard to Biggin Hill, includes exploring “potential for development of... a hotel/leisure hub of a scale appropriate to serve the airport and wider cluster”.

The Council previously concluded that a hotel providing 76 bedrooms was of an appropriate size to meet the core airport related business needs at the airport and was compliant with UDP Policy BH3. The current proposal is for a hotel of reduced scale and capacity, providing a total of 56 bedrooms, and the applicant has provided justification to demonstrate that the hotel capacity would continue to be of an appropriate size to meet the needs of the Airport. It is therefore considered that the proposal would continue to be in compliance with Policy BH3.

Based on emerging Policy 106, such a justification regarding the scale of the development is not required. However, it is necessary to demonstrate that the proposal would reinforce the role of the SOLDC and that it would not impede effective operation of other aviation related employment generating uses in the SOLDC or reduce airside access or capacity in the SOLDC. It is considered that, in light of London Plan Policy and the Town Centres SPG, a hotel would reinforce the role of the SOLDC in providing a function to meet demand arising from the operation of the Airport. The applicant states that the site has limited suitability for core Airport activities, since it is ‘landside’, and in addition notes the constraints on the land arising from safeguarding requirements which prevent buildings of a certain size being erected on the west of the site (closest the runway).

UDP Policy L10 requires a sequential approach to site selection where proposed hotels are located outside of Bromley or Orpington town centres and outside of district and local centres. The previous grants of planning permission under refs. 09/01194/FULL1 and 11/02816/EXTEND were subject to a sequential assessment which concluded that the Biggin Hill Airport site represented the only possible location within the area genuinely capable of accommodating the proposed development. The applicant submits that it remains the case that the application is for a hotel to specifically serve the Airport and that its location anywhere other than the Airport would not allow it to serve this purpose or meet the clearly identified need. Having regard to the planning history and the Planning Practice Guidance (PPG) in respect of the application of the sequential test, as well as the adopted and emerging policy position regarding the Biggin Hill SOLDC, it is not considered that a further sequential assessment is required at this time.

This site is outside the Green Belt, and so there is no objection on Green Belt grounds or a need for the applicant to argue very special circumstances to justify inappropriate development. However, it is close to the boundary of the Green Belt and in accordance with UDP Policy G6 it is necessary to consider the impact of the development on the adjacent Green Belt land. The site comprises previously developed land and the proposed building, which reduces in scale towards its northern end which is closest to the Green Belt boundary, would be read in the context of much larger development including the adjacent Bombardier hanger. Accordingly it is not considered that the visual amenities of the Green Belt would be unduly injured by the proposal.

Design

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.

The hotel building would be predominantly three storeys in height with a flat roof, with a subservient two storey element at the northern end of the building providing the main entrance, lobby, reception at ground floor level and the restaurant, bar and lounge above. The hotel bedrooms will be provided within the three storey element of the building, serviced via a single central corridor. A total of 6 accessible bedrooms would be provided at ground floor level, meeting the requirement within London Plan Policy 4.5 for 10% of hotel bedrooms to be accessible.

The proposed building would be located in a relatively exposed position to the southern end of the airfield, close to the roundabout at the junction of Main Road and Churchill Way. However, the proposal would be set well back from Main Road and would be read in the context of the Bombardier hangar to the north-east, which is of much greater scale. It is considered that the massing proposed would sit comfortably in this context and would not be unduly prominent or harmful to local character. With particular regard to external appearance, high quality materials are proposed in the form of facing brickwork for the main three storey component of the built form, with the two storey element proposed to be faced with aluminium cladding and a glazed double height entrance. Relief is proposed to the brick faced elevations in the form of recessed brickwork panels and irregular 'hit and miss' window patterning, which will help to provide some rhythm and visual interest to the development.

To summarise in respect of design, the proposed development is considered to be of the high quality required in Policy and would complement adjacent development and the wider character of the locality.

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. 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 London Plan, UDP and emerging draft Local Plan should be used as a basis for assessment.

