



Mill Meadows, Bexley

Planning Statement

Cray Mill Leisure Limited

June 2021

BPTW brings together specialisms in Architecture and Planning to transform not just physical spaces, but people's lives. Our work tells our story. We are bold. We are innovative. We care.

For 30 years we have worked with many of the UK's leading developers and housing providers to create desirable new homes and places. With over 100 staff, our teams are made up of individual experts who cultivate a friendly, creative and collaborative partnership with everyone we work with. From start to finish, we are committed to deliver success on every measure.

BPTW. Together we transform people's lives.

For further information, contact:

David Akam, Planner dakam@bptw.co.uk

London Studio

40 Norman Road
Greenwich
London SE10 9QX
t. 020 8293 5175

Midlands Studio

Alpha Works, Alpha Tower
Suffolk Street Queensway
Birmingham B1 1TT
t. 0121 667 6175

bptw.co.uk

Document Control Sheet

Project Name Mill Meadows
Project Ref 16-193
Report Title Planning Statement
Doc Ref v1
Date June 2021

		Position	Date
Prepared by	David Akam	Planner	04/06/21
Reviewed by	Jane Richardson	Associate	09/06/21
Approved by	Jane Richardson	Associate	11/06/21

For and on behalf of BPTW

Revision	Date	Description	Prepared	Reviewed	Approved

Contents

1.0	Introduction.....	5
2.0	Site and Surrounding Area	7
3.0	Pre-Application Advice	11
4.0	Development Proposal	13
5.0	Planning Policy Framework	15
6.0	Planning Considerations	26
7.0	Summary and Conclusion.....	32

1.0 Introduction

1.1 This Planning Statement has been prepared in support of a detailed planning application submitted to the London Borough of Bexley (*the Council*) by BPTW, on behalf of Cray Mill Leisure Limited (*the Applicant*), for a sports development on land at Mill Meadows, Bexley, DA5 1JX (*the Site*).

1.2 This application seeks full planning permission for the following description of development:

Renovation and extension of the existing stable block to provide changing rooms and a pavilion facility (Use Class F2(c)), the renovation of the existing shed to provide ancillary storage at ground level and club-admin space at first floor level, the demolition of all other existing buildings and structures, creation of an all-weather hockey pitch and secondary grass training pitch (Use Class F2(c)), together with associated car and cycle parking, landscaping and associated works.

1.3 In summary, the proposed development includes an all-weather hockey pitch and a grass training pitch for the Burnt Ash (Bexley) Hockey Club (BAHC). The existing stable building is to be renovated and extended to provide changing rooms and a pavilion facility for BAHC. In addition, a large shed adjacent to the vehicular entrance to the Site is to be refurbished and used for ancillary storage/ onsite administration space in association with the Hockey Club use. All other buildings and structures on the Site, most notably those to the south of the existing stable building, are to be demolished and the floorspace consolidated to form the extension.

1.4 Vehicular access to the Site will continue to be from the existing access to the north-east, via a private road adjoining Bexley High Street.

1.5 12no. car parking spaces are proposed, two of which would be for disabled users. In addition, 20no. cycle parking spaces are proposed.

1.6 The purpose of this Statement is to set out the development proposal and how it relates to the statutory development plan and other material considerations. The Planning Statement should be read in conjunction with the supporting documents listed below in paragraph 1.7.

Submission Documents

1.7 In addition to this Planning Statement, the application is accompanied by the following documents.

Report	Author
Application and CIL forms	BPTW
Cover Letter	BPTW
Site Location Plan and Existing Block Plan (16-193 D001)	BPTW
Proposed Wider Site Plan (16-193 D010)	BPTW
Proposed Site Plan (16-193 D011)	BPTW
Proposed Clubhouse Ground Floor Plan (16-193 D100)	BPTW
Proposed Shed Plans (16-193 D101)	BPTW
Proposed Clubhouse Elevations (16-193 D200)	BPTW
Design and Access Statement	BPTW
Flood Risk Assessment	Ambiental

Preliminary Ecological Appraisal	Southern Ecological Solutions
Transport Assessment	Bellamy Roberts
Tree Survey and Arboricultural Impact Assessment	Southern Ecological Solutions

Structure of this Statement

1.8. This Planning Statement is structured as follows:

- > **Section 2** describes the Site within the immediate local context;
- > **Section 3** summarises the pre-application advice received;
- > **Section 4** sets out the proposed development in greater detail;
- > **Section 5** identifies the relevant national, regional and local policy context;
- > **Section 6** addresses the material planning considerations of the proposal; and
- > **Section 7** draws together the conclusions of the report.

1.9. The appendices referred to in the text are included at the end of this Statement.

2.0 Site and Surrounding Area

- 2.1. The Site, which covers approximately 3.4 ha, comprises the area of land at the rear of the Old Mill on the west side of the River Cray known as Mill Meadows. See Figure 1 below.



Figure 1

- 2.2. The Site is located within the St. Mary and St. James ward of the London Borough of Bexley and comprises of a number of derelict buildings previously used in relation to stables and a horse-riding facility (sand school), and an extensive meadow. The Site is bounded by an elevated railway line associated with Bexley Railway Station to the north and northwest. A 4-storey residential building with commercial space at ground floor and car park lies directly adjacent to the Site to the north.
- 2.3. Northeast of the Site is a 3-storey office building. The Site is bounded to the south by the River Cray. To the west of the Site, beyond Bexley Cricket Club and BAHC, are large meadows. Vehicular access to the Site is from the north, off Bexley High Street.
- 2.4. Vehicular access is also available from the west via Manor Way, serving Bexley Cricket Club and BAHC outside of the cricket season. Bexley Railway Station is situated adjacent to the Site to the west and accessed via Bexley High Street and onto Station Approach. There is also pedestrian access through Manor Way and Tan Yard Lane to the Site.
- 2.5. The Site is situated within the Metropolitan Green Belt. The majority of the Site is identified as an Area of Metropolitan Importance for Nature Conservation. The far north-eastern part of the Site falls within the boundary of the Old Bexley Conservation Area (where the existing stable block and sheds are located).
- 2.6. There are two Tree Preservation Orders that apply to the site; TPO.No.1 1950 W4 covers trees along the southern boundary, while TPO 76/1622 protects two trees within the belt of trees next to the Cray. These can be identified by T14 and T15 on the Tree Protection Plan within the submitted Arboricultural Impact Assessment.

- 2.7. The north-eastern half of the Site (including where the existing buildings are located) falls within Flood Zone 2 and 3a, according to the Environment Agency’s Flood Risk Maps.
- 2.8. With regards to access, the Site has good transport links and a Public Transport Accessibility Level (PTAL) rating of 3 (where 1 is low and 6 is high).
- 2.9. The north-eastern part of the Site, immediately to the rear of The Old Mill, is currently occupied by a number of buildings and areas of hardstanding which are currently vacant, but which were associated with a former equestrian use of the Site. The existing brick stables, pre-fabricated timber stables, existing shed and other outbuildings are illustrated in Figure 2 below, though it should be noted that the caravans and railway carriages have since been removed from the Site. The total footprint of the extant buildings and outhouse structures is 262.4sqm. The area in pink denotes existing hardstanding.
- 2.10. The Site also includes a large area of open land to the west and southwest of those buildings, adjoining the Bexley Cricket Club cricket pitch and practice areas, part of which was used as the sand school (horse-riding facility) associated with the former equestrian use. The sand school, situated along the western Site boundary adjacent to the car park for the neighbouring residential development, is now overgrown.

