PROJECT INFORMATION

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QUALITY INFORMATION

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INTRODUCTION AND PURPOSE OF DOCUMENT
1. Introduction and Purpose of Document

1.1 Introduction

1.1.1 This Planning Statement has been prepared by AECOM on behalf of the London Borough of Bromley (‘The Applicant’) and accompanies an outline planning application including means of access, with all other matters reserved for consideration at a later date, seeking planning permission for a park-wide regeneration scheme with enabling development at Crystal Palace Park, Thicket Road, London.

1.1.2 The application is submitted to the London Borough of Bromley as the determining local planning authority (LPA) under the Town and Country Planning Act 1990 (as amended) and the Town and Country Planning (Development Management Procedure) Order 2015.

1.1.3 The London Borough of Bromley is the freehold landowner of Crystal Palace Park.

1.1.4 The application seeks outline planning permission with all matters reserved with the exception of some means of access, for the:

“Outline application with all matters reserved except highways access for comprehensive phased regeneration of Crystal Palace Park. This will include: conservation and repair of heritage assets; removal of existing hard surfaces; alterations to ground levels and tree removal; landscaping including planting of new trees; demolition of existing buildings and structures; creation of new pedestrian paths / vehicular access roads / car, coach and cycle parking; changes of use including part of the caravan site to part public open space and part residential; erection of new buildings and structures comprising: up to 2300sqm for a cultural venue (Use Class D2), up to 530sqm of park maintenance facilities (Sui Generis) including the dismantling and reconstruction of existing maintenance depot; up to 150sqm information centre (Use Class D1); up to 670sqm for a community centre (Use Class D1); up to 737sqm of educational institution at the Capel Manor College Anerley Hill Site (Use Class D1), and up to 3779sqm of educational institution at the Capel Manor College Farm Site (Use Class D1) of which 3399sqm comprises educational buildings and 380sqm comprises ancillary shelters/ outbuildings; and up to 18,847sqm of residential (Use Class C3) accommodation to provide up to 210 residential dwellings, together with associated and ancillary works including utilities and surface water drainage, plant and equipment. Full planning permission is sought for alteration to highways access at Anerley Hill Gate entrance, Penge Gate car park, Old Cople Lane (Rockhills Gate), Sydenham Gate car park and the creation of three additional accesses for the residential development at Rockhills and Sydenham Villas.”

1.2 Purpose of the Planning Statement

1.2.1 This Planning Statement is submitted to assess the application proposals for the Proposed Development against the requirements of national, strategic and local planning policies. A description of the Proposed Development is provided within Section 4 of this document, and also contained within the Development Specification and Framework (DSF) which is submitted for approval as part of this planning application.

1.2.2 It is anticipated that a condition will be imposed upon the planning permission requiring future Reserved Matters Applications (RMAs) and other applications for approval of details, to be in accordance with the approved Development Specification and Framework.

1.3 Structure of the Document

1.3.1 This Planning Statement is structured as follows.

− **Section 1. Introduction and Purpose of Document**: This section sets out the purpose of the Planning Statement.

− **Section 2. The Planning Application Site**: This section provides a description of the
application site.

- **Section 3. Planning History**: This section provides an overview of relevant planning applications.

- **Section 4. The Proposed Development**: This section sets out the description of development for which outline planning permission is sought within the Application.

- **Section 5. Overview of Planning Application**: This section explains the documents and plans that are being submitted alongside this planning statement.

- **Section 6. Planning Policy Context**: This section identifies the relevant national, regional and local policy context for the Proposed Development. It outlines those statutory planning policies and material conditions relevant to the application.

- **Section 7. Planning Policy response**: This section provides a thematic response of the Proposed Development against the planning context outlined in Section 5.

- **Section 8. Planning Balance**: This section provides a final summary of the benefits of the Proposed Development.

### 1.4 Environment Statement

1.4.1 The planning application is accompanied by an Environmental Statement (ES) which reports the findings of an Environmental Impact Assessment (EIA). The ES has been prepared in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and in accordance with the agreed scope for the ES, as set out in the Scoping Opinion issued by LBB dated 2nd March 2018. It comprises:

- **Environmental Statement: Non-Technical Summary.** This is provided as a separate document, providing a concise description of the Proposed Development, alternatives considered, potential environmental effects and mitigation measures.

- **Environmental Statement Volume I: Main Report.** This document forms the main body of the Environmental Statement, detailing the results of the environmental assessments, likely significant effects arising from the Proposed Development and the proposed mitigation measures. The ES is divided into a number of background and technical chapters supported with figures and tabular information. Each environmental topic has been assigned a separate technical chapter in the ES as follows:

  - Section 1: Introduction
  - Section2: EIA Methodology
  - Section3: Alternatives and Design Evolution
  - Section 4: The Proposed Development
  - Section 5: Air Quality
  - Section 6: Cultural Heritage
  - Section 7: Ecology and Biodiversity
  - Section 8: Ground Conditions and Contaminated Land
  - Section 9: Noise and Vibration
  - Section 10: Socio-Economics
  - Section 11: Townscape and Visual Impact Assessment
  - Section 12: Traffic and Transport
  - Section 13: Cumulative Effects
  - Section 14: Residual Effects and Conclusions

- **Environmental Statement Volume II: Technical Appendices.** A complete set of appendices is provided for reference. These comprise background data, technical reports, tables, figures and surveys which support the assessments in ES Volume I. The appendices provided are as follows:

  - Appendix 1-A: EIA Statement of Competence
  - Appendix 2-A: EIA Screening Letter and Screening Opinion
  - Appendix 2-B: EIA Scoping Report and Scoping Opinion
  - Appendix 2-C: Climate Statement
  - Appendix 3-A: 2017 Regeneration Plan Options Appraisal Layout Plans
  - Appendix 4-A: Planning Drawings
  - Appendix 5-A: Air Quality Assessment Methodology
  - Appendix 5-B: Air Quality Model Verification
  - Appendix 6-A: Cultural Heritage Desk Based Assessment
  - Appendix 7-A: Ecology Envirocheck Report
  - Appendix 7-B: Arboricultural Impact Assessment
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THE SITE AND SURROUNDINGS
2. **The Site and Surroundings**

2.1 **Application Site Boundary**

2.1.1 The Crystal Palace Park (CPP) Planning Application boundary, identified in Figure 2.1 below, covers 77.76 hectares. The application site covers an area bounded by Crystal Palace Park Parade to the west, Crystal Park Road and Westwood Hill to the north, Thicket Road to the southwest and Crystal Palace Station, Ledrington Road and Anerley Hill to the south.

2.1.2 The application site boundary has been drawn to encompass the entire park and landscaping, built development, infrastructure and related facilities for which outline planning permission is sought. The boundary excludes the land leased by the Greater London Authority (GLA) for use by the National Sports Centre (NSC), but includes land occupied by Capel Manor College (CMC).

2.1.3 The application site is located entirely within the administrative area of the London Borough of Bromley, but close to the boundaries of four other London Boroughs: the London Borough of Lewisham, the London Borough of Southwark, the London Borough of Lambeth and the London Borough of Croydon.

2.1.4 Figure 2.2 on the following page shows the location of the boundaries of these Boroughs within the vicinity of the application site.

2.1.5 The London Borough of Lewisham is located to the north of CPP; bordering CPP’s north-eastern edge. The London Borough of Southwark is located to the west of CPP and borders the western edge of CPP along Crystal Palace Parade. The boundary of the London Borough of Lambeth is located to the west of CPP, south of...
2.2 Site Description

2.2.1 Crystal Palace Park (CPP) is located in south London, centred at National Grid Reference 534300, 170900. The Park is one of the largest in south east London at approximately 78 hectares (ha) in area. It is enclosed by Crystal Palace Parade to the west, Anerley Hill to the south, Crystal Palace Park Road to the north and Thicket Road to the east. The Park is bounded by residential development on its north eastern and southern sides. Crystal Palace Station and railway tracks are located just outside the southern boundary and Crystal Palace Bus Station is located on the western boundary. CPP is recognised as a Regional Park due to its size and location, serving several surrounding boroughs and providing significant assets, including the National Sports Centre (NSC); it is also a Grade II* listed Historic Park and Garden.

2.2.2 CPP is located along the highest section of the London clay ridge which marks the southern edge of the London Basin. It falls steeply down from the west towards the east, from approximately 109m AOD adjacent to Crystal Palace Parade to 52m AOD at Penge Gate.

2.2.3 The Park appears as a large area of green landscape, well wooded towards its edges, particularly the north. It is also well wooded to the east, forming a backdrop to the sports buildings and associated facilities. It consists of open grassland and mature and semi-mature trees, with pathways, access roads, car parking areas, buildings, and structures relating to park maintenance, sport, and recreation facilities.

2.2.4 CPP consists of the elevated and open site of the former Crystal Palace, the terraces and wide central walk, open parkland and paths, access roads and car parks. There are numerous buildings and structures related to park maintenance, sport and recreation facilities with CPP, but some of these are located outside the planning application boundary.

2.2.5 The buildings and structures that are located within the Park and the planning application boundary include the Grade II listed Italian Terraces which step down from the hill top site, parallel to Crystal Palace Parade; and most of the Paxton Axis, which runs centrally from the top site through the entire Park, to the eastern

Figure 2.2: Location of Crystal Palace Park in relation to London Borough boundaries

Source: London Borough of Southwark, AECOM
edge of the Park at Penge Gate.

2.2.6 Some of the buildings and structures of note that are located within the Park but are outside the planning application boundary are: The Grade II* listed National Sports Centre (NSC) and locally listed athletics stadium.

2.3 Surrounding Context

2.3.1 The Park is located in a predominantly residential area, with housing close by on all sides. The surrounding areas have a suburban character, particularly to the north, with large arts and crafts villas on Crystal Palace Park Road, some built on the periphery of the Park. There are several estates of smaller houses close to the Park. The surrounding area also includes some retail and office uses, and a number of primary schools.