The airport, including Churchill Way which is recorded as a private road, is owned by the Council and leased to the operators. The site has a low (1b) PTAL assessment. A Transport Statement has been submitted in support of the application. The application indicates that the hotel is primarily aimed at pilots and crew who have flown into the airport and require accommodation overnight and during the day or are seeking overnight accommodation before an early morning flight out of the airport, private aircraft travellers seeking accommodation before an onward trip to London or customers doing business with companies located on the airport.

The parking standards for hotels in the UDP show up to one space per bedroom plus coach parking. There are 42 spaces shown with this application, 26 for guests and 16 for staff. Data from the last census indicates that 63% of local workers drive to work and it is considered that this is at the right level for staff parking as the application indicates there will be 24 staff. The other parking is provided at 0.46 spaces per bedroom. The previously approved 76 bed hotel had 92 car parking spaces. There is no function room with the current proposal. The applicant has sought to justify the lower parking provision proposed by stating that the principal clientele of the hotel is expected to be pilots, crew and support staff staying overnight between flights.

Coach parking is provided but in para 4.13 of the Transport Statement and para 5.62 of the Planning Statement it is stated that "The coach parking is not considered necessary for the working of this hotel, but is being provided to safeguard the interests of potential future operators." The applicant has subsequently stated that whilst the coach parking is not an operational requirement for the hotel, it has been provided to comply with Policy T3 of the UDP.

Highways officers have expressed concerns in view of the low PTAL that, if the hotel were to be used by wider clientele, the parking provision would need to be more towards one space per bedroom. In response, the applicant has stated that the initial projections set out in the submitted Market Assessment and Statement of Need suggest a user demand at the hotel of 73% from the Airport, many of these guests are unlikely to need car parking as they will arrive by plane/helicopter or by taxi. However, the applicant has advised that site area includes additional land, which could be converted to parking to provide enough space to offer one car

parking space per room should it be required either by the Council now, or by later demand (although the applicant considers that latter scenario is extremely unlikely).

Highways Officers have advised that there needs to be a mechanism in place to secure more parking in the event that the users of the hotel are not as in the scenario outlined in the application and more parking is required. It is considered in the circumstances that it would be appropriate to secure this via a condition, to require a parking survey to be carried out 18 months following the first use of the hotel, and in the event that demand for parking exceeds capacity, details of additional car parking must be approved and implemented. Further conditions are recommended to secure a number of other matters including details of the proposed accesses, visibility splays, parking and cycle provision and to ensure safe highway conditions during construction.

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 residential properties to the site are located on the opposite side of Main Road and at a lower land level, and are well separated from the hotel building itself. Whilst the development will result in additional activity in this part of the site, the acceptability of a hotel on the site, and with a greater number of bedrooms, has already been established. It is not considered that a significant harmful impact on residential amenity would arise as a result of this proposal.

Sustainability

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.

Policy 5.3 Sustainable Design and Construction of the London Plan states that the highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime. Policy 5.2 Minimising Carbon Dioxide Emissions of the London Plan states that development should make the fullest contribution to minimising carbon dioxide emissions in accordance with the hierarchy; Be Lean: use less energy; Be clean: supply energy efficiently and Be green: use renewable energy.

The applicant has submitted an Energy Strategy in support of the application, which confirms that the use of Air Source Heat Pumps, together with passive design measures and a 200m² Photovoltaic Panel array, will achieve an overall reduction in carbon emissions of 37.21% compared to the Part L baseline. It is

recommended that full details and the implementation of the sustainability measures proposed be secured by condition.

Drainage

Policy 5.13 of the London Plan requires development to utilise SUDS, unless there are practical reasons for not doing so though supporting text to the policy also recognises the contribution 'green' roofs can make to SUDS. The hierarchy within that policy is for a preference for developments to store water for later use.

The submitted Flood Risk Assessment specifies the use of permeable paving, swales and two deep boreholes soakaways to store surface water run-off for all events including the 1 in 100 year plus 40% climate change. The Councils Drainage Advisor has confirmed that this is acceptable in principle. It is recommended that the details and implementation of this is secured by condition. It should also be noted however that in view of the location of the site over a Principal Aquifer and within Source Protection Zone 3, infiltration drainage will only be permitted where it has been demonstrated that there is no unacceptable risk to groundwater.