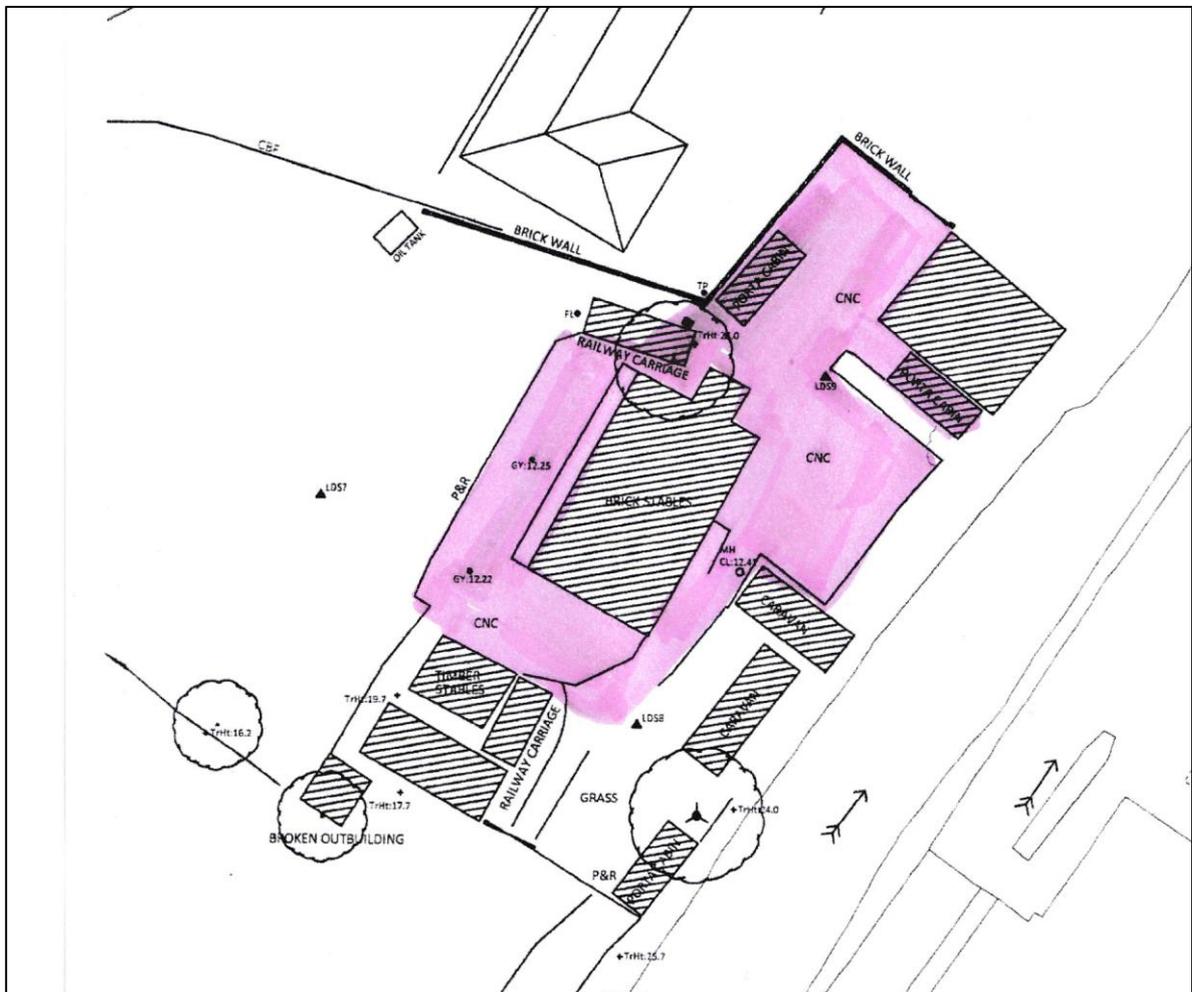


Figure 2 – Existing Structures on Site

- 2.11. The area surrounding the Site is characterised by a mix of land uses however the predominant land use is residential. A 3-storey office building is situated directly to the northeast of the Site (Land to the Rear of the

Old Mill, Bexley High Street). Planning permission was granted in 2012 for development and has since been built out (LPA ref. 12/00551/FUL).

- 2.12. Further north of the office building is a development of 70 residential dwellings within two buildings ranging from two to four storeys (Mill Garage, 92 Bexley High Street). The scheme includes a 72-space surface carpark (LPA ref. 10/00606/FULM).

Planning History

- 2.13. A search of the London Borough of Bexley's online planning register returned the following recent and relevant planning history for the Site itself:

LPA Ref	Description	Decision Date
18/01129/FULM	Provision of 2 sports pitches, removal of redundant buildings, conversion of the old livery stable into 3 residential units & construction of 6 new residential units.	Refused – 17.10.2018 Dismissed at appeal – 30.10.2019 (REF APP/D5120/W/19/3226872) Further details are provided below.
14/02102/FULM	Provision of two sports pitches with removal of redundant buildings. Erection of residential units comprising one block providing 1 x 4 bed and 3 x 3 bed houses, one three storey block to provide cycle and refuse storage on the ground floor with 2 x 2 bed flats above and alterations and conversion of the stable block to provide 3 x 2 bed houses.	Refused. 16.11.2017
13/00287/FULM	Provision of two sports pitches, a public right of way and access to the River Cray. Erection of residential units comprising one block providing 1 x 4 bed and 3 x 3 bed houses, one three storey block to provide cycle and refuse storage on the ground floor with 2 x 2 bed flats above and alterations and conversion of the stable block to provide 3 x 2 bed houses.	Withdrawn

- 2.14. The planning application (LPA ref.18/01129/FULM) was refused under delegated powers for the following reasons:

- This proposal falls into a flood risk vulnerability category that is inappropriate to the Flood Zone in which the application site is located. It fails the 'Sequential Test' because there are reasonably available alternative sites in areas with a lower probability of flooding that would be appropriate for the residential development proposed and is therefore contrary to paragraph 158 of the NPPF (2018).*
- The proposed residential scheme is located in Flood Zone 3b (the Functional Floodplain), which comprises land where water has to flow or be stored in times of flood. Buildings used for dwelling houses are a More Vulnerable flood risk use and National advice states that development should not be permitted where it is a More Vulnerable use within Flood Zone 3b.*
- The proposed re-profiling of the land would have an impact on flood risk which could result in flood damage to other properties. The Local Planning Authority is not satisfied that the proposed development would be safe and not lead to increased flood risk elsewhere contrary to paragraph 163 of the NPPF (2018).*

4. *The proposed redevelopment of the site to provide residential accommodation is considered to be inappropriate development which is by definition harmful to the Green Belt. It is considered that the development would have a greater impact on the openness of the Green Belt than the existing development and would conflict with the purposes of including land within it. This is contrary to the provisions of the National Planning Policy Framework, and the requirements of the London Plan Policy 7.16, Core Strategy (2012) Policies CS01, CS06 and CS17 Saved Policies ENV4, ENV11, ENV22 and ENV39 of the Unitary Development Plan (2004).*
5. *The Council is not satisfied that the proposed development would not avoid adverse impact or mitigate against the nature conservation interests of the Site of Metropolitan Importance for Nature Conservation, contrary to Policy 7.19 of the London Plan, Policy CS18 of the Core Strategy, and the requirements of Chapter 15 of the NPPF (2018).*
6. *No details of the parking implications of the proposed all weather hockey pitch have been provided, in terms of quantity, duration of stay and the times of any additional parking demand. The applicant has not been able to demonstrate to the Council's satisfaction that any additional parking likely to be generated can be accommodated within the site and will not lead to parking on adjacent highways. This is contrary to saved Policy T17 of the Unitary Development Plan (2004).*

2.15. In dismissing the appeal in respect of 18/01129/FULM, the Planning Inspector concluded that:

- > The Site constitutes previously developed land;
- > The additional volume and height of the proposed dwellings compared with the existing buildings and hard surfacing on the Site would cause harm to the visual openness of the Green Belt;
- > Due to updated EA data the area where the dwellings were proposed, were within the 1 in 100-year flood extent, and thus within Flood Zone 3a as defined in the Planning Practice Guidance (PPG) and not Flood Zone 3b, following which the Council rescinded Reason for Refusal 2.
- > The Inspector lacked adequate evidence to be certain that the proposed voids under the proposed residential development would be sufficient or appropriate to maintain current levels of flood storage capacity on the site.
- > The Flood Risk Sequential Test did not provide consideration to any sites of a size which would accommodate only the residential part of the scheme therefore the Inspector concluded it has not been demonstrated that there are no suitable or available sequentially preferable sites that would accommodate "more vulnerable" residential development. The sequential test therefore did not pass.
- > It was not demonstrated to the satisfaction of the Inspector that the proposed development could be carried out without adverse effects on water voles.
- > The applicant did not demonstrate that the all-weather hockey pitch would avoid adverse effect on the convenience of local residents and highway users with particular regard to on-street parking.
- > The proposed cricket pitch did not have an adverse impact on the openness of the Green Belt and is a water compatible use in terms of the PPG.