2.3.2 The Upper Norwood ‘Triangle’ located at the south western corner of the Park is the closest centre to the Park and has its own distinct independent character providing a number of services, retail and food and drink offers with a high number of independent stores. A few services are also centred around Penge West train station directly to the east of the site.

2.4 Land Owningships

2.4.1 The London Borough of Bromley are the freehold landowner of CPP; however, they lease a number of areas to other organisations. Figure 2.3 below identifies the leaseholder and the extent of their interest within the application site; this is also listed below:

- **Caravan Club Ltd.** – leases an area of 2.43ha in the northwest corner of CPP. This is currently used as caravan site and is not publicly accessible.

- **Crystal Palace Angling Association** – leases use of the Intermediate Lake in the northern part of the site.

- **St. John Ambulance** – leases a building measuring 161sqm in the northeast corner of CPP between Sydenham Gate and Penge Gate and buildings in the centre of the Park within the Transitional Landscape.

- **The Greater London Authority / Capel Manor College** – leases approximately 1.28ha on the

![Figure 2.3: Extent of Leases within Crystal Palace Park](source: AECOM)
2.4.6 **The Greater London Authority / National Sports Centre** – leases an extensive area in the centre of CPP for sports facilities. While this is within CPP, it is located outside the application site.

2.4.7 **The Crystal Palace Museum Trust** – leases an area in the southwest corner of CPP, which lies within the application boundary.

2.4.8 **Arqiva** – leases an area in the northwest corner of CPP where the North Tower Crystal Palace Transmitter is located.

2.4.9 **Thames Water Utilities** – leases an area in the northwest corner of the site adjacent to the Caravan Club Ltd land.

2.4.10 **London Electricity** also has substations and infrastructure within CPP which lie within the boundary of the application site.

### 2.5 History of the Park

2.5.1 Following the Hyde Park Great Exhibition of 1851, the Crystal Palace was re-erected in south London in expanded form and the Park opened in 1854 to the designs of Sir Joseph Paxton. The Palace dominated the tree lined ridge, was visible from many viewpoints all over London and beyond, and became a popular venue for meetings, concerts and circuses.

2.5.2 The Palace was destroyed by fire in 1936. During World War II, the Park deteriorated as the hill top site of the Palace was used as a dump for bombsite rubble. In the 1960s the National Sports Centre, athletics stadium and associated buildings were built as part of a masterplan commissioned by the London County Council. However, the full masterplan, including exhibition halls on the Italian Terraces, was not completed.

2.5.3 Historically the Park has been associated with sporting activity. An archery ground formed part of the original Park and a cricket ground was incorporated in 1857. Cycling, polo and football were prominent in the 1890s. A motor racing circuit was laid out in the 1920s, making use of the natural contours of the Park, and continued in use until 1972.

2.6 **Current condition of the Park**

2.6.1 The Park has undergone substantial change and re-development since it was first laid out in the middle of the 19th century. Many of the original features of the Park have been lost, whilst much of those that remain have been neglected and are in a state of disrepair. Over time, the phased interventions to renew and restore the Park combined with the introduction of the NSC and its ancillary features, has resulted in a significantly fragmented landscape.

The gateways to the Park are, relatively ill-defined and give little sense of arrival. In particular Crystal Palace Parade, where the original primary entrance to the Crystal Palace was located, does not provide an entrance into the Park.

The central area of the Park includes many buildings, structures, walkways, areas of car parking and means of enclosure which fragment the landscape. In addition, the views within the Park are currently spoilt, which undermines the concept of the 19th Century design and obscures legibility for users. Furthermore, there is no logical way to read the hierarchy of paths. The pedestrian and cycle routes through and around the Park are substandard with little or no provision for those with restricted mobility, particularly in light of the significant changes in levels. Furthermore, 2.43ha of the Park is currently occupied by the Caravan Club and is not publicly accessible.

Historic England maintains a register of historic sites to identify those that are at risk as a result of damage, neglect, decay or inappropriate development. This register records and assesses the condition, vulnerability and risk for heritage assets and assigns them with a priority for safeguarding. This allows Historic England to focus grant aid funding at the most at-risk features or sites. The Grade II* Crystal Palace Park as a whole, the Grade II* Crystal Palace Pedestrian Subway (southern end within the application site), the Upper and Lower Terrace of the Crystal Palace Garden and the north and south railings, walls and boundary marker at Crystal Palace Park Parade are all entries on the Heritage at Risk Register.

### 2.7 Town Planning Designations

2.7.1 The following section provides a summary of
the relevant town planning designations within
the application site and the surrounding area.
More detailed information is provided in the
relevant technical chapters of the
Environmental Statement, accompanying the
planning application.

2.7.2 It should also be noted that three Acts of
Parliament affect the Park:
− The Crystal Palace Act 1914, provisions saved
  by the 1951 Act;
− The London County Council (Crystal Palace) Act
  1951; and
− The Bromley London Borough Council (Crystal

2.7.3 The overriding purpose of these Acts is to
ensure that the land is held in place for
education and recreation and for the promotion
of industry, commerce and art. The Acts also
restrict certain uses and restrict the ability to
sell, exchange, let or mortgage parts of the Park.

2.7.4 A number of significant policy designations
apply within the planning application site.
These are identified within the statutory
development plan which comprises the London
Plan (2016) and the adopted London Borough of
Bromley Local Plan (2019).

Crystal Palace Park is identified in the adopted
London Plan (Policy 2.1.6) and the Bromley
Local Plan (Policy 111) as a Strategic Outer
London Development Centre. This designation
reflects that the location has strategic assets
that are of more than sub-regional importance
which already generate or could potentially
generate growth within the Crystal Palace area
above the outer London trend. The London Plan
indicates that these assets relate to leisure,
tourism, arts, culture and sports. The
designated area includes the application site as
well as the National Sports Centre leased by the
GLA which lies inside the Park, but outside the
application boundary.

Metropolitan Open Land

2.7.6 Most of the application site is designated as
Metropolitan Open Land (MOL), as illustrated in
Figure 2.4.

Figure 2.4: Extent of Metropolitan Open Land within Crystal Palace Park

Source: London Borough of Bromley Interactive Local Plan Map
Built Heritage

2.7.7 The entire application site is registered under the Historic Buildings and Ancient Monuments Act 1953 within the Register of Historic Parks and Gardens held by English Heritage for its special historic interest, see Figure 2.5 below.

2.7.8 The majority of the application site is located within the Crystal Palace Conservation Area; however, the top of the application site (the Upper and Lower Palace Terraces) is outside the boundary of the Crystal Palace Conservation Area, as illustrated in Figure 2.6, on the following page.

2.7.9 In addition, four conservation areas are located to the south west and east of the application site: The Belvedere Road Conservation Area and Penge High Street Area within the London Borough of Bromley (as shown on Figure 2.6), the Westow Hill Conservation Area (within the London Borough of Lambeth), and the Upper Norwood Conservation Area (within London Borough of Croydon).

2.7.10 The listed buildings within the application site include:
- The Prehistoric animal sculptures, Geological Formations and Lead Mine (Grade I listed, NHLE number 1067798);
- The Upper and Lower Italian Terraces (Grade II listed, NHLE number 1064352);
- The Bust of Sir Joseph Paxton (Grade II listed, NHLE number 1389535);
- The Gate Piers to Rockhills (Grade II listed, NHLE number 1376636);
- The Royal Navy Volunteer Trophy (Grade II listed, NHLE number 1400245); and
- The Gorilla Statue (Grade II listed, NHLE number 1431362).

2.7.11 The eastern exit of the Crystal Palace Pedestrian Subway, which lies under Crystal Palace Parade, is Grade II* listed (NHLE number 1385457) and falls within the application site. The subway itself, which extends under Crystal Palace Parade and exits on the western side of Crystal Palace Parade, is not within the application site.

2.7.12 Other listed buildings near to, but not within, the application site include:
- The National Sports Centre (Grade II* listed, NHLE number 1031539);
- Crystal Palace Lower Level Station (Grade II listed, NHLE number 1064353);
- Sunnydene, 108 Westwood Hill (Grade II listed,
REGENERATION PLAN
Prepared for: London Borough of Bromley

Figure 2.6: Extent of Conservation Areas within the vicinity of Crystal Palace Park

Source: London Borough of Bromley Interactive Local Plan Map

2.7.13 Locally listed buildings within the Application Site include:
- The Base of Brunel’s Water Towers;
- The Paxton Basin;
- Crystal Palace School of Practical Engineering.

2.7.14 Other locally listed buildings near to, but not within, the application site include:
- The Athletics Stadium including the Jubilee Stand;
- The NSC Hostel Tower; and
- 1-6 Ledrington Road, Staff accommodation Building on Ledrington Road and the Lodge.

2.7.15 Further information on these is provided in Chapter 7 of the Environmental Statement, and also in the Heritage Statement which accompanies the planning application.

Ecology
2.7.17 Much of the application site is a Site of Important Nature Conservation. More information on this is provided in Chapter 8 of the Environmental Statement.

Flood Risk
2.7.18 The Application Site is located wholly within an area considered to be Flood Zone 1 (i.e. land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding). A stand-alone Flood Risk Assessment and Outline Drainage Strategy has been prepared in consultation with the Environment Agency and is submitted in support of this application.

Archaeology
2.7.16 The majority of the application site is designated as an ‘Archaeological Priority Area’. More information on this is provided in Chapter 7 of the Environmental Statement.
3. Planning History

3.1.1 There is a long-held desire from all stakeholders to bring regeneration to CPP. Since 1986 there have been a number of attempts reflected in a number of planning applications; however, none of these have been successful.