Trees and landscaping

UDP Policy NE7 requires proposals for new development to take particular account of existing trees on the site and on adjoining land. It is not considered that the development will result in a detrimental impact on existing trees within the site, subject to appropriate protection measures during construction. There is however considered to be opportunity to provide enhanced landscaping at the site including specimen tree planting to mitigate the impact of the additional hard surfacing associated with the development. The application includes a proposed landscaping plan but with limited detail on planting, and it is therefore recommended that a full landscaping scheme is secured by planning condition.

Other matters

The application includes technical reports to address Air Quality, Noise, Contamination and Lighting issues associated with the development. These have been reviewed by Environmental Health and no objections have been raised, subject to conditions to secure the noise levels of fixed plant, ongoing contamination remediation requirements and full details of the proposed kitchen extraction system.

The application has also been referred to the Environment Agency, which has confirmed that planning permission should only be granted subject to several conditions relating to the protection of controlled waters, noting that the site is situated over a Principal Aquifer and within Source Protection Zone 3.

CIL

The Mayor of London's CIL is a material consideration. CIL is payable on this application and the applicant has completed the relevant form.

Conclusion

The acceptability of a hotel on the site has been established through previous grants of planning permission, and in this instance the proposal for a hotel of reduced scale and capacity is considered to remain compliant with adopted and emerging development plan policy. The proposed hotel is considered to respect and complement local character and no adverse impacts are anticipated in respect of the amenities of nearby residential properties. Subject to conditions, no adverse impacts are expected with regard to highways, trees, drainage, contamination, and noise and air quality.

Having regard to the above, it is recommended that planning permission be granted, subject to the conditions recommended below.

Background papers referred to during production of this report comprise all correspondence on the files set out in the Planning History section above, excluding exempt information.

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: To comply with Section 91, Town and Country Planning Act 1990.

- 2 The development hereby permitted shall only be carried out in complete accordance with the details shown on the submitted plans and documents as follows:**

Plans and drawings

- **1903_001 Rev P5 – Site Location Plan**
- **1903_002 Rev P3 – Proposed Site Block Plan**
- **1903_005 Rev P20 – Site Plan As Proposed**
- **1903_007 Rev P4 – Proposed Landscape Plan**
- **1903_010 Rev P15 - Ground Floor Layout As Proposed**
- **1903_011 Rev P15 – First Floor Layout As Proposed**
- **1903_012 Rev P14 – Second Floor Layout As Proposed**
- **1903_013 Rev P2 – Roof Layout As Proposed**
- **1903_020 Rev P11 – Elevations As Proposed**
- **1903_021 Rev P10 – Longitudinal and Cross Sections**
- **1903_025 Rev P2 – Proposed Site Elevations**
- **1903_030 Rev P3 – Detail Typical Elevations**
- **1903_031 Rev P1 – Detail Typical Cross Section**
- **1903_050 Rev P2 – Bin Store Details**
- **1903_101 Rev P1 – Accessible Bedroom Layout**
- **1903_201 Rev P2 – Bedroom Detailed Layout**

- 1903_205 Rev P1 – Bedroom Detailed Section AA
- 1903_206 Rev P1 – Bedroom Detailed Section BB
- 1903_207 Rev P1 – Bedroom Detailed Cross Section

Supporting Documents

- Design and Access Statement - HMY (October 2017)
- Planning Statement – Lichfields (November 2017)
- Market Assessment and Statement of Need – GVA (October 2017)
- Transport Statement – Motion (October 2017)
- Desk Study Report – GEA (October 2017)
- Sustainability Statement – Hoare Lea (October 2017)
- Energy Statement – Hoare Lea (October 2017)
- Ventilation and Extraction Statement – Hoare Lea (October 2017)
- Air Quality Assessment – Hoare Lea (October 2017)
- Lighting Assessment – Hoare Lea (October 2017)
- Flood Risk Assessment – Stomor (October 2017)
- Noise Assessment – Bickerdike Allen Partners LLP (October 2017)
- Statement of Community Involvement – Forty Shillings (October 2017)

REASON: For the avoidance of doubt and to ensure the satisfactory implementation of the development in accordance with Policy BE1 of the Bromley Unitary Development Plan

- 3** Details (including samples) of the materials to be used for the external surfaces of the building shall be submitted to and approved in writing by the Local Planning Authority before any work is commenced. The works shall be carried out 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.