3.0 Pre-Application Advice

- 3.1. In accordance with the National Planning Policy Framework (NPPF 2018, revised 2019), the Applicant has sought pre-application planning advice from the London Borough of Bexley (LBB).
- 3.2. The Applicant submitted sketch proposals to LBB on 20th December 2019, seeking advice in respect of a scheme comprising one all-weather hockey pitch and the redevelopment and consolidation of the existing buildings on site to provide three commercial units (A2, B1, B8 & D2 Use Classes).
- 3.3. A meeting was held on 24th February 2020 and a formal written response was subsequently provided on 9th April 2020. This written response can be summarised as follows:
 - > With regard to the all-weather hockey pitch the Council has never raised an issue with this element of any proposal previously submitted and will therefore in all likelihood not raise a concern this time. Outdoor recreational facilities, on its own, in the Metropolitan Green Belt are considered appropriate in line with paragraph 145 of the NPPF, 2019.
 - > Replacing of the existing buildings located in the northern corner of the site with replacement buildings could be acceptable in principle and consistent with Paragraph 145 of the NPPF (2019). However, the proposed new buildings would either have to be considered as replacement buildings or, partial redevelopment of previously developed land.
 - > Replacement Buildings - For replacement buildings to be appropriate development they must be for the same use and not materially larger than the ones being replaced. You would therefore need to demonstrate that the buildings would be in the same use and not materially larger in terms of footprint, floor area, volume and overall height. It is highly unlikely that the Council would support a development which provides A2, B1 or B8 uses within the Metropolitan Green Belt as these use classes are not appropriate uses.
 - > Limited infilling - The NPPF (2019) also provides for limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use, which would not have a greater impact on the openness of the Green Belt than the existing development. In this regard, it is noted that the existing buildings are single storey structures and the proposal is to maintain this massing, scale and height. The proposed scheme is no more visually prominent than the existing buildings and the dwellings to the north given they are taller and of a greater scale. The proposal is not visually detrimental to nor would it detract from the openness of the Green Belt. Indeed, the proposals would improve the appearance of the Green Belt by clearing derelict buildings and detritus from this part of the Site and introducing landscaping.
 - > The NPPG provides further clarification on assessing the impact of a proposal on the openness of the Green Belt. Paragraph: 001 Reference ID: 64-001-20190722 highlights a judgment based on the circumstances of the case is needed. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:
 - openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;
 - the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and
 - the degree of activity likely to be generated, such as traffic generation.
 - > No assessment of the proposals has been made against the above criteria. The Courts have held that the impact on 'openness' goes beyond the visual impact and is one which is open textured. The starting point for such an assessment should be the footprint, floor area, volume and height.

- > In addition, there is a consideration of the wider impact on openness and the potential urbanised feel the redevelopment could have on the area, the proliferation of structures needed to support the proposed uses (including car parking) as well as the vehicular movements associated with the proposed development.
- > Many of the existing units have blended into the background, on some of them are small outbuildings.
- > You have failed to demonstrate that the proposal would not have a material greater impact on openness. We therefore remain unconvinced that the proposal would be 'appropriate development' in the Green Belt.
- > Some D2 uses may be considered appropriate within the Metropolitan Green Belt, but they would have to be ancillary to and be used in connection with the proposed all-weather hockey pitch i.e., changing rooms. A stand-alone gym for example is not appropriate development and would not be supported due to the urbanised feel such a use would have and the vehicle movements and impact on openness.
- > As it stands the principle of the development remains inappropriate within the Green Belt. The NPPF (2019) is clear that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances (VSC). No VSC has been advanced.
- > Given that the Council has a fundamental objection to this proposal in principle, we offer no support for this proposal and not assess the impact of the proposed new buildings in relation to their impact on the openness of the Metropolitan Green Belt, and overcoming the other previous grounds for refusal, which including the flood protection, biodiversity, impact on on-street parking and/or the impact on the nearby residential dwellings or wider highways considerations given the uses now proposed.
- > If you choose to make an application consideration will not only have to be given to the above, but also in relation to the Site being of Metropolitan Importance for Nature Conservation, flood risk and drainage.
- > Any parking provision would have a material impact on the consideration of this proposal and the impact on the openness of the Green Belt. Parking provision could affect the Council's position in terms of considering the proposed play pitches being appropriate development (i.e., parking could have an impact on the openness of the Green Belt.)

4.0 Development Proposal

4.1. This section provides a description of the proposed development. Further details are provided in the accompanying Design and Access Statement, prepared by BPTW Architects, and within the specialist reports submitted in support of the Planning Application.

4.2. This application seeks full planning permission for the following description of development:

Renovation and extension of the existing stable block to provide changing rooms and a pavilion facility (Use Class F2(c)), the renovation of the existing large shed to provide ancillary storage at ground level and club-admin space at first floor level, the demolition of all other existing buildings and structures, creation of an all-weather hockey pitch and secondary grass training pitch (Use Class F2(c)), together with associated car and cycle parking, landscaping and associated works.

4.3. In summary, the proposed development includes an all-weather hockey pitch and a grass training pitch. The existing stable building is to be renovated and extended to provide changing rooms and a pavilion facility. The primary organisation who will utilise and manage the facilities is Burnt Ash (Bexley) Hockey Club, particularly on Saturdays, however during the week it will be made available to local schools such as Bexley Church of England School, whilst on weekday nights and some Sundays it will be available for hire for other sporting organisations.

4.4. In addition, the large shed adjacent to the vehicular entrance to the Site is to be refurbished and used for ancillary storage at ground level with administration space for BAHC at first floor level. All other buildings on the Site, most notably those to the west of the existing stable building, are to be demolished.

Layout, Scale and Massing

4.5. The extent of the built development proposals in comparison to the existing situation is best understood by comparing Figure 2 with Figure 3. The proposed pavilion building comprises the existing brick stable building, plus a 60sqm extension to the west. The extension is 3.6m in height, sitting comfortably below the height of the main building which is 5.5m tall.

4.6. Equally, the proposed storage units are to be formed via a renovation of the existing shed unit in the north-east of the Site, adjacent to the vehicular access. There would be no increase in footprint, nor building height, as a result of the proposals.

4.7. Overall, the proposed footprint of the retained and extended buildings, following the demolition of all remaining structures, would be 247.8sqm which is less than the current footprint of 262.4sqm, and there would be no height increases. The demolition of the pre-fabricated timber stables and additional outbuildings to the west of the existing brick stables would mean that the general spread of buildings across this end of the Site would be reduced and would see the built-up area shift eastwards back towards Bexley village.

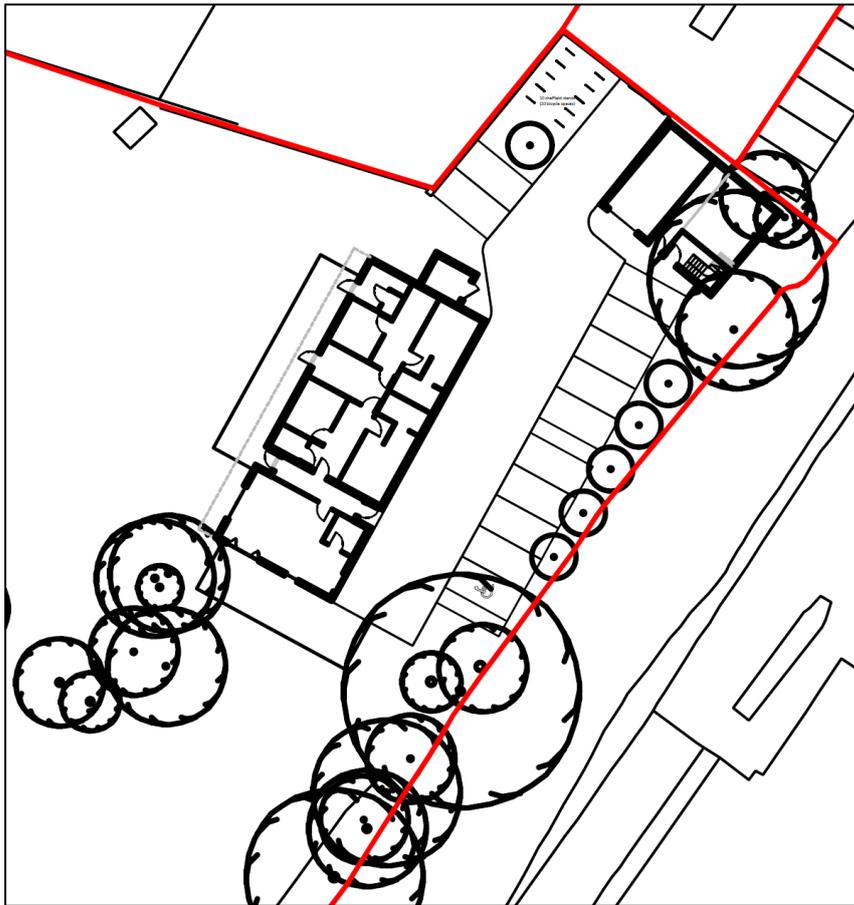


Figure 3 – Proposed Site Plan (Pavilion, storage units and parking)

Appearance and Materials

- 4.8. All external materials for the club house are to be retained as per the existing stable block, refurbished, or replaced with like for like materials. The extension element will be constructed using like for like materials as the existing stable block. Similarly for the storage units, these will re-use the existing shed materials where possible or be replaced with like for like materials.