3.1.2 Table 3.1 below sets out the relevant planning history for the Application Site.

<table>
<thead>
<tr>
<th>Reference</th>
<th>Address</th>
<th>Description</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>19/03578/FULL1</td>
<td>Crystal Palace Park, Thicket Rd.</td>
<td>Construction of a footbridge in Crystal Palace Park for access to the Crystal Palace Dinosaurs on Dinosaur Island. This is also subject to Listed Building Consent Reference 19/03579/LBC, awaiting decision.</td>
<td>Submitted Aug 2019. Awaiting Decision.</td>
</tr>
<tr>
<td>15/03106/AMD</td>
<td>Crystal Palace Park Café, Crystal Palace Park, Thicket Rd.</td>
<td>Change in external lighting from recessed floor mounted spotlights to wall mounted LED light fittings; reduction in height of building; omission of bat box replaced with render finish; glazing reduced on lakeside path elevation; projecting bay window replaced with flush window at first floor; external galvanised steel rainwater pipes and hoppers; change in internal floor finishes; change in external floor finishes.</td>
<td>Permitted. October 2017.</td>
</tr>
<tr>
<td>15/04121/LBC</td>
<td>Crystal Palace Park, Thicket Rd.</td>
<td>Repairs to granite steps and sphinxes to include repainting of the statues.</td>
<td>Permitted. December 2015.</td>
</tr>
<tr>
<td>15/03106/FULL1</td>
<td>Crystal Palace Café, Crystal Palace Park, Thicket Rd.</td>
<td>Demolition of existing single storey cafe and terrace and erection of two storey building comprising cafe on ground floor and cafe/ event space on first floor; external ground and first floor terraces and construction of connecting bridge from first floor terrace to lakeside path.</td>
<td>Permitted. November 2015.</td>
</tr>
<tr>
<td>07/03897/OUT</td>
<td>Crystal Palace Park, Thicket Rd.</td>
<td>Comprehensive phased scheme for landscaping and improvement of Park comprising demolition of and alterations to existing buildings and structures including removal of existing hard surfaces; changes of use including of part of the caravan site to public open space and museum to park rangers base; erection of new buildings and structures for various uses including museum/ park maintenance facilities/ community facility/ information kiosk/ greenhouses/ retail kiosks/ cafes/ toilets/ classroom/</td>
<td>Allowed at Appeal December 2010.</td>
</tr>
</tbody>
</table>
### REGENERATION PLAN
Prepared for: London Borough of Bromley

<table>
<thead>
<tr>
<th>Application Number</th>
<th>Location</th>
<th>Description</th>
<th>Outcome</th>
</tr>
</thead>
<tbody>
<tr>
<td>07/00665/FULL1</td>
<td>Crystal Palace Park, Thicket Rd.</td>
<td>Greenhouse and elevational alterations to main farm building and lower and upper stables/ replacement 2.5m high metal boundary railings and gates and replacement 3m high metal entrance gates.</td>
<td>Permitted. May 2007.</td>
</tr>
<tr>
<td>06/02534/FULL3</td>
<td>Crystal Palace Park, Thicket Rd.</td>
<td>Change of use of land and buildings at children’s farm to educational use (Class D1)/single storey detached classroom building/elevational alterations to existing buildings/2.5m high metal fencing</td>
<td>Refused. September 2006.</td>
</tr>
</tbody>
</table>

3.1.3 In the 1960s the National Sports Centre was built in the centre of Crystal Palace Park, opening in 1964. Built to the designs of the LCC, it was one of the first purpose-built sports centres in the UK.

3.1.4 In the 1990s various planning applications were submitted for comprehensive park improvements across CPP as a whole (98/03352, 99/00001, 99/00002) and were permitted in 1999. The proposals were part implemented (car parking, the maintenance compound and the farm).

3.1.5 Reflective of the desire to regenerate CPP various applications for commercial development at the Terraces end of the site have been submitted and approved, the most recent being reference 00/01986 which sought planning permission for:

   “Multi-screen cinema, other leisure uses and Class A3 uses”

3.1.6 Planning permission was granted for this development, but it was hugely contentious and was not implemented.

3.1.7 The 2007 Masterplan, planning reference 07/03897/OUT, is the most notable application submitted on the site recently.

3.1.8 Planning permission was granted on the 13th December 2010 and this planning permission is extant. The Masterplan was funded by the London Development Agency after they took a long (125) year lease on the NSC and surrounding land to try and bring complete regeneration to the Park. The proposals were costed at £67m in 2007 which is approximately £100m today. Although broadly supported by the community and other stakeholders, funds for delivery were not identified and are unlikely ever to be available. It is, however, still a valuable framework for regeneration and was subject to a significant amount of consultation. The 2007 masterplan formed the basis for the current Regeneration Plan, which has sought to establish a deliverable scheme taking forward the key aspirations identified in the 2007 plan where this is achievable.
THE PROPOSED DEVELOPMENT
4. The Proposed Development

4.1 Introduction

4.1.1 This section provides a description of the Proposed Development for which planning permission is sought. This section is based upon the information provided in the Development Specification and Framework (DSF) and the Parameter Plans, both of which are submitted for approval. Outline planning permission, including means of access, is sought.

4.1.2 The Parameter Plans set out the physical parameters for the Proposed Development for which planning permission is sought and provide sufficient detail to allow a robust approach to the EIA for an outline planning application, in accordance with established practice and case law. Some of the parameters are defined within identified limits of deviation, provided by minimum and maximum parameter lines in order to provide flexibility in how the Proposed Development is taken forward.

4.1.3 Listed Building Consent applications will be submitted alongside the Reserved Matters Applications in due course.

4.1.4 The Parameter Plans which are submitted for approval are set out following the short form description of the Proposed Development below.

4.1.5 It is anticipated that the approval of an outline planning permission would include conditions requiring Reserved Matters Applications (RMA) to be in accordance with the Parameter Plans and the Development Specification and Framework (DSF). A planning condition may also seek Reserved Matters Proposals to be in accordance with Design Principles included within the Design and Access Statement.

4.1.6 Based upon these parameters, an Illustrative Regeneration Plan has been prepared. The Illustrative Regeneration Plan is included as part of the DAS and as an illustrative plan (drawing number: 60553431-DWG-LA-001), submitted in support of this planning application.

4.1.7 The Illustrative Regeneration Plan shows one way in which the Proposed Development could come forward in accordance with the parameter plans and the DSF and is not submitted for approval.

4.2 Scheme for Assessment

4.2.1 The short form description of the development for which outline planning permission is sought is set out below.

“Outline application with all matters reserved except highways access for comprehensive phased regeneration of Crystal Palace Park. This will include: conservation and repair of heritage assets; removal of existing hard surfaces; alterations to ground levels and tree removal; landscaping including planting of new trees; demolition of existing buildings and structures; creation of new pedestrian paths / vehicular access roads / car, coach and cycle parking; changes of use including part of the caravan site to part public open space and part residential; erection of new buildings and structures comprising: up to 2300sqm for a cultural venue (Use Class D2), up to 530sqm of park maintenance facilities (Sui Generis) including the dismantling and reconstruction of existing maintenance depot; up to 150sqm an information centre (Use Class D1); up to 670sqm for a community centre (Use Class D1); up to 737sqm of educational institution at the Capel Manor College Anerley Hill Site (Use Class D1), and up to 3779sqm of educational institution at the Capel Manor College Farm Site (Use Class D1) of which 3399sqm comprises educational buildings and 380sqm comprises ancillary shelters/outbuildings; and up to 18,847sqm of residential (Use Class C3) accommodation to provide up to 210 residential dwellings, together with associated and ancillary works including utilities and surface water drainage, plant and equipment. Full planning permission is sought for alteration to highways access at Anerley Hill Gate entrance, Penge Gate car park, Old Copie Lane (Rockhills Gate), Sydenham Gate car park and the creation of three additional accesses for the residential development at Rockhills and Sydenham Villas”.

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4.2.2 The tables in the following section, Chapter 5, set out the documents and plans that are submitted for approval, as well as those documents and plans submitted in support of the planning application. Further information on these plans, and the documents and plans submitted in support of the application but not for approval, are contained in the Development Specification and Framework (DSF).

4.2.3 The DSF explains the proposed development. However, the long form description of development is set out below:

- **Conservation and repair of heritage assets** including:
  - The Upper and Lower Italian Terrace walls;
  - The Bust of Sir Joseph Paxton;
  - The Gatepierks to Rockhills;
  - The North and South Railings and Walls, Crystal Palace Parade;
  - The Prehistoric Animal Structures;
  - A section of the Crystal Palace basement wall (Paxton Tunnel Wall); and
  - The Colonnade Wall.

- **Landscape improvements** including: removal of clutter, redundant fencing, etc.; improvements to pedestrian routes; enhancement of habitat diversity; restoration of historic views and the central park axis; re-establishment of parkland and associated landscape;

- **Earthworks** to re-profile the landscape on the Upper and Lower Palace Terraces, to create gardens on the Upper Palace Terrace and install utilities infrastructure (for temporary use) on the Lower Palace Terrace to support events on the Italian Terraces; landscaping to the Italian Terraces and installation of utilities infrastructure to create 3.8 hectare event space and earthworks to re-profile landscape in the Transitional Landscape area;

- **Full and partial removal of hard surfaces** including: car/coach parking areas within the Transitional Landscape area, comprising a net removal of 201 car parking and 11 coach parking spaces; removal of existing playground within the Cricket Ground area to be replaced by two new playgrounds within Tidal Lakes area and English Landscape area;

- **Installation of wayfinding signs** and low energy lighting on footpaths; surface water drainage systems and benches;

- **Change of use of Caravan Site** to part public open space and part residential;

- **Dismantling and reconstruction of Crystal Palace Park Road Ranger's Maintenance Building** (up to 530 sqm) to be located beside Sydenham Gate;

- **Alteration to highways access** at Anerley Hill Gate entrance, Penge Gate car park, Old Cople Lane (Rockhills Gate), Sydenham Gate car park;

- **Creation of 3 additional accesses** for the residential elements at Rockhills and Sydenham;

- **Improvements to highway, pedestrian and cycle access points** at Penge Gate, Sydenham Gate Norwood Gate and Anerley Hill;

- **Modification of public car and coach parking areas** to provide 136 car parking spaces and 10 coach spaces, including:
  - The provision of 47 new car parking spaces at Rockhills Gate, including 4 accessible;
  - The re-provision of 10 coach parking spaces at Rockhills Gate;
  - The removal of 15 car parking spaces at Sydenham Gate to provide 55 car parking spaces, including 4 accessible;
  - The removal of 10 car parking spaces at Penge Gate to provide 23 car parking spaces, including 2 accessible;
  - The retention of 4 car parking spaces at Crystal Palace Museum; and
  - The provision of one new accessible car parking space at the Cultural Venue.