- 4** Details of the proposed slab levels of the building(s) and the existing site levels shall be submitted to and approved in writing by the Local Planning Authority before work commences and the development shall be completed strictly in accordance with the approved levels.

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

- 5** No building or use hereby permitted shall be occupied or the use commenced until there has been submitted to and approved in writing by the Local Planning Authority a scheme of proposed hard and soft landscaping. This shall include indications of all proposed and existing trees and hedgerows on the land, details of any to be retained, together with measures for their protection (if necessary), in the course of development.

The approved scheme shall be implemented so that planting is carried out no later than the first planting season following the occupation of the building(s) or the completion of the development whichever is the sooner. All planted materials shall be maintained for five years and any trees or plants removed, dying, being damaged or becoming diseased within that

period shall be replaced in the next planting season with others of similar size and species.

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

- 6 No building materials, equipment, vehicles, plant, oil or other petroleum products shall be stored or allowed to stand within the branch spread of the trees to be retained on site, with the exception of the driveway and existing hard surfaces.

Reason: To ensure that the trees to be retained are adequately protected, in the interests of visual amenity and to comply with Policy NE7 of the Bromley Unitary Development Plan.

- 7 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.

- 8 Prior to the commencement of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

1) A site investigation scheme, based on the Desk Study Report, to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.

2) The results of the site investigation and detailed risk assessment referred to in (1) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

3) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (2) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the express consent of the local planning authority.

The scheme shall be implemented as approved.

REASON: For the protection of Controlled Waters. The site is located over a Principal Aquifer and within SPZ3 and it is understood that the site may be affected by historic contamination.

- 9 If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for, a remediation strategy detailing how this unsuspected contamination shall be dealt with. The remediation strategy shall be implemented as approved, verified and reported to the satisfaction of the Local Planning Authority.

REASON: There is always the potential for unexpected contamination to be identified during development groundworks. We should be consulted should any contamination be identified that could present an unacceptable risk to Controlled Waters.

- 10 Prior to occupation of the development, a verification report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, if appropriate, and for the reporting of this to the local planning authority. Any long-term monitoring and maintenance plan shall be implemented as approved.

REASON: Should remediation be deemed necessary, the applicant should demonstrate that any remedial measures have been undertaken as agreed and the environmental risks have been satisfactorily managed so that the site is deemed suitable for use.

- 11 Whilst the principles and installation of sustainable drainage schemes are to be encouraged, no drainage systems for the infiltration of surface water drainage into the ground are permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to Controlled Waters. The development shall be carried out in accordance with the approval details.

REASON: Infiltrating water has the potential to cause remobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of groundwater.

- 12 Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

REASON: The developer should be aware of the potential risks associated with the use of piling where contamination is an issue. Piling or other penetrative methods of foundation design on contaminated sites can potentially result in unacceptable risks to underlying groundwaters. We

recommend that where soil contamination is present, a risk assessment is carried out in accordance with our guidance 'Piling into Contaminated Sites'. We will not permit piling activities on parts of a site where an unacceptable risk is posed to Controlled Waters.

- 13 Before the use commences details of all fixed plant shall be submitted to the LPA to confirm that the criteria of the Bickerdike Allen Partners LLP report ref A11128-R01A-NW have been met. Any plant shall be installed in accordance with the approved details and permanently maintained in accordance thereafter.

REASON: To ensure that there are no adverse impacts in respect of noise and to comply with London Plan Policy 7.15.

- 14 Before the use of the hotel first commences details of the kitchen extract system shall be submitted to and approved by the Local Planning Authority. The kitchen extract system shall be installed in accordance with the approved details and shall be permanently maintained thereafter.

REASON: To ensure adequate means of ventilation for the kitchen and to comply with UDP Policy ER9.

- 15 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.