Car and Cycle Parking

- 4.9. Vehicular access to the proposed parking area on Site will continue to be taken from the existing vehicular access in the north-east of the Site, which connects to Bexley High Street via a private driveway.
- 4.10. As can be seen by comparing Figures 2 and 3, the extent of hardstanding would remain similar in area, if not reduced by these proposals.
- 4.11. 12no. car parking spaces are proposed, two of which would be for disabled users. In addition, 20no. cycle parking spaces are proposed.

Refuse

- 4.12. A small bin store is proposed at the northern end of the proposed pavilion, which is considered to be sufficient to house the minimal waste expected to be produced by the end user. It is in the most convenient location possible for club admin staff to drag to the collection point along the site's access road.

5.0 Planning Policy Framework

5.1. This section considers the relevant planning policy framework for the Site and material considerations. The policies considered most relevant to this application are set out below.

Development Plan

- 5.2. The current development plan for the area comprises the following:
- > The London Plan (March 2021);
 - > The Bexley Core Strategy (2012); and
 - > The saved policies of the Bexley Unitary Development Plan (UDP).

Site Designations

- 5.3. The Site is situated within the Metropolitan Green Belt.
- 5.4. The majority of the Site is identified as an Area of Metropolitan Importance for Nature Conservation.
- 5.5. The far north-eastern part of the Site falls within the boundary of the Old Bexley Conservation Area (where the existing buildings are located).
- 5.6. According to the Environment Agency's Flood Zone Maps, the Site is within Flood Zones 1, 2 and 3. The proposed hockey pitches are primarily in Flood Zones 2 and 3, while the proposed pavilion buildings are in Flood Zone 3b.

National Planning Policy and Guidance

- 5.7. Regard has been given to the following national planning policy and guidance:
- > The National Planning Policy Framework (2018, revised 2019)
 - > The National Planning Practice Guidance (2018, as amended)

NPPF (2019)

5.8. The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England, and how these are expected to be applied and taken into consideration in planning decisions. The following policies are considered most relevant to this application.

Chapter 4: Decision-taking

5.9. At the heart of the NPPF is a 'presumption in favour of sustainable development'. **Para.11** states that for decision-taking, this means:

a) Approving development proposals that accord with an up-to-date development plan without delay; or

b) Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i) The application of policies in this Framework that protect areas or assets of particular importance provides clear reason for refusing the development proposed; or

ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework as a whole.

Chapter 8: Promoting Healthy and Safe Communities

- 5.10. **Para. 91** states that planning policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction. Para. 91c further states that the aim to: “...enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.”
- 5.11. **Para.92** states that planning decisions should plan positively for the provision and use of community facilities (such as sports venues)
- 5.12. **Para.96** states that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities.

Chapter 9: Promoting Sustainable Transport

- 5.13. **Para. 108** states that when considering development proposals, it should be ensured that appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location.
- 5.14. **Para. 109** states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Chapter 12: Achieving Well-Designed Places

- 5.15. **Para.127** states that planning decisions should ensure that developments are visually attractive as a result of good architecture, layout and appropriate landscaping; they should be sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); and development should optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development and support local facilities and transport networks.

Chapter 13: Protecting Green Belt Land

- 5.16. **Para.133** states that the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. **Para.134** sets out the five purposes of the Green Belt.
- 5.17. **Para.143** states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.
- 5.18. **Para.144** states that 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 resulting from the proposal, is clearly outweighed by other considerations.
- 5.19. **Para.145** sets out the circumstances whereby the construction of new buildings in the Green Belt are not considered to be inappropriate. These include:

b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the

facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;

c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;

d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;

g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: – not have a greater impact on the openness of the Green Belt than the existing development; or – not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

5.20. **Para.146** states that certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These includes

d) the re-use of buildings provided that the buildings are of permanent and substantial construction; and

e) material changes in the use of land (such as changes of use for outdoor sport or recreation).

Chapter 14 – Meeting the Challenge of Climate Change, Flooding and Coastal Change

5.21. **Para.155** states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

5.22. **Para.157** requires all plans to apply a sequential, risk-based approach to the location of development so as to avoid, where possible, flood risk to people and property.

5.23. **Para.158** explains how the sequential test aims to steer new development to areas with the lowest risk of flooding. Development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.

5.24. **Para.159** states that if it is not possible for development to be located in zones with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed (as set out in the Flood Risk Vulnerability Classification).

5.25. **Para.160** states that the application of the exception test should be informed by a strategic or sitespecific flood risk assessment. To pass the exception test it should be demonstrated that:

a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and

b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

5.26. **Para.161** adds that both elements should be satisfied for development to be allocated or permitted.

- 5.27. **Para.163** states that LPAs should ensure that flood risk is not increased elsewhere. Development should only be allowed in areas at risk of flooding where, in the light of a FRA (and the sequential and exception tests, as applicable) it can be demonstrated that:
- a. within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;
 - b. the development is appropriately flood resistant and resilient;
 - c. it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
 - d. any residual risk can be safely managed; and
 - e. safe access and escape routes are included where appropriate, as part of an agreed emergency plan.
- 5.28. **Para.164** states that applications for some minor development and changes of use should not be subject to the sequential or exception tests, but should still meet the requirements for site-specific FRAs.
- 5.29. **Para.165** states that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.

Chapter 15 – Conserving and Enhancing the Natural Environment

- 5.30. **Para.170** states that planning policies and decisions should contribute to and enhance the natural and local environment by:
- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
 - b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
 - c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
 - d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.*
- 5.31. **Para.175** states that when determining planning applications, local planning authorities should apply the following principles:
- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
 - b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.

Regional Planning Policy

The London Plan (March 2021)

- 5.32. The London Plan provides a strategic plan for London, setting out an integrated economic, environmental, social, and transportation framework for the development and growth of London. It focuses on optimising brownfield sites, particularly for new housing development, removing the restrictive density matrix and placing the emphasis on design-led sustainable development.
- 5.33. The following strategic policies are considered most relevant to the application.
- 5.34. **Policy D4 (Delivering Good Design)** states that:
- > Design analysis and development certainty - Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and placemaking. Where appropriate, visual, environmental and movement modelling/assessments should be undertaken to analyse potential design options for an area, site or development proposal.
 - > Design scrutiny - Design and access statements submitted with development proposals should demonstrate that the proposal meets the design requirements of the London Plan. The design of development proposals should be thoroughly scrutinised by borough planning, urban design, and conservation officers. Applicants should make use of the design review process to assess and inform design options early in the planning process. The format of design reviews for any development should be agreed with the borough and comply with the Mayor's guidance on review principles, process and management.
- 5.35. **Policy G2 (London's Green Belt)** states that the Green Belt should be protected from inappropriate development: (1) development proposals that would harm the Green Belt should be refused except where very special circumstances exist, (2) subject to national planning policy tests, the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported.
- 5.36. **Policy G4 (Open Space)** states that development proposals should where possible create areas of publicly accessible open space, particularly in areas of deficiency.
- 5.37. **Policy G6 (Biodiversity and Access to Nature)** states that Sites of Importance for Nature Conservation (SINCs) should be protected. Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts: (1) avoid damaging the significant ecological features of the site; (2) minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site; and (3) deliver off-site compensation of better biodiversity value. Policy G6 goes on to state that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process. Proposals which reduce deficiencies in access to nature should be considered positively
- 5.38. **Policy G7 (Tree and Woodlands)** states that development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees

there should be adequate replacement based on the existing value of the benefits of the trees removed. The planting of additional trees should generally be included in new developments.