**The construction of the following new buildings:**

- A cultural venue (Use Class D2) with viewing platform comprising up to 2300sqm, together with the change of use of the eastern end of the Crystal Palace subway to museum / interpretation centre (Use Class D1);

- A Community Centre (Use Class D1) of up to 670sqm at ‘Rockhills’;

- A 150sqm information centre (Use Class D1);

- Up to 737sqm of educational institution at the Capel Manor College Anerley Hill Site (Use Class D1), and up to 3779sqm of educational institution at the Capel Manor College Farm Site (Use Class D1) of which 3399sqm comprises educational buildings and 380sqm comprises ancillary shelters/outbuildings;

- Up to 210 residential dwellings in 8 buildings up to a total of 18,847sqm comprising:
  - ‘Rockhills’ – 140 permanent residential dwellings (Use Class C3) in 2 blocks of up to 12,150sqm with a maximum of 5 storeys together with 84 car parking spaces
inclusive of 10 disabled spaces, 252 long stay bicycle parking spaces and 18 short stay bicycle parking spaces; and
- Sydenham — 70 permanent residential dwellings (Use Class C3) in 6 blocks of up to 6,697sqm with a maximum of 4 storeys together with 43 car parking spaces inclusive of 4 disabled spaces, 128 long stay bicycle parking spaces and 8 short stay bicycle parking spaces.

- Demolition of the following structures / features within the Park:
  - Nursery near Sydenham Gate;
  - Rangers’ Lodge near Sydenham Gate;
  - St Johns Ambulance building on Crystal Palace Park Road;
  - St Johns Ambulance facility and associated storage buildings in Transitional Landscape area;
  - Buildings at Caravan Club;
  - Maintenance shed east of Crystal Palace Museum;
  - Park Depot near NSC;
  - Crystal Palace Park Information Centre;
  - Existing Capel Manor College buildings and hard surfacing;
  - Four substations (2 adjacent to Penge Gate, one in the Transitional Landscape, and one on the Lower Palace Terrace);
  - Breaking up of surface car parking/areas of hardstanding.

Construction Phase
4.2.4 It is envisaged that the Proposed Development will be constructed in four phases with a number of projects within each phase. These are set out in Chapter 4 of the Environmental Statement, along with further details on hours of work within the construction period and details on traffic management. In terms of traffic, it is anticipated that construction traffic flows will generally take place out of peak hours when congestion on the local road network is lower. A Construction Logistics Plan (CLP) will be produced by the Principal Contractor for both the Park and the Capel Manor College development schemes during detailed design and will be implemented as agreed with the London Borough of Bromley. This will include a framework for the management of construction vehicle movements to and from the site.

4.2.5 A Construction and Environmental Management Plan will be prepared by the Principal Contractor prior to the start of construction works in each Phase and will be implemented as agreed with the London Borough of Bromley. This will provide an overarching strategic framework for the management of environmental effects and the implementation of measures prior to, and during, the demolition and construction phase of the Proposed Development. Further information is set out in Chapter 4 of the Environmental Statement.

Operational Phase
4.2.6 The Proposed Development is intended to make the Park more attractive for visitors, provide new events space and secure the Park’s long-term future. This will give rise to various effects in the local area which are considered in the Environmental Statement accompanying the planning application. The Proposed Development will also give rise to a new residential population; the associated effects of such a population are taken into account in the EIA where relevant. This is particularly pertinent in terms of travel to and from the Application Site. The assumptions made about such activity are reported in the Transport Assessment (TA) which accompanies the planning application. The Socio-Economic chapter of the ES chapter 10, also sets out the expected changes to the local population of Crystal Palace as a result of the Proposed Development.
OVERVIEW OF PLANNING APPLICATION
5. Overview of Planning Application

5.1 Introduction

5.1.1 This section sets out the documents and plans that are being submitted to the London Borough of Bromley alongside this Planning Statement; either for approval, or in support of the application. Further information on these documents and plans can be found in the Development Specification and Framework.

5.2 Documents for Approval

Table 5.1: Application documents for approval

<table>
<thead>
<tr>
<th>Document title</th>
<th>Document reference</th>
<th>Document Status</th>
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<tbody>
<tr>
<td>Completed planning application form and relevant notices</td>
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<td>For approval</td>
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<tr>
<td>Development Specification and Framework</td>
<td>60553431-REP-PL-003</td>
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Source: AECOM

5.3 Plans for Approval

Table 5.2: Plans submitted for approval

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<thead>
<tr>
<th>Plan title</th>
<th>Plan reference</th>
<th>Plan Status</th>
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<tr>
<td>Site Wide Plans</td>
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<tr>
<td>Planning Application Boundary</td>
<td>60553431-DWG-ZZ-001</td>
<td>For approval</td>
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<tr>
<td>Structures and surfacing to be demolished</td>
<td>60553431-DWG-ZZ-003</td>
<td>For approval</td>
</tr>
<tr>
<td>Proposed Topography</td>
<td>60553431-DWG-ZZ-005</td>
<td>For approval</td>
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<tr>
<td>Proposed Soft Landscaping</td>
<td>60553431-DWG-ZZ-007</td>
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<tr>
<td>Proposed Hard Landscaping</td>
<td>60553431-DWG-ZZ-009</td>
<td>For approval</td>
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<tr>
<td>Proposed Public Access, Circulation and Parking</td>
<td>60553431-DWG-ZZ-010</td>
<td>For approval</td>
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<tr>
<td>Proposed Servicing, Access and Circulation</td>
<td>60553431-DWG-ZZ-011</td>
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<tr>
<td>Proposed Built Development and Land Use</td>
<td>60553431-DWG-ZZ-012</td>
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<tr>
<td>Proposed Vegetation Retention and Removal</td>
<td>60553431-DWG-ZZ-013</td>
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<tr>
<td>Building Specific Plans</td>
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<tr>
<td>Cultural Venue – Proposed Maximum Building Footprint and Envelope</td>
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<td>Ranger’s Maintenance Building</td>
<td>60553431-DWG-ZZ-017</td>
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<td>Information Centre Site Plan</td>
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<td>Information Centre Proposed Arrangements</td>
<td>AOC_241_GA 101</td>
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<td>Rockhills Residential Parameter Plans</td>
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<td>Rockhills Residential Parameter Elevations</td>
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<td>Sydenham Villas Parameter Plans</td>
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<td>Capel Manor College Anerley Site Existing Structures and Surfacing to be Removed</td>
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<tr>
<td>Capel Manor College Anerley Site Existing Vegetation Retention and Removal</td>
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<td>Capel Manor College Anerley Site Proposed Built Development and Land Use</td>
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<td>For approval</td>
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<tr>
<td>Capel Manor College Anerley Site Proposed Building Envelope and Sections</td>
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### Table 5.3: Highways Drawings submitted for approval

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<th>Plan Title</th>
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<th>Plan Status</th>
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<tr>
<td>Crystal Palace Park General Arrangements Anerley Hill Entrance</td>
<td>60553431-M1.013-SK001</td>
<td>For approval</td>
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<tr>
<td>Crystal Palace Park General Arrangements Penge Gate Entrance</td>
<td>60553431-M1.013-SK003</td>
<td>For approval</td>
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<tr>
<td>Crystal Palace Park General Arrangements Sydenham Villas 1</td>
<td>60553431-M1.013-SK005</td>
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<td>Crystal Palace Park General Arrangements Sydenham Villas 2</td>
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<td>Crystal Palace Park General Arrangements Sydenham Gate Entrance</td>
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<td>Crystal Palace Park General Arrangements Rockhills Residential</td>
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<td>Crystal Palace Park General Arrangements Rockhills Gate</td>
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Source: AECOM

### Table 5.4: Supporting application documents not for approval

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<th>Document Title</th>
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<td>Planning Statement (including Planning Obligations – Heads of Terms)</td>
<td>60553431-REP-PL-002</td>
<td>For information</td>
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<tr>
<td>Enabling Development and Financial Viability Assessment</td>
<td>60553431-REP-ZZ-006</td>
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<td>Design and Access Statement</td>
<td>60553431-REP-ZZ-001</td>
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<td>60553431-REP-ES-001</td>
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<td>Environmental Statement Volume 2</td>
<td>60553431-REP-ES-002</td>
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<tr>
<td>Environmental Statement Non-Technical Summary</td>
<td>60553431-REP-ES-003</td>
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<tr>
<td>Flood Risk Assessment and Outline Drainage Strategy</td>
<td>60553431-REP-DR-001</td>
<td>For information</td>
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<td>Energy Statement</td>
<td>60553431-REP-EN-001</td>
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<td>Heritage Statement</td>
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<td>Lighting Strategy</td>
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<td>Statement of Community Involvement</td>
<td>60553431-REP-CO-001</td>
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<td>Sustainability Statement</td>
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5.4 Accompanying Documents
## 5.5 Accompanying Plans

Table 5.5: Supporting plans not for approval

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<td>Character Areas</td>
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<tr>
<td>Cultural Venue Indicative floor plans and cross sections</td>
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Source: AECOM
RELEVANT PLANNING POLICY CONTEXT
6. Relevant Planning Policy Context

6.1 Introduction

6.1.1 This section summarises the relevant planning policy context for the Proposed Development at national, regional and local levels, and considers the statutory development plan policies against which the Proposed Development should be considered, as well as other material considerations.