- 16 After 18 months of the first occupation of the hotel by guests a traffic survey should be undertaken at both vehicular entrances to the parking areas to ascertain the parking accumulation of the hotels car park. The surveys should be undertaken over a minimum 7 day period and should clearly show vehicle movements in and out of the car parks during the period. The results shall be provided to the Local Planning Authority for approval. If the number of vehicles is shown to exceed the parking capacity by more than 5% on more than 3 days during the survey period, the developer shall prepare details showing the provision of additional parking on the site to the Local Planning Authority. The additional parking shall be provided within 6 months following agreement in writing by the Local Planning Authority and permanently retained thereafter.

REASON: To enable an assessment of the future parking demand associated with the hotel and secure the provision of additional parking if required, to comply with Policies T3 and T18 of the Unitary Development Plan.

- 17 Details of the layout of the access roads and turning areas including the junctions with Churchill Way and dimensions of visibility splays together with the reinstatement of the redundant section of the existing access road and its junction with Churchill Way shall be submitted to and approved in writing by the Local Planning Authority and these access arrangements shall be substantially completed before any part of the development hereby permitted is first occupied. There shall be no obstruction to visibility in excess of 1m in height within the approved splays except for trees selected by the Authority, and which shall be permanently retained.

Reason: In order to comply with Policy T18 of the Unitary Development Plan and in the interest of pedestrian and vehicular safety.

- 18 Before any part of the development hereby permitted is first occupied that part of a sight line of 43m x 2.4m x 43m which can be accommodated within the site shall be provided in both directions at the junctions of the proposed accesses with Churchill Way and with the exception of trees selected by or the Local Planning Authority no obstruction to visibility shall exceed 1m in height in advance of this sight line, which shall be permanently retained as such.

Reason: In order to comply with Policy T18 of the Unitary Development Plan and to ensure that the proposal does not prejudice the free flow of traffic and conditions of general safety along the adjoining highway.

- 19 While the development hereby permitted is being carried out a suitable hardstanding shall be provided with wash-down facilities for cleaning the wheels of vehicles and any accidental accumulation of mud of the highway caused by such vehicles shall be removed without delay and in no circumstances be left behind at the end of the working day.

Reason: In the interest of pedestrian and vehicular safety and in order to comply with Policy T18 of the Unitary Development Plan.

- 20 Details of the finished surfaces of the access road, garage drives and parking areas, which shall include coloured materials and block paving, and of the street lighting installations, shall be submitted to and approved in writing by the Local Planning Authority before the development commences and the access road, drives, parking areas and street lighting shall be completed in accordance with the approved details before any of the dwellings hereby permitted are first occupied.

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

- 21 The car parking area hereby permitted shall be used only by customers and employees of the premises at the application site and for servicing of the said premises hereby permitted.

Reason: Development without adequate parking or garage provision is likely to lead to parking inconvenient to other road users and to be detrimental to amenities and prejudicial to road safety and would not comply with Policy T3 and Appendix II of the Unitary Development Plan.

22 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.

23 Details of a scheme to light the access drive and car parking areas hereby permitted shall be submitted to and approved in writing by the Local Planning Authority before the development hereby permitted is commenced. The approved scheme shall be self-certified to accord with BS 5489 - 1:2003 and be implemented before the development is first occupied and the lighting shall be permanently retained thereafter.

Reason: In order to comply with Policy T3 and Appendix II of the Unitary Development Plan in the interest of visual amenity and the safety of occupiers of and visitors to the development.

24 Prior to the commencement of the development hereby permitted a Construction Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan shall include measures of how construction traffic can access the site safely and how potential traffic conflicts can be minimised; the route construction traffic shall follow for arriving at and leaving the site and the hours of operation, but shall not be limited to these. The Construction Management Plan shall be implemented in accordance with the agreed timescale and details.

Reason: In order to comply with Policy T5, T6, T7, T15, T16 & T18 of the Unitary Development Plan and in the interest of the amenities of the adjacent properties.

25 Prior to the commencement of development above ground level, full details of the sustainability measures as set out in the Energy Strategy shall be submitted to and approved in writing by the Local Planning Authority. The measures shall be implemented in full accordance with the approved details prior to the first use of the hotel and permanently retained in working order thereafter.

REASON: To comply with London Plan Policy 5.2.