- 5.39. **Policy SI 12 (Flood Risk Management)** states that development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.
- 5.40. **Policy SI 13 (Sustainable Drainage)** states that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the drainage hierarchy.
- 5.41. **Policy T4 (Assessing and Mitigating Transport Impacts)** states that:
- A. Development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity.
 - B. Transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network at the local, network-wide and strategic level, are fully assessed. Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. Travel Plans, Parking Design and Management Plans, Construction Logistics Plans and Delivery and Servicing Plans will be required having regard to Transport for London guidance.
 - C. Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified.
 - D. Where the ability to absorb increased travel demand through active travel modes has been exhausted, existing public transport capacity is insufficient to allow for the travel generated by proposed developments, and no firm plans and funding exist for an increase in capacity to cater for the increased demand, planning permission will be contingent on the provision of necessary public transport and active travel infrastructure.
 - E. The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated.
 - F. Development proposals should not increase road danger.
- 5.42. **Policy DF1 (Delivery of the Plan and Planning Obligations)** states that applicants should take account of Development Plan policies when developing proposals and acquiring land. Development proposals should provide the infrastructure and meet the other relevant policy requirements necessary to ensure that they are sustainable and to support delivery of the Plan. Where relevant policies in local Development Plan Documents are up to date, it is expected that viability testing should normally only be undertaken on a site-specific basis where there are clear circumstances creating barriers to delivery.

Local Planning Policy

The Bexley Core Strategy (2012)

- 5.43. The Bexley Core Strategy was adopted on 22nd February 2012. The following policies are considered to be particularly relevant:
- 5.44. **Policy CS01 (Achieving Sustainable Development)** states that the Council will seek to achieve sustainable development, in line with the vision set out in Bexley's Sustainable Community Strategy, to create a 'strong, sustainable and cohesive community', in order to provide people equal access to a better quality of life, protect the environment, promote the local economy and encourage an active and healthy lifestyle. It also sets out the

sustainable development principles that developers will be required to address. These include protecting designated areas, such as metropolitan green belt, from inappropriate development so as to preserve, enhance and promote Bexley's network of open spaces and waterways, heritage, biodiversity and geological assets.

5.45. **Policy CS06 (Crayford and Old Bexley Geographic Region)** sets out the vision for the area will be achieved. This includes:

(e) ensuring development enhances biodiversity, particularly along the River Cray, and mitigates against flood risk, particularly through design solutions that incorporate flood resilience and resistance in areas at risk of flooding and, where appropriate, seeking to ensure that development in areas susceptible to localised flooding incorporates measures to manage surface water drainage;

(f) supporting improved public access to existing open spaces and improved recreation and community facilities.

5.46. **Policy CS08 (Adapting to and Mitigating the Effects of Climate Change, Including Flood Risk Management)** states that all development should contribute to the delivery of sustainable development by planning for, adapting to, and mitigating the impacts of climate change, by reducing the carbon emissions related to the construction and operation of all development.

5.47. **Policy CS15 (Achieving an Integrated and Sustainable Transport System)** states that the Council will work to achieve a comprehensive, high quality, safe, integrated and sustainable transport system which makes the most of existing and proposed transport infrastructure within the borough and seeks to ensure a much improved and expanded role for public transport through a number of actions.

5.48. **Policy CS17 (Green Infrastructure)** states that Bexley's green infrastructure, including open spaces and waterways will be protected, enhanced and promoted as valuable resources. This will be achieved by a number of measures, including:

(a) protecting metropolitan green belt and metropolitan open land from inappropriate development;

(d) protecting and enhancing the biodiversity, heritage and archaeological values of open spaces; and

(e) protecting significant green corridors, and seeking opportunities to increase connectivity between the network of green spaces and habitats.

5.49. **Policy CS18 (Biodiversity and Geology)** states that the Council will protect and enhance its biodiversity and geological assets, whilst complying with national and regional policy and guidance through a number of measures, including:

(b) Protecting, conserving and enhancing Bexley's Sites of Importance for Nature Conservation (SINC);

(c) Resisting development that will have a significant impact on the population or conservation status of protected species and priority species;

(d) Protecting and enhancing the natural habitat as far as practicable, seeking biodiversity enhancements and improved access to nature, particularly in areas of deficiency; and

(g) Seeking opportunities to provide for greening of the built environment, including green roofs and walls in new buildings.

5.50. **Policy CS19 (Heritage and Archaeology)** states that the Council will manage its heritage and archaeological assets, whilst seeking opportunities to make the most of these assets, including adapting to and mitigating the effects of climate change. This will be achieved by a number of measures, including:

(c) conserving and enhancing the significance of heritage assets, their setting, and the wider historic environment, including statutorily listed buildings; locally listed buildings of architectural or historic interest, conservation areas, registered parks and gardens, and archaeological sites; and

(d) protecting heritage assets from development that is likely to adversely impact on the significance, integrity, character or appearance of an asset or its setting.

The Bexley Unitary Development Plan (UDP).

5.51. The Bexley UDP was adopted on 28th April 2004. Some policies in the UDP expired in 2007 and following the adoption of the Core Strategy in 2012, some policies were replaced. The following saved policies of the UDP are considered to be particularly relevant:

5.52. **Policy ENV4 (Metropolitan Green Belt)** states the Proposals for development within the MGB must comply with the following criteria:

1. The proposed development should not detract from the function and appearance of the GB;
2. Any buildings or structures should be appropriate in bulk and appearance to the open nature of the GB, and their materials should be sympathetic to the landscape;
3. Wherever possible, new building should be carefully sited in relation to existing buildings on or near the site;
4. The proposed development should retain sufficient space around the building, within the site, to maintain the contribution the site makes to the character of the GB by virtue of its open and spacious nature;
5. A high standard of landscaping and design will be required, reflecting the character of the surrounding area; and
6. Habitats and features of landscape or nature conservation importance will be protected.

5.53. **Policy ENV8 (Metropolitan Green Belt)** states that the reuse of buildings in the Green Belt may be appropriate provided that:

1. it does not have a materially greater impact than the present use on the openness of the Green Belt or the purposes of including land in the Green Belt;
2. any extension or reused buildings and associated uses of land surrounding the building preserve the openness of the Green Belt and the purposes of including land in the Green Belt (for example external storage, hard standing, car parking, boundary walling or fencing);
3. the buildings are of permanent and substantial construction and are capable of conversion without major or complete reconstruction; and
4. the form, bulk and general design of the buildings are in keeping with their surroundings.

5.54. **Policy ENV10 (Metropolitan Green Belt)** states that the Council will encourage recreational uses of a predominantly open nature to locate in suitable parts of the MGB. Special consideration will be given to open-air recreational proposals, which would result in the improvement of under-used or damaged land.

5.55. **Policy ENV22 (Heritage Land)** states that the Council will protect the individual quality and character of and promote access to the areas of heritage land.