6.1.2 The policy context is set out below under the following headings:

− Statutory Development Plan Policy
− Material Planning Considerations

6.1.3 Sections 19(2)(a) and 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 requires the Council to determine any application in accordance with the Statutory Development Plan unless material considerations indicate otherwise.

6.2 Statutory Development Plan Policy


6.2.2 Collectively the three acts create a plan led system which requires local planning authorities to determine Planning Applications in accordance with an adopted statutory development plan unless there are material considerations which indicate otherwise (section 38(6) of the 2004 Act as amended by the Localism Act).

6.2.3 For this application, the statutory development plan comprises the following:

− The London Plan (2016)
− The Bromley Local Plan (adopted 2019)

The London Plan

6.2.4 The existing London Plan was adopted in 2016 having been consolidated with all the alterations made to the London Plan since 2011. The London Plan sets out the spatial development strategy for Greater London, providing a framework for the development and use of land to 2036. It provides a strategic, London-wide policy context within which London Boroughs should set their local planning policies. A new London Plan, which will replace the adopted plan, is being progressed with a final version of the Plan expected to be published in Spring 2020.

Bromley Adopted Local Plan (BLP)

6.2.5 The Bromley Local Plan was adopted on 16 January 2019 and sets out the planning policies, site allocations, and land designations Boroughwide. In conjunction with the London Plan, it is used to determine planning applications.

6.2.6 The Spatial Strategy sets out the strategic and spatial approach to delivering the vision and objectives of the Borough and identifies the strategic focus for growth and change and the main locations of development.

6.2.7 Crystal Palace Park falls within the Crystal Palace, Penge and Anerley Renewal Area and is identified as a Strategic Outer London Development Centre (SOLDC) (as outlined in Policy 2.16 of the London Plan 2016) which identifies it as having above sub-regional importance due to its strategic cultural, sports, tourism and leisure functions. The Local Plan sets out that the Council will work with the Mayor, the community and other stakeholders to ensure that development proposals and other initiatives within the SOLDC contribute to the long-term planning and regeneration strategies for the Park.

6.3 Other Material Planning Considerations

National Planning Policy Framework

6.3.1 The National Planning Policy Framework (NPPF), revised in February 2019, constitutes guidance for local planning authorities as a material consideration in determining planning applications. It sets out the Government’s economic, environmental and social planning policies for England and articulates the Government’s commitment to a plan-led system where local planning authorities should approve development proposals that accord with the development plan without delay.
6.3.2 At the heart of the NPPF is a presumption in favour of sustainable development that should run through both plan-making and decision-taking. The NPPF sets out the three ‘pillars’ for the planning system in order for it to deliver sustainable development: planning for prosperity (economic role), planning for people (a social role) and planning for places (an environmental role). In assessing and determining development proposals, local planning authorities should apply the presumption in favour of sustainable development.

6.3.3 There are a number of policies contained within the NPPF which have shaped the Proposed Development, including the following:

**Heritage and Archaeology**

6.3.4 At Paragraph 189, the NPPF states that in determining applications, Local Planning Authorities (LPAs) should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, LPAs should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

6.3.5 Paragraph 192 states that in determining planning applications, LPAs should take account of the desirability of new development making a positive contribution to local character and distinctiveness.

6.3.6 Paragraph 193 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be).

6.3.7 Paragraph 194 explains that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

6.3.8 Paragraph 195 provides guidance for LPAs when considering proposals that will lead to substantial harm to or total loss of significance of a designated heritage asset, emphasising that consent should be refused unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

6.3.9 Paragraph 196 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

6.3.10 At paragraph 197, the NPPF states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

6.3.11 Furthermore, paragraph 200 states that LPAs should look for opportunities for new development within Conservation Areas and within the setting of heritage assets, to enhance or better reveal their significance.

6.3.12 Paragraph 202 indicates that local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies, but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

**Natural Environment**

6.3.13 The NPPF states that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes. Paragraph 117 sets out that planning policies and decisions should promote an effective use of land, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Paragraph 116 continues that planning permission should be refused for major developments in designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest.

**Healthy Communities**

6.3.14 Paragraph 91 states that planning should aim to achieve healthy, inclusive and safe places. Specifically, planning policies and decisions should promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other. They should create places
which are safe and accessible, and which enable and support healthy lifestyles.

6.3.15 The NPPF seeks to deliver the social, recreational and cultural facilities which local communities need. Accordingly, paragraph 92 states that planning policies and decisions should:

- Plan positively for the provision and use of shared space, community facilities and other local services;
- Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;
- Guard against the unnecessary loss of valued facilities and services;
- Ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community; and
- Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

Ecology

6.3.16 Paragraph 175 of the NPPF states that when determining planning applications LPAs should apply the following principles:

- 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;
- 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;
- development resulting in the loss or deterioration of irrereplaceable 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
- 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.

Housing

6.3.17 Paragraph 61 states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

Design

6.3.18 The NPPF confirms that the Government believe that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve, and that good design is a key aspect of sustainable development. Paragraph 127 states that decisions should aim to ensure developments:

- Function well and add to the overall quality of the area over the lifetime of the development;
- Are visually attractive by virtue of their architecture and landscaping;
- Are sympathetic to local character and history, including the surrounding built environment and landscape setting Establish a strong sense of place;
- Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development;
- Create safe and accessible and inclusive environments.

6.3.19 Paragraph 130 states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of the area and the way it functions. The NPPF goes on to state in paragraph 131 that in determining applications, ‘great weight’ should be given to outstanding or innovative designs which help raise the standard of design more generally in the area as long as they fit in with the overall
form and layout of their surroundings.

6.3.20 Paragraph 66 expects that applicants will work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.

**Employment**

6.3.21 Paragraph 80 of the NPPF states that significant weight should be placed on the need to support economic growth and productivity, considering local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.

**Transport**

6.3.22 Paragraph 102 of the NPPF states that transport should be considered from the earliest stages of development proposals, so that:

− Potential impacts on development on transport networks can be addressed;
− Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised;
− Opportunities to promote walking, cycling and public transport use are identified and pursued;
− The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account; and
− Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.

6.3.23 Paragraph 103 states that the planning system should actively manage patterns of growth and significant developments should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

**Flood Risk**

6.3.24 Paragraph 163 of the NPPF requires that when determining planning applications, LPAs should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment, it can be demonstrated that:

− 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;
− Development is appropriately flood resilient and resistant;
− It incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
− Any residual risk can be managed; and
− Safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

**Ground Conditions**

6.3.25 Paragraph 180 of the NPPF requires that planning decisions should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.

6.3.26 Furthermore, paragraph 178 states that planning decisions and policies should ensure the site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, pollution arising from previous uses and any proposals for mitigation including land remediation or impacts on the natural environment arising from that remediation.

**6.4 Emerging Statutory Development Plan Policy**

6.4.1 Paragraph 48 of the NPPF states that emerging development plans may also be afforded weight in the decision-making process according to their stage of preparation (the more advanced the preparation, the greater the weight that may be given) and the extent of any unresolved objections to them.

**Draft London Plan (2019)**

6.4.2 The draft London Plan, which will set out the broad plan to shape the way London develops
over the next 20-25 years, is being progressed, with the Examination in Public (EiP) being undertaken in 2019.

6.4.3 A final version of the Plan is expected to be published in Spring 2020, following the Panel Report from the EiP and submission of a Publish version of the Plan to the Secretary of State. The Intend to Publish version of the Plan was issued in December 2019.

6.5 Supplementary Planning Guidance

**London Plan Supplementary Planning Guidance**

6.5.1 The Mayor of London has produced a number of adopted Supplementary Planning Documents (SPD) and Supplementary Planning Guidance (SPG) documents, which are also material considerations in the determination of this Planning Application. These documents have been produced to provide further detail on particular policies in the London Plan.

6.5.2 The following SPGs have also been taken into account in the preparation of this application:

- Accessible London: Achieving an Inclusive Environment SPG (October 2014);
- Affordable Housing and Viability (August 2017);
- All London Green Grid SPG (March 2012);
- Character and Context SPG (June 2014);
- Housing (March 2016);
- Planning for Equality and Diversity in London SPG (October 2007);
- Play and Informal Recreation SPG (September 2012);
- Preparing Borough Tree and Woodland Strategies (February 2013);
- Shaping Neighbourhoods: Character and Context SPG (June 2014);
- Social Infrastructure SPG (May 2015);
- Sustainable Design and Construction SPG (April 2014); and
- The Control of Dust and Emissions during Construction and Demolition SPG (July 2014).

**Bromley Supplementary Planning Guidance**

6.5.3 The London Borough of Bromley has a number of approved Supplementary Planning Guidance Documents that are to be read in conjunction with saved UDP policies, where appropriate. These provide detailed guidance and policies on the application of strategic and borough-wide policies from the UDP. These documents form a material consideration in planning decisions. Those of relevance to the Proposed Development are outlined below:

- Adopted SPG1 - General Design Principles
- Adopted SPG2 - Residential Design Guidance
- Affordable Housing Supplementary Planning Document
- Planning Obligations Supplementary Planning Document.


6.5.4 Historic England has produced guidance on the role of enabling development to support the preservation and enhancement of heritage assets. In summary the guidance advises that:

“Enabling development that would secure the future of a significant place, but contravene other planning policy objectives, should be unacceptable unless:

a) it will not materially harm the heritage values of the place or its setting
b) it avoids detrimental fragmentation of management of the place
c) it will secure the long-term future of the place and, where applicable, its continued use for a sympathetic purpose
d) it is necessary to resolve problems arising from the inherent needs of the place, rather than the circumstances of the present owner, or the purchase price paid
e) sufficient subsidy is not available from any other source
f) it is demonstrated that the amount of enabling development is the minimum necessary to secure the future of the place, and that its form minimises harm to other public interests
g) the public benefit of securing the future of the significant place through such enabling development decisively outweighs the disbenefits of breaching other public policies.”
7. Planning Policy Response

7.1 Introduction

7.1.1 This section identifies the key planning considerations and assesses the proposed development against the development plan policy and other material considerations. It should be read together with the Design and Access Statement (DAS), Environmental Statement (ES) and other supporting technical documentation accompanying this application which provide further detail on how the proposed development is being delivered and the principles that have influenced the design.