- 5.56. **Policy ENV28 (Local Nature Reserves)** states that the Council will declare and manage as Local Nature Reserves (LNR) sites in which it has a legal interest, that are of special importance to the local community for wildlife and nature conservation. Within these areas, development will be resisted that would endanger the preservation of those special characteristics that lead to designation.
- 5.57. **Policy ENV35 (Trees)** states that the Council will seek the protection and long-term retention of trees of amenity, nature or landscape conservation value on development sites or elsewhere where they might be at risk and, in appropriate cases, will require new tree and hedge planting as part of a landscaping scheme for development proposals.
- 5.58. **Policy ENV39 (Built Environment)** states that the Council will seek to ensure that all new developments, including alterations and extensions, changes of use and other operations, including highway improvements, are satisfactorily located and are of a high standard of design and layout. In determining applications the Council will consider the extent to which the proposal:
1. is compatible with the character of the surrounding area, would not prejudice the environment of the occupiers of adjacent property, or adversely affect the street scene by reason of its (a) scale, (b) massing, (c) height, (d) layout, (e) elevational treatment, (f) materials and/or (g) intensity of development;
 2. is appropriately landscaped, including the retention of appropriate trees and shrubs and the incorporation of public art where relevant;
 3. has any unreasonable effect on the surrounding area by reason of noise and any emissions to land, air, or water, and is not, by reason of its location, itself adversely affected by such conditions as may already be in existence within the neighbourhood;
 4. makes adequate provision for vehicle parking in accordance with the Council's vehicle parking standards;
 5. takes due account of the need to deter crime, both against individuals and against public or private property whilst maintaining an attractive environment; and
 6. takes into consideration important local and strategic views, particularly where the proposed development is one which significantly exceeds the height of its surroundings or is located on a prominent skyline ridge.
- 5.59. **Policy ENV40 (Built Environment)** states that the Council will require applicants to survey sites that are known or suspected to be contaminated to determine the source of any pollutants and any remedial measures necessary to prevent these causing hazards either during construction or through subsequent use of the site.
- 5.60. **Policy ENV42 (Accessible Design)** states that the Council will seek to ensure that all applications for the conversion of existing buildings or premises and the construction of new buildings or premises or the laying out of external areas, to which the public will have access or in which people will be employed, shall make adequate provision for the needs of people with disabilities.
- 5.61. **Policy ENV46 (Conservation Areas)** states that any new development, alterations or extensions to existing buildings or structures within Conservation Areas should preserve or enhance the character or appearance of the area and in order to promote a high standard of design, the following shall apply:
1. other than in exceptional circumstances, outline applications will not be appropriate and all applicants will be expected to indicate clearly how the proposed development relates to surrounding buildings;

2. design guidelines will be produced for each Conservation Area as resources permit;
 3. Planning Briefs and design guides will be produced where appropriate for particularly important or sensitive sites; and
 4. developers will be encouraged to employ the specialist services of qualified professionals.
- 5.62. **Policy T6 (Transport Network)** states the Council will normally refuse any development proposals that would either cause local traffic flows to rise above the design flow for a road or would generate additional traffic on a road on which flows are already considered to exceed design flow, unless:
1. either the affected road is included in an improvement programme that would increase the design flows to a level capable of accepting increased demands from the base flow and the development or the applicant is prepared and in a position to undertake un-programmed road improvements, including traffic management and environmental measures, to increase the design flow capacity of relevant highway links to a level capable of safely accommodating increased demands from the development; and
 2. there are no environmental, or other planning or road traffic objections to such highway improvements taking place.
- 5.63. **Policy T16 (Improvement of the Safety and Convenience of Travel)** states that the Council will seek to improve the environment for pedestrians and reduce the risk of accidents to pedestrians by means of:
1. adequate and safe crossing facilities, where necessary;
 2. giving priority to the needs of pedestrians, including people with disabilities, in highway and landscape design; and
 3. environmental enhancement schemes in areas of high pedestrian activity such as shopping streets.
- 5.64. **Policy T17 (Regulation of Vehicle Parking)** states that applicants should make provision for off-street car parking spaces in their developments, including applications for changes of use, up to the maximum prescribed levels of parking, unless a Transport Assessment of the development indicates the need for higher levels of parking. In the case of smaller developments, the applicant may be required to demonstrate how the travel needs arising from the development will be met in circumstances where there are concerns about the impact of on-street parking on amenity and traffic flow. Parking spaces should be located so as to discourage on-street parking and respect the amenity of near-by residents.

Supplementary Planning Documents and Guidance

- 5.65. The Council has prepared and has adopted a number of Supplementary Planning Documents (SPDs) to provide further guidance on policies set out in Local Plan documents. These include the following:
- > **Planning Obligations Guidance SPD (2008)** – This explains what the Council will seek in planning agreements with developers to ensure contributions to providing local services and facilities.
 - > **The Open Space Strategy and Technical Paper (2008)** – This provides a framework for future planning and management of open spaces.
 - > **The Strategic Flood Risk Assessment (Level 1 and Level 2)** – This considers flood risk in Bexley and the implications for future development.
 - > **The Sustainable Design and Construction Guide SPD (2007)** – This highlights the importance of design and construction in creating a more environmentally friendly and sustainable development.

- > **The Sustainable Drainage Design and Evaluation Guide (2018)** – This links the design of SuDS with the evaluation requirements of planning.

6.0 Planning Considerations

- 6.1. This section considers the potential for a sports development on the Site, against the adopted and emerging policies.

Principle of Development

Community Benefits

- 6.2. Social and economic objectives are two of the three pillars of sustainable development as defined in NPPF Paragraphs 8(a) and (b), whilst promoting healthy communities has its own chapter in the Framework. The proposals would provide a high quality and permanent home for BAHC, creating long-term certainty for the future of the club and constituting a significant enhancement of its status-quo whereby home games are played at a variety of locations across Kent and Southeast London, all disconnected from the current reception facilities. The facilities proposed, on weekday evenings and weekends when not being used by BAHC for either training or match days, would be available for use by local sports clubs, community groups and schools. The applicant has undertaken informal pre-application engagement with BBC parks, sports, open space, leisure and youth development officers, all of whom are in agreement that Bexley is lacking all-weather sports facilities and that Mill Meadows (the Site) is well located to sustain a pitch.
- 6.3. Beyond the obvious social and health benefits linked to the delivery of a high quality sports facility, BAHC has close links to several local businesses and the following benefits have been identified should the club secure its long-term future at the heart of Bexley Village:
- > The Hockey Club has a sponsorship deal with KT Sports in the Village with a number of members using their facilities.
 - > The Baltiser Indian Restaurant is another sponsor and varying team evenings are held there whilst members also use other restaurants in the village.
 - > Hamers and Costa Coffee host Hockey members at the weekends and local members get together in the week.
 - > Bexley pubs are frequented by the membership on a regular basis.
 - > The Club buys from the local bakers and other retail outlets for match teas and peripheral items.
 - > The closer proximity to the village of the new site may enhance the use members already make of the village and its businesses. The new location allows 100% of home games to be played in the centre of Bexley, rather than out of town.

Green Belt

- 6.4. The NPPF and London Plan Policy G2 require that the strongest protection should be given to London's Green Belt, and that inappropriate development should be refused except in very special circumstances. The aims of protecting the Green Belt from inappropriate development are repeated in Policies CS01 and CS17 of the Bexley Core Strategy and saved Policy ENV4 of the Bexley UDP.
- 6.5. Paragraph 145 of the NPPF regards the construction of new buildings as inappropriate development in the Green Belt, with exceptions which include: (b) The provision of appropriate facilities (in connection with a change of use of land) for outdoor sport or outdoor recreation, as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it; and (g) Limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use, which would not have a greater impact on the openness of the Green Belt than the existing development. This approach is reflected in saved Policies ENV4 and ENV8 of the Bexley UDP.

- 6.6. In addition, the NPPF (paragraph 92) states that planning decisions should plan positively for the provision and use of community facilities (e.g. sports venues) and paragraph 96 states that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Furthermore, saved Policy ENV10 of the Bexley UDP encourages recreational uses of a predominantly open nature to locate in suitable parts of the Green Belt.
- 6.7. The northern edge of the Site is occupied by a number of structures associated with the previous equestrian use including areas of hard surfacing. This cluster of development constitutes previously developed land, as established by the Inspector of the planning appeal Ref: APP/D5120/W/19/3226872. The existing stable building is to be renovated and extended to provide changing rooms and a pavilion facility with refuse storage. In addition, a large shed adjacent to the vehicular entrance to the Site is to be refurbished and used for ancillary storage/administration. All of these proposed buildings would be used in connection with the proposed all-weather hockey pitch. All other buildings and structures on the Site, most notably those to the west of the existing stables building, are to be demolished and this floorspace consolidated to form the extension to the stable block.
- 6.8. As a result, the proposed development would comprise the provision of appropriate facilities for outdoor sport, and a redevelopment of previously developed land, which would not have a greater impact on the openness of the Green Belt, in accordance with parts (b) and (g) of paragraph 145 of the NPPF.
- 6.9. In this regard, the only new building is the extension to the existing stable building, which is 60.7sqm in area. Following the demolition of all other non-retained structures on Site, the built footprint would total 247.8sqm, which is less than the current 262.4sqm. The extension element would sit at a lower height (3.4m) than the pavilion (retained brick stable block – 5.5m), whilst there would be no increase in height for the retained shed which is being renovated to provide storage units with club-admin space at first floor level.
- 6.10. As a result, the proposed buildings would be no more visually prominent than the existing buildings on the Site and they would neither be visually detrimental to, nor detract from, the openness of the Green Belt. To the contrary, the appearance of the Green Belt by renovation and removing derelict buildings and the introduction of soft landscaping would be enhanced, whilst the openness of the Green Belt would increase as a result of the extent of built development being brought closer towards Bexley and the existing built-up area. The proposed parking area would not constitute an increase in hardstanding compared to the extant areas of hardstanding.
- 6.11. The all-weather hockey pitch and the training pitch should be considered appropriate development within the Green Belt in accordance with paragraph 145 of the NPPF. This was accepted in the previous appeal decision. In determining the appeal, the Inspector stated that; *'the all-weather pitch itself would not have a volume, and any associated equipment such as goalposts would be relatively limited in scale and amount, appropriate to its use for outdoor recreation, and would not harm the openness of the Green Belt.'*
- 6.12. It is understood that vehicular movements and intensification of use do play a role in the assessment of openness of the Green Belt. The Site's historic use, and indeed its prevailing use class, as stables and recreational equestrian activities, is considered relevant in this instance. Given the number of existing stables and the size of the existing hard standing, there is capacity and likelihood for up to 10 cars to be on Site at any one time. The net increase of approximately 2 car parking spaces is not considered to constitute a significant increase in potential vehicular movements. Furthermore, the car parking areas and their activity will be screened to a certain extent by the existing tree planting; the vast majority of which is marked for retention.
- 6.13. In conclusion, the proposal has been designed to have no additional visual prominence or impact on openness when viewed from within the Green Belt, against a backdrop of existing development. The proposed buildings have been designed to reflect and complement the style and form of surrounding development to create continuity and minimal impact.