7.1.2 This section is structured by the topics set out below. For each, there is a brief overview of policy, an assessment of the proposals against that policy, and a summary of the planning assessment. The subsequent sections cover the following topics:

- Community Facilities
- Open Space, leisure, recreation and tourism
- The Natural Environment
- Inclusive design and public realm
- Access and Movement
- Walking and Cycling
- Highways Access and Parking
- Sustainable design and construction
- Environmental Resources

7.2 Regeneration Policy

**Relevant Development Plan Policies**

7.2.1 The following development plan policies are considered relevant to the consideration of development within CPP:

- **London Plan policy 2.16**: Strategic Outer London Development Centres
- **London Plan Policy 7.9**: Heritage Led Regeneration
- **BLP Policy 15**: Crystal Palace, Penge & Anerley Renewal Area
- **BLP Policy 111**: Crystal Palace Strategic Outer London Development Centre.

*Figure 7.1: Crystal Palace Park - Boundary of Strategic Outer London Development Centre*
Assessment of the Proposed Development

7.2.2 The BLP identifies CPP as a Strategic Outer London Development Centre (SOLDC) (Policy 111) in accordance with Policy 2.16 of the London Plan. The boundary of the SOLDC (illustrated in Figure 7.1 on the previous page) covers the whole of the application site as well as the National Sports Centre (NSC) area of Crystal Palace Park (CPP) leased by the GLA which has been excluded from this application. This boundary reflects the location of strategic assets that are of more than sub-regional importance and which already generate or could potentially generate growth within the Crystal Palace area above the outer London trend.

7.2.3 London Plan Policy 7.9 offers support for planning applications which recognise the significance of heritage assets both in their own right and as a catalyst for regeneration. It sets out that, wherever possible, heritage assets should be repaired, restored and put to a suitable and viable use that is consistent with their conservation and the establishment and maintenance of sustainable communities and economic vitality.

7.2.4 The driver for the Proposed Development is the regeneration of CPP and the achievement of the Park’s long-term management in a sustainable way. The Proposed Development will contribute to and strengthen the sub-regional importance of the SOLDC whilst maintaining and improving the Park’s open setting and the visual and landscaping amenities which inform its character and that of the key heritage assets within its boundaries. The combination of these works will significantly enhance the natural environment, heritage assets and visual amenities of the Park, reinforcing the purposes of including it within MOL.

7.2.5 Historically, it has been difficult to secure the level of investment required to maintain the Park, contributing to its current poor condition. Since the transfer of the Park to the London Borough of Bromley in 1986 when the Park was inherited in a poor state of repair, the Park has presented a significant number of challenges for local authority management. The more recent challenging public sector funding climate has contributed further to these challenges and LBB has struggled to commit to the level of investment required to maintain the Park.

7.2.6 In this context LBB has developed the Regeneration Plan project, a three-pronged strategy to regenerate the Park and secure its long-term future. The approach centres on three elements:

- 1) Delivering an achievable capital scheme for regeneration of the Park within the resources available. This plan builds on the vision of the 2007 Masterplan with focus on delivery and likely capital funding.
- 2) Creating a sustainable park business model to ensure that any benefit created by the delivery of the capital scheme is ongoing.
- 3) Developing a new not for profit management organisation to take on the management and maintenance of the Park from the London Borough of Bromley, to provide the right resources and expertise to manage a regional park with national significance, without facing the financial and political challenges posed under local authority ownership.

7.2.7 To ensure that the improvements delivered under the regeneration plan are sustained, the Council has separately commissioned a business model for the Park, taking into account the proposals of the regeneration plan. The model has been formed based on market research and identified that an endowment fund will be required to generate income to bridge the gap between the estimated income and expenditure that the Park will require. It is anticipated that this endowment will be made using funds released from the proposed development.

7.2.8 The regeneration plan represents an opportunity to bring change to this important area of MOL on a scale that is realistic and deliverable. This planning application is accompanied by an Enabling Development and Financial Viability Assessment (EDFVA) identifying the amounts that will be released from the below funding sources:

- Grant Funding;
- Enabling development on housing sites.

Compliance with the Development Plan

7.2.9 Drawing on the assessment set out above, the Proposed Development is considered to be compliant with BLP Policy 111 and the London Plan policies.

7.3 Metropolitan Open Land

7.3.1 This section deals with the principle of the
Proposed Development affecting Metropolitan Open Land (MOL), including built development within MOL. The includes a section which addresses the specific issue of the effect of proposed built development on the openness of MOL.

**Relevant Development Plan Policies**

7.3.2 The following development plan policies are considered relevant to the consideration of development within Metropolitan Open Land:

- London Plan Policy 7.17: Metropolitan Open Land
- BLP Policy 50: Metropolitan Open Land

7.3.3 In addition to the development plan, draft London Plan Policy G3 Metropolitan Open Land is relevant for the consideration of development within Metropolitan Open Land.

**Assessment of the Proposed Development**

7.3.4 Approximately 99% of the application site is designated in the adopted BLP as MOL.

7.3.5 Figure 7.2 on the following page shows the extent of the MOL designation. The areas of the application site which are not designated MOL lie along the eastern boundary of the site, close to Crystal Palace Park Road and Penge Gate.

7.3.6 Planning policy affords the strongest protection to London’s MOL and requires that inappropriate development is refused except in very special circumstances, giving the same level of protection as in the Green Belt consistent with paragraphs 133-147 of the NPPF. Essential ancillary facilities for appropriate uses will only be acceptable where they maintain the openness of MOL.

7.3.7 The adopted London Plan Policy 7.17, BLP policy 50, and draft London Plan Policy G3 afford MOL the strongest possible protection and seek to resist inappropriate development which is development, by definition, that is harmful to the function of the MOL and conflicts with the purposes of including land within the MOL designation. Land designated as MOL should meet the 4 criteria set out below:

- it contributes to the physical structure of London by being clearly distinguishable from the built-up area;
- it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London;
- it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value;
- it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria.

**Quality of MOL**

7.3.8 The fundamental objective of the Regeneration Plan for which planning permission is sought is to greatly enhance the quality of the Park as Metropolitan Open Land and ensure that quality can be maintained in the long term, to benefit future visitors for decades to come.

7.3.9 Planning permission is sought for a series of works including the demolition of various existing buildings and the removal of hardstanding in MOL, and the construction of a small number of new buildings in a more consolidated layout.

7.3.10 The Regeneration Plan will de-clutter the Park, addressing the incohesive and fragmented nature of the development that currently exists. Areas of hardstanding, including surface car parking, will be removed throughout the Park in order to rationalise and improve the overall connectivity for future users, while returning areas of unnecessary hardstanding to parkland. Clutter such as redundant fencing throughout the Park, including fencing around the Intermediate Lake, will also be removed. The extent of means of enclosure to be removed is detailed on drawing number 60553431-DWG-ZZ-003 (Structures and surfacing to be demolished) which is submitted for approval.

7.3.11 In addition to removing hardstanding, it is also proposed to demolish the following buildings which lie within MOL:

- the St Johns Ambulance facility and associated storage buildings in the Transitional Landscape area;
- the maintenance shed east of Crystal Palace Museum;
- four electricity substations;
- the Park depot near the NSC;
- the current Crystal Palace Park Visitor Centre; and
- the play park area in the Cricket Ground character area.

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Public Access to MOL

7.3.12 The MOL designation is independent from issues of public access. However, as a public park, CPP provides a valuable amenity as publicly accessible open space. There are, nonetheless, some areas of the Park which are not currently publicly accessible; in particular:

7.3.13 **Caravan Club:** Since 1988, the Caravan and Camping Club have occupied a site in the location of the former Rockhills mansion (English Landscape Character Area). Figure 2.3 shows the extent of the Caravan Club’s lease within CPP. The caravan site is only accessible to site users and is entirely fenced in. Therefore, whilst it is geographically located within the Park, it operates independently from it and is not experienced as being within, or perceived to be functionally part of, CPP. The Regeneration Plan proposes to replace the Caravan Club area with an area of residential housing – ‘Rockhills’. In doing so, the extent of the inaccessible area will reduce from 2.43ha to 0.91ha. 1.52ha of land in this area will therefore be returned to the Park and made publicly accessible. The means of enclosure that currently isolate this part of the application site from the remainder of the Park will also be removed, integrating the Rockhills area more seamlessly into the Park.

7.3.14 **The Intermediate Lake:** The Intermediate Lake is leased by the Crystal Palace Angling Association and is currently only accessible to members of the association. The Regeneration Plan intends to remove the fencing around the Intermediate Lake to reinstate views and enable public access.

7.3.15 **Capel Manor College:** Capel Manor College’s two sites, Anerley Hill and the Farm Site, are currently both largely inaccessible to the public. As part of their redevelopment proposals, Capel Manor College propose increasing public access to the College with a new entrance directly outside Crystal Palace Station, and a new pathway through the mature wooded area, as well as public access to the Anerley Hill site (which is currently completely inaccessible).
Park-Related Built Development within MOL
7.3.16 The Regeneration Plan proposes a small number of new park-related buildings within MOL. These buildings are as follows:
- The Information Centre;
- Part of the reconstructed maintenance building, the majority of which lies outside of designated MOL.
7.3.17 NPPF policy sets out that the provision of appropriate facilities in connection with the existing use of land for outdoor sport and outdoor recreation are not inappropriate as long as the facilities preserve the openness of the MOL and do not conflict with the purposes of including land within it.
7.3.18 The proposed Information Centre will replace the existing Crystal Palace Information Centre (to be demolished) and will be located on the same site at the eastern end of the Park close to Penge Gate. The existing building is in poor condition and no longer fit-for-purpose; the new building will offer a new, modern facility improving the visitor experience of the Park.
7.3.19 It is proposed that the existing maintenance depot is also demolished and relocated further to the north west in the Park but adjacent to Crystal Palace Road. The relocation will accommodate the new residential units at Sydenham Villas, but will also provide a new facility that better meets the operational needs of the maintenance team.