- 6.14. In the light of the above, the proposed development accords with NPPF paragraphs 92, 96, 133 & 143-146, London Plan Policies G2 & G4, Core Strategy Policies CS01, CS06 & CS17 and Saved UDP Policies ENV4, ENV8, ENV10 & ENV39.

Design

- 6.15. The re-use or like for like replacement of building materials, together with removal of all other buildings and structures on the Site - many of which are in a dilapidated state - will constitute an improvement to the quality of the built form within the Old Bexley Conservation Area and will have no adverse impact on the locality by virtue of its elevational treatment or materials.
- 6.16. That the extension element to the existing stable block sits lower in height to the main pavilion, the heights of the existing stable block and shed would not be increased, nor would their widths expand, and that a greater quantum of building footprint is being demolished than constructed means that the proposals would not affect neighbours or the street scene by reason of its scale, massing, height, or layout.
- 6.17. In the light of the above, the proposed development accords with NPPF paragraph 217, London Plan Policy D4 and Saved UDP Policies ENV39 & ENV42.

Flood Risk

- 6.18. A Flood Risk Assessment, prepared by Ambiental, has been submitted in support of the application. In summary, it draws the following conclusions:
- > The Site is located in Flood Zones 1, 2 and 3.
 - > The proposed hockey pitches are primarily in Flood Zones 2 and 3, while the proposed pavilion buildings are in Flood Zone 3.
 - > The EA Product 6 dataset indicates that the site is partially affected in the 1:20 year flood extent and is therefore partially in Flood Zone 3b. The proposed pavilion buildings and pitches are partially in Flood Zone 3b. However, as a 'Water Compatible' use, such uses are appropriate in Flood Zone 3b, provided they are designed and constructed to:
 - o remain operational and safe for users in times of flood;
 - o result in no net loss of floodplain storage;
 - o not impede water flows and not increase flood risk elsewhere.
 - > Due to other planning constraints (i.e. the Green Belt) it is not possible to relocate or raise the pavilion buildings above modelled flood levels. It is also important to note that the pavilion buildings will be conversions of the existing buildings on Site. As such, it is recommended that the pavilion buildings are designed to be floodable assets/ allowed to flood should the Site flood, to negate displacement of flood water. This would require single skin construction (similar to the existing structures) with flood grilles around the perimeter to allow flood water to penetrate the structure in the 1:20 year and great events.
 - > It is recommended that the pavilions are closed, and the sports pitches not used upon receipt of a Flood Warning from the EA to mitigate the risk to life. The Site should remain closed until the EA Flood Warning is lifted.
 - > The hockey pitches are to be located on currently sloping land. It is understood that there will be a levels change to create a flat playing surface. As such, and given that the proposed development is for 'Water Compatible' outdoor sports facilities, such uses could be permitted in Flood Zone 3b subject to meeting design requirements. Compensatory Flood Storage could be provided on Site to offset displacement caused by landscaping.

- > Following the guidelines contained within the NPPF, the proposed development could be considered suitable assuming appropriate mitigation (including adequate warning procedures) can be maintained for the lifetime of the development.

6.19. In the light of the above, the proposed development accords with NPPF paragraphs 155, 157-161, & 163-165, London Plan Policies SI 12 & SI 13, and Core Strategy Policy CS06.

Environment

Biodiversity

- 6.20. There are three Sites of Special Scientific Interest (SSSI) and four Local Nature Reserve (LNR) sites within 5km. The Site does not fall within Natural England SSSI Impact Risk Zones that relate to sports-related planning applications.
- 6.21. The Site is within a designated “Area of Metropolitan Importance for Nature Conservation” or SINC, due to the proximity of the River Cray. Bexley’s SINC’s form part of the green infrastructure provision in the borough. Due regard must be given to protecting habitats and species, whilst taking opportunities to enhance them wherever possible.
- 6.22. The Site predominantly consists of a semi-improved grassland field approximately 2.6ha in size, previously used for grazing, with a now overgrown area previously used as a sand school along the western boundary. The River Cray runs the length of the Site’s southern and eastern boundaries. Broadleaved trees line sections of the river on the eastern boundary. Several buildings occupy the north-east corner of the Site, including a brick built stable block, a corrugated stable block, and several other outbuildings which are a mix of timber and corrugated sheeting. Hardstanding, bare ground, ephemeral, and tall ruderal growth is present among the buildings, as are several organic and inorganic refuse piles.
- 6.23. In this context, a Preliminary Ecological Appraisal (PEA), prepared by Southern Ecological Solutions, has been submitted in support of the application. In summary, the PEA demonstrates the following:
- > The Phase 1 survey (which formed part of the PEA) was conducted outside of the optimal survey window, and therefore further botanical surveys have been recommended to assess the semi-improved grassland habitat during optimal survey months.
 - > There is a potential badger sett on Site, therefore sett monitoring surveys should be undertaken to ascertain the level of activity in each of the setts on Site. This should be conducted over a period of 21 days, using infrared cameras placed in front of sett entrances. The results of these surveys would inform mitigation measures if required.
 - > The brick built stable on Site is considered to offer high suitability for roosting bats due to the features present and surrounding suitable habitat on Site and within the wider area. Previous emergence/re-entry surveys were conducted on this building in June-July 2019 and revealed no bats roosting. Updated surveys on the suitable buildings on Site should be conducted. All other buildings were considered to be of negligible suitability for roosting bats.
 - > The Site was considered to have potential to support foraging and commuting bats due to the semi-natural character of habitats present as well as good connectivity to the wider landscape. Therefore, a suite of seasonal bat activity surveys has been recommended.
 - > The Site was considered to have potential to support otter and water vole, due to the presence of the River Cray adjacent to the Site. Presence / likely absence surveys are therefore recommended.
- 6.24. Table 7 of the PEA (reproduced below) sets out a summary of the likely impacts, mitigation and enhancement measures and residual effects:

Feature	Likely Impacts	Further Surveys / Assessments	Likely Mitigation Measures and Enhancements	Likely Residual Effect
SSSI/LNR	No likely impacts	N/A	No mitigation, consultation either Natural England is considered unnecessary due to the scale and nature of proposed development.	Neutral
Habitats	Damage to retained trees and woodland during construction. Loss of woodland on site. Loss of semi-improved grassland field, which may be re-assessed as a higher value habitat post further botanical surveys. Lighting impacts during/post construction.	Botanical survey during optimal survey season (May-July).	Use of Heras fencing around trees, woodland and scrub. Management of remaining grassland around pitches as wildflower meadows. Implementation of wildlife sensitive lighting.	Neutral
Rare and notable flora	Loss of flora, which may be re-assessed as being of higher value post further botanical surveys.	Botanical survey during optimal survey season (May- July).	Retention and protection of rare / notable flora if found.	Neutral
Badger	Possible badger sett on site. Injury/death during construction	Badger sett update survey If present, badger sett monitoring survey undertaken.	If present, provide an assessment report detailing survey results and mitigation measures including precautionary measures during the construction phase to follow.	Neutral
Bats	Loss of roost if present in brick-built stable building (B1). Diminished quality of foraging and commuting habitat if flood lighting is to be included within the proposals.	Emergence/re-entry surveys on B1. Seasonal bat activity surveys if floodlighting included within proposals.	Implementation of wildlife sensitive lighting. Retention of site boundary habitats. Demolition of B1 under a licence from Natural England if bats found to be roosting here. Provision of bat boxes as compensation if roost found, or enhancement if roost not found.	Neutral
Birds	Injury/death of birds and eggs during construction	Breeding bird checks	Works to clear trees or scrub to be undertaken outside of breeding bird season or after an ecologist has confirmed no active nests are present. Provision of bird boxes.	Neutral
Invertebrates	No likely impacts	N/A	Implementation of wildlife sensitive lighting. Relocation of suitable habitat piles to retained habitat. Provision of dead wood for stag beetle and other invertebrates.	Neutral
Reptiles	Risk of Injury/ and or death	N/A	Precautionary methods for vegetation clearance. Exclusion fencing to be erected around the construction area.	Neutral
Notable Mammals	Injury/death during construction for European hedgehog	N/A	Precautionary methods for vegetation clearance. Standard precautionary measures during construction phase.	Neutral

- 6.25. Following the completion of the above further surveys, an Ecological Impact Assessment will be produced which will set out potential impacts and necessary mitigation requirements for protected and priority species.
- 6.26. Through the above enhancement strategies, it is considered that all significant impacts upon biodiversity, including any potential adverse impacts upon specific protected species, habitats and designated sites, will likely be able to be wholly mitigated, or at the very least to an extent that is outweighed by the community benefits of the scheme.
- 6.27. In the light of the above, the proposed development accords with NPPF paragraphs 170 & 175, London Plan Policy G6, Core Strategy Policies CS06, CS08 & CS18 and Saved UDP Policy ENV28.

Trees

- 6.28. A Tree Survey and Arboriculture Impact Assessment (AIA), prepared by Southern Ecology Solutions, has been submitted in support of this application. In summary, the AIA demonstrates that the placement of the pitches

is optimal insofar as minimising the loss of mature or valuable trees, whilst minimal tree removal is needed for the built aspect of the proposals. No trees subject to TPOs are proposed to be removed.

- 6.29. In the light of the above, the proposed development accords with London Plan Policy G7 and Saved UDP Policy ENV35.

Transport and Parking

- 6.30. A Transport Assessment, prepared by Bellamy Roberts, has been submitted in support of this planning application.
- 6.31. In summary, it demonstrates that the proposed parking provision of 12 car parking spaces (including 2 disabled spaces) is more than sufficient for a typical match day or training session, given that a number of players and spectators can reasonably be expected to arrive via train, bus, walking or bike. The proposal would see a pavilion facility placed next to an all-weather pitch, which would be a significant improvement in transport terms on the current situation whereby players travel to the current match venue and then travel again to the pavilion post-match. Use of the pitches by local schools would see pupils arrive on foot or by minibus. On rare occasions such as tournaments or more intense usage of the all-weather pitch than a standard 11 v 11 hockey game, there are an abundance of car parks nearby including the station car park, High Street car park, Thanet Road car park, and the adjacent cricket club.
- 6.32. There is no policy minimum standard for cycle provision in respect of sports pitches and pavilions, however it is considered that the 20 spaces provided is more than sufficient.
- 6.33. In the light of the above, the proposed development accords with NPPF paragraphs 108 & 109, London Plan Policies T4, T5 & T6.4, Core Strategy Policy CS15 and Saved UDP Policies T6, T16 & T17.

Community Infrastructure Levy (CIL)

- 6.34. It is understood that the proposed development would not be liable to CIL owing to the fact that only 60.7sqm of new-build floorspace would be created, which is less than the 100sqm trigger. A CIL Form 1 (additional information) is enclosed which confirms this position.

7.0 Summary and Conclusion

- 7.1. This Planning Statement supports the submission of a full planning application to the London Borough of Bexley (LBB) for:

Renovation and extension of the existing stable block to provide changing rooms and a pavilion facility (Use Class F2(c)), the renovation of the existing large shed to provide ancillary storage at ground level and club-admin space at first floor level, the demolition of all other existing buildings and structures, creation of an all-weather hockey pitch and secondary grass training pitch (Use Class F2(c)), together with associated car and cycle parking, landscaping and associated works.

- 7.2. The northern edge of the Site is occupied by a number of structures associated with the previous equestrian use including areas of hard surfacing. The existing stable building is to be renovated and extended to provide changing rooms and a pavilion facility. In addition, a large shed adjacent to the vehicular entrance to the Site is to be refurbished and used for ancillary storage/administration. All of these proposed buildings would be used in connection with the proposed all-weather hockey pitch. All other buildings on the Site, most notably those to the west of the existing stable building, are to be demolished.
- 7.3. The proposed buildings would, therefore, comprise the provision of appropriate facilities for outdoor sport and the partial redevelopment of previously developed land. In this regard, the only new built development is the extension to the existing stable building to form an enlarged pavilion, and the size of this extension (60.7sqm) is no greater, and is in fact less, than the footprint of the existing buildings further west that are to be demolished. The total footprint post-development will be 247.8sqm which is a reduction on the 262.4sqm at present. The proposed car parking area would sit within, and would be no larger than, the current areas of hardstanding.
- 7.4. As a result, the proposed buildings would be no more visually prominent than the existing buildings on the Site and they would not be visually detrimental and neither would they detract from the openness of the Green Belt. To the contrary, they would improve the appearance of the Green Belt by renovation and removal of derelict buildings, introducing soft landscaping, and enhancing the current hard landscaping. Moreover, there is a case to suggest that the openness of the Green Belt would be increased as a result of the southernmost buildings being lost, and the general spread of built development shifting north-eastwards back towards Bexley. The number of vehicular movements and usage of the proposed car park would not be significantly higher than if the Site was brought back into active use as a stables and equestrian centre, and as such this is not considered to be a material factor in determining the impact on openness.
- 7.5. The all-weather hockey pitch and the training pitch should be considered appropriate development within the Green Belt, in accordance with paragraph 145 of the NPPF.
- 7.6. In conclusion, the proposal been designed to have no additional visual prominence or impact on openness when viewed from within the Green Belt, against a backdrop of existing development. The proposed buildings have been designed to reflect and complement the style and form of surrounding development to create continuity and minimal impact.
- 7.7. The proposed pitches are located primarily in Flood Zones 2 and 3 and the proposed buildings are in Flood Zone 3. Both are partially in Flood Zone 3b. However, as a 'water compatible' use, they are appropriate in Flood Zone 3b, provided they are designed and constructed to: remain operational and safe for users in times of flood; result in no net loss of floodplain storage; and not impede water flows and not increase flood risk elsewhere. In this regard, the buildings are designed to be floodable assets/ allowed to flood should the site flood, to negate displacement of flood water. Whilst the hockey pitches will require level changes to create a flat playing surface, adequate compensatory flood storage could be provided on Site to offset any displacement caused.

- 7.8. Habitat enhancement would be required as part of the wider Site to offset the loss of grassland as a result of the proposed pitches. Whilst the PEA identified the potential for the Site to accommodate a number of protected species, any potential adverse impacts will likely be able to be wholly mitigated.
- 7.9. The siting of the proposed pitches results in no loss, nor impact to any mature trees of value, whilst the built element of the scheme and access/parking area only sees a couple of small trees of low value removed, thus is considered acceptable in arboricultural terms. None of the trees subject to TPOs are proposed to be removed.
- 7.10. In transport terms the provision of 12 car parking spaces and cycle spaces is considered proficient given the number of players that can be reasonably expected to reach the ground via train, bus, walking, or school minibus for a typical match day or training session, whilst an abundance of other parking opportunities exist around the Site to cater for exceptional circumstances.
- 7.11. Overall, it is concluded that this submission meets or exceeds the planning policy requirements set out in the NPPF, the London Plan and LBB's Core Strategy and the saved policies of the Unitary Development Plan.
- 7.12. As a result, we would respectfully request that planning permission should be granted without delay.



BP
TWW