Capel Manor College
7.3.20 Capel Manor College currently occupies two sites in CPP; the Farm site on the south-eastern edge of the site and the Anerley Hill Site east of Crystal Palace Museum.
7.3.21 The Regeneration Plan proposes the redevelopment of these two sites to remove the existing facilities, which are currently in poor condition, and replace them with new, fit for purpose facilities which will allow the College to expand its offer and take on a more prominent and proactive role within CPP. The planning application therefore seeks the demolition of existing buildings, to be replaced by up to 3,779sqm of floorspace on the Farm site and up to 737sqm on the Anerley Hill site.
7.3.22 The fabric of the existing buildings at the Farm site is ageing and no longer suitable for the training offered by CMC. While the Anerley Hill site has been developed in the past, now a single structure remains, and the majority of the site is occupied by a large composting area, storage containers and a disused maintenance depot. CMC are an important local training provider and employer and, new, improved training facilities are necessary to allow them to continue.
7.3.23 The proposed development at CMC will also bring public benefits to the Park. The redevelopment will remove buildings that are currently eyesores, replacing them with new buildings which will be sensitively designed to reflect their historical context, and will involve clearing and replanting the surrounding scrubland. New public routes through some areas of CMC, including the mature wooded area, will also improve public accessibility to the Park in the Crystal Palace Station and Anerley Hill areas.

The Cultural Facility
7.3.24 The Regeneration Plan proposes a new cultural facility to be located on Palace Terrace (Area B) within MOL. The facility will improve the cultural offer of the Park and link to the planned restoration of the Crystal Palace subway (which is being brought forward outside this planning application with separate funding already secured). While this will lead to an additional building within MOL, it is considered that the cultural benefits that the venue will bring as a visitor attraction and event space are in keeping with the current and historic purpose of the Park. The cultural facility will also help secure the long-term management and use of the Crystal Palace subway in the future.

Enabling Development and MOL
7.3.25 To make a significant contribution to the funding of the park-wide Regeneration Plan, enabling development is proposed in the form of residential development at two sites within CPP - Rockhills and Sydenham Villas - including a new community centre at Rockhills. The Sydenham Villas site lies beyond the boundary of MOL, as shown in Figure 7.3. The residential development and community centre at Rockhills, however, are within designated MOL.
7.3.26 The enabling development within designated MOL at Rockhills constitutes inappropriate development in terms of MOL policy.
7.3.27 The Caravan Club site measures 2.43Ha. Part of this area, notably those areas occupied by existing buildings (approximately 445sqm),
7.3.28 The area of land leased by the Caravan Club (2.43ha) is not currently publicly accessible. The area of land required for the proposed development at Rockhills (including the maximum building footprints and all land required for ancillary uses i.e. parking and access) measures 0.91ha. The remaining 1.52ha of land currently leased by the Caravan Club will be returned to the Park and will become publicly accessible. Therefore, there will be a net increase in publicly accessible MOL of 1.52ha in the north western corner of the site where the Caravan Club is located.

7.3.29 The built development will be concentrated at the periphery of the site adjacent to the highway in a suburban setting. Whilst the maximum land take for the built development at Rockhills involves development on undeveloped MOL; taking a pragmatic view this approach seeks to reduce, rationalise and consolidate developed area into a discrete site. It will see the removal of the buildings, hard surfacing and means of enclosure which currently project into the Park, detracting from the landscape and compromising the sense of openness fundamental to the function of MOL. The impact of this consolidation of built form at the periphery of the site will improve perceptions of openness and the quality of MOL.

Openness of MOL

7.3.30 The built development aspects of the Proposed Development have been carefully designed to respect the MOL designation and, as far as possible, to preserve the openness of the MOL. The Proposed Development would introduce new massing into the townscape in the form of the Capel Manor College buildings at the Anerley Hill and Farm sites; the residential buildings at Rockhills and Sydenham Villas; and the Crystal Palace Park Subway Cultural Venue. However, these buildings utilise, as far as possible, previously developed land within

constitutes previously developed land. Development in this location is not ‘inappropriate’ within the terms of policy relating to MOL. In addition to land occupied by buildings, a substantial part of the existing site is covered by hardstanding; in total approximately 1.03ha of the site is covered either by building footprint or hardstanding. These buildings and hardstanding will be removed as part of the Proposed Development.
the Park and concentrate development in well-located areas on the edges of the Park to minimise their impact on the openness of MOL.

7.3.32 NPPF planning policy sets out at Paragraph 141 that once Green Belts (in this case MOL) have been defined, local planning authorities should plan positively to enhance their beneficial use, to improve opportunities for access, outdoor sport and recreation, enhance landscapes, visual amenity and biodiversity and improve damaged and derelict land. It is considered that the Proposed Development responds positively to this policy improving access and enhancing the existing landscapes and visual amenity.

7.3.33 In terms of visual impact, it is considered that the Proposed Development will not have a negative impact on the majority of viewpoints within MOL. The only view which has been identified as being negatively impacted by the Proposed Development is in close proximity to the proposed Capel Manor College Farm site building where the proposed massing is greater than the existing. However, it is important to note that this is based only on the massing envelope and does not consider the potential benefits that would arise from high quality architectural design, form and detailing.

7.3.34 Overall it is considered that the additional buildings proposed as part of the Regeneration Plan would not have a harmful impact on the openness of MOL. The location and massing of development proposed through the Parameter Plans submitted as part of this application show that careful thought has been given to locate new buildings where they will have minimal impact on the openness of the Park and where they will integrate with the existing development around the edge of the Park. The existing buildings are of poor quality and condition and, in replacing these existing buildings with well-designed, purpose-built buildings, the Proposed Development will actually result in beneficial effects on the townscape and visual aspects of the MOL.

7.4 Very Special Circumstances for Development within MOL

7.4.1 As well as delivering major improvement to the quality and openness of the MOL, the Proposed Development does include some ‘inappropriate’ development within existing MOL, namely:
- Enabling development at Rockhills (existing Caravan Club site);
- Capel Manor College facilities on the Farm site and Anerley Hill Site; and
- Cultural venue adjacent to the Crystal Palace Park subway.

7.4.2 Other proposed built development within existing MOL is directly related to the use of the MOL as public open space and is not, therefore, inappropriate.

7.4.3 The very special circumstances (VSCs) that clearly outweigh the very strong presumption against inappropriate development on MOL surrounding this planning application are set out below. They address the Park as a whole as well as the individual buildings that are proposed.

7.4.4 The Proposed Development presents an opportunity to regenerate Crystal Palace Park. The Park is a Grade II* listed Registered Park and Garden with features of national and international significance; however, it has fallen into disrepair and is currently included within the Heritage at Risk Register due to significant localised problems. The works that are proposed as part of the Regeneration Plan would improve the condition of the Park, with the intention of removing it from the Heritage at Risk Register. The Proposal aims to create a place of discovery, learning, recreation and fun in the spirit of Sir Joseph Paxton; developing the Park’s local and regional identity; re-establishing its national and international significance; providing benefits to the community and securing a financially and environmentally sustainable future for Crystal Palace Park for the enjoyment of generations to come.

7.4.5 The Proposed Development will ensure the restoration of important historic assets including the dinosaurs (Grade I listed), the upper and lower terrace (Grade II listed), the pedestrian subway (Grade II* listed), railings and walls (Grade II listed), and the Grade II* Registered Park and Garden as a whole. Improving the setting of these assets and restoring the original historic landscape design principles of the Park will improve the ability of these heritage assets to be understood and appreciated by visitors.
7.4.6 In terms of community benefits the proposed development will result in:
- the removal of barriers between areas of the Park;
- the enhancement of circulation routes including adaptations to ensure the ease of use for all abilities;
- the opening up of views;
- the integration of points of interest, facilities and events; and
- the clear but not overly formal organisation of the Park based on Paxton's principles.

7.4.7 The above measures will ensure that the Park will become a focus of local community activity and a significant attraction in the wider region, encouraging social cohesion.

7.4.8 In terms of economic regeneration an aim of the regeneration plan and the proposed development is to ensure that the Park is a destination in its own right, becoming a focus of activity for the surrounding area and encouraging a sustainable approach to economic development given its complement of sports, recreation and visitor facilities, and a range of events and other attractions. The Park itself will also offer employment, through ongoing maintenance requirements, as well as within the proposed community and cultural facilities.

7.4.9 In terms of recreational benefits, the Park’s open space would be of high quality and organised in such a way as to offer diverse recreational opportunities. These will range from the very casual - promenading through a coherent but varied landscape composition - to enjoying different facilities and events, and engaging in play and sports activities of informal or formal nature.

Enabling Development
7.4.10 The residential development being proposed as part of this application will provide substantial capital receipts which will be used exclusively to fund the Park-wide regeneration proposals and contribute significantly to an endowment to ensure quality maintenance of the Park in the long term.

7.4.11 The Enabling Development and Financial Viability Assessment submitted in support of the outline planning application demonstrates that the proposed enabling development meets the seven tests set out in Historic England’s guidance, namely that:
- a) It will not materially harm the heritage values of the place or its setting;
- b) It avoids detrimental fragmentation of management of the place;
- c) It will secure the long-term future of the place and, where applicable, its continued use for a sympathetic purpose;
- d) It is necessary to resolve problems arising from the inherent needs of the place, rather than the circumstances of the present owner, or the purchase price paid;
- e) Sufficient subsidy is not available from any other source;
- f) It is demonstrated that the amount of enabling development is the minimum necessary to secure the future of the place, and that its form minimises harm to other public interests;
- g) The public benefit of securing the future of the significant place through such enabling development decisively outweighs the disbenefits of breaching other public policies.

The capital receipts from the enabling development will be used exclusively to fund the regeneration proposals, and for no other purpose. It is anticipated that when granted, the planning permission may, through legal obligation/unilateral undertaking, identify specific works which will be funded, or part funded, through the capital receipts from the enabling development.

7.4.12 Paragraph 202 of the NPPF indicates that local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies, but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

Cultural Venue
7.4.14 The Cultural Venue will bring with it a number of benefits in keeping with the current and historic traditions of the Park as a place of learning and recreation. It will attract visitors, not only to the venue itself, but to the Park more widely, placing CPP more firmly on London’s cultural map.

It will also contribute to the local economy and to a sustainable, viable business case for the future management and use of the subway as an event space once it has been restored. This will support the long-term future of this
important Grade II* listed piece of Victorian architecture and engineering.

**Capel Manor College**

7.4.16 In terms of CMC, the NPPF sets out (at paragraph 145) that the construction of new buildings for agriculture, forestry, outdoor sport and recreation may not be considered ‘inappropriate’ development in MOL. It further sets out that:
- the replacement of a building may not be ‘inappropriate’ in MOL provided the new building is in the same use and not materially larger,
- and that redevelopment of previously developed land may not be ‘inappropriate’ provided that it would not have a greater impact on openness.

7.4.17 The Farm Site has existing buildings on it that are no longer fit-for-purpose. The Anerley Hill Site has been developed in the past, but now a single structure remains, and the majority of the site is occupied by a large composting area, storage containers and a disused maintenance depot.

7.4.18 Both sites are well-screened by trees and vegetation. Splitting the development between the two sites will reduce the size of the built form on each site (single storey at Anerley Hill and part single, part multiple storey at the Farm Site making use of topography) reducing the impact of both areas on the openness of MOL. The larger amount of development is on the Farm Site where it will occupy existing areas covered by building and hardstanding.

7.4.19 The buildings have also been set away from historical boundaries to the Park and positioned to respect existing mature trees and retain heritage landscape. Sensitive design will integrate the new buildings into their historic context and replanting of the surrounding scrub areas will improve the setting of the Park.

7.4.20 The proposal will bring substantial public benefits. These include, in particular:
- Improved public access to areas of CMC and the Park with a new entrance directly outside Crystal Palace Station, and a new pathway through the mature wooded area and public access to the Anerley Hill site (not currently the case);
- A significant provision of skills, education and training relevant to green space which will raise the profile of the Park;
- Improvements to the currently run-down nature of the two sites (the Anerley Site in particular suffers from instances of antisocial behaviour); and
- Economic benefits to the local area as student and staff numbers increase and the Farm becomes a more attractive visitor experience. Students from Capel Manor College will also work alongside park management and maintenance to support the management of the Park.

7.4.21 These Very Special Circumstances combined are considered to outweigh any harm to the openness of the MOL and any harm by reason of inappropriateness.

**Compliance with Development Plan Policy**

7.4.22 In summary, the Proposed Development will bring wider benefits to the community, to economic regeneration, to recreation and to heritage assets in addition to increasing the extent of MOL which is publicly accessible. This is considered to significantly outweigh any harm with respect to the inappropriate development identified. The principal component in the balance is the overall benefit to MOL in the Park which will be brought about by the regeneration plan.

7.4.23 NPPF paragraph 202 indicates local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies, but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies. The capital receipts derived from the proposed residential development at Rockhills and Sydenham Gate, and the economic and social benefits of the cultural centre and increased presence of Capel Manor College is critical to the success of the Park-wide proposals.

7.4.24 A small part of the land at the existing Caravan Club site to be used for enabling development is considered to constitute previously developed land and development in this location is not therefore considered to be inappropriate. The adopted London Plan Policy 7.17, BLP Policy 50, and draft London Plan Policy G3 afford MOL the strongest possible protection and seek to resist inappropriate development which is development, by definition, that is harmful to the function of the MOL and conflicts with the
purposes of designating land as MOL.

7.4.27 In conclusion, very special circumstances exist to justify the proposed inappropriate development within MOL. These can be summarised as:

- **Heritage benefits** – addressing the continued deterioration of heritage assets and the removal of items on the Heritage at Risk Register. The proposed Cultural venue will support the viable long-term use of the Crystal Palace Subway;
- **Community Benefits** – improving the environmental quality of the Park and increasing the area of publicly accessible Park, and improving access and circulation for visitors;
- **Economic benefits** – due to increased visitors, students and staff numbers;
- **Educational benefits** – from the Capel Manor College proposals, which will also contribute to the maintenance of the Park.

7.4.28 The benefits to the MOL and the Grade II* Park have been outlined in the preceding paragraphs; it is considered that they contribute to the function of the land as MOL and these significantly outweigh any harm by way of inappropriateness with respect to the inappropriate development identified. It is considered that the benefits that the scheme will deliver in terms of quality, accessibility and long-term sustainable use of the Park, constitute very special circumstances which mean that the Proposed Development is acceptable in respect of MOL policies.

7.5 Heritage

**Relevant Development Plan Policies**

7.5.1 The following development plan policies are considered relevant to the consideration of development impacting heritage assets:

- **London Plan Policy 7.8**: Heritage Assets and Archaeology
- **London Plan Policy 7.9**: Heritage-Led Regeneration
- **BLP Policy 38**: Statutory Listed Buildings
- **BLP Policy 39**: Locally Listed Buildings
- **BLP Policy 40**: Other Non-Designated Heritage Assets
- **BLP Policy 41**: Conservation Areas
- **BLP Policy 42**: Development adjacent to a Conservation Area
- **BLP Policy 43**: Trees in Conservation Areas
- **BLP Policy 45**: Historic Parks and Gardens
- **BLP Policy 46**: Ancient Monuments and Archaeology

7.5.2 In addition to the development plan, draft London Plan Policy HC1 Heritage conservation and growth, is of relevance for the consideration of development impacting heritage assets.

**Assessment of the Proposed Development**

7.5.3 The planning application is accompanied by a Heritage Statement which assesses the significance of the heritage assets impacted by the Proposed Development.

7.5.4 Crystal Palace Park is a Grade II* listed Registered Park and Garden which contains a number of listed heritage features. Further nationally and locally listed heritage features are located in proximity to the Park. The restoration and conservation of heritage assets is at the heart of the Proposed Development and, recognising the Park’s historical importance, the need to take a sensitive approach to development has been embedded into the development of the Proposal from the outset.

7.5.5 The Environmental Statement includes an assessment of the impact of the Proposed Development on heritage assets. It is considered that the enabling works, demolition and construction of the Proposed Development will have an adverse impact on the Park during the construction period due to the movement and storage of raw materials and large equipment. However, these impacts are expected to be temporary and mitigatable through the phasing strategy and Construction and Environmental Management Plan (CEMP). However, it is anticipated that some poorly preserved features of the Upper and Lower Italian Terraces may need to be permanently removed due to their condition and as a result of this, the Proposed Development will have a permanent moderate adverse effect on the archaeological features of the Upper and Lower Italian Terraces.

7.5.6 Paragraph 196 of the NPPF sets out that where a development proposal would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the...
propose including where appropriate, securing its optimum viable use.

7.5.8 Overall it is considered that the Park will experience permanent beneficial impacts from all the constituent parts of the Proposed Development during the operational phase of the scheme as a result of the demolition of inappropriate and redundant buildings; returning some areas of the Park to accessible green space; the conservation and restoration measures; and the proposed replanting schemes.

7.5.9 While, the Proposed Development does introduce new built elements into the Park, these have been designed to be screened from the majority of the Park with the residential development and new community centre consolidated into two discreet areas of the Park. The cultural venue includes a viewing platform which will provide views of the whole Park, providing an opportunity to interpret the historical significance of the Park in a new way.

7.5.10 The Heritage Statement also sets out the approach to arresting the deterioration of the heritage assets which includes their repair, conservation, restoration and re-use as appropriate. In summary conservation and repair works are proposed for a section of the Crystal Palace basement wall (Paxton Tunnel Wall), Upper and Lower Italian Terrace walls, the bust of Sir Joseph Paxton, the gate piers to Rockhills, the north and south railings and walls at Crystal Palace Parade, the prehistoric animal structures, and the Colonnade Wall. In addition to this, earthworks and landscape improvements will be undertaken to re-profile the Upper and Lower Terraces, declutter and create new sensitive planting. The restoration works included within the Proposed Development aim to facilitate the removal of some of the historical assets of the Park from the Heritage at Risk Register.

7.5.11 The Design and Access Statement (DAS), submitted in support of the planning application, sets out park-wide design strategies, spatial proposals encapsulating the vision and aims of the Regeneration Plan, which reflect the overall objective to regenerate the Park and secure its long term future in a way that is consistent with the conservation of the heritage assets and the establishment and maintenance of sustainable communities and economic vitality in compliance with relative planning policy.

7.5.12 To allow for flexibility at detailed design stage but provide security that the future scheme will be successful in their intention to celebrate the heritage assets within and surrounding the application site the DAS also includes Design Principles which provide a framework to guide the development of the detailed schemes and aid the determination of the future reserved matters applications.

7.5.13 The Proposed Development will preserve and enhance the character and appearance of the Crystal Palace Conservation Area through the works to regenerate the Park and clear the clutter that detracts from the intrinsic qualities of the conservation area. The proposed development at the Palace Terraces will enhance the character and appearance of the area and will improve the views into and from within the conservation area.

7.5.14 The planning application is accompanied by an Enabling Development and Financial Viability Assessment which explains why an element of enabling development is essential to fund the regeneration proposals, which will deliver significant improvements, and long-term care of the Park itself and individual heritage assets within the Park.

Compliance with the Development Plan

7.5.15 The Proposed Development will, overall, have a significant positive effect on the heritage value of the Park and significant heritage assets within the Park. It is acknowledged that some elements of the Proposed Development would have some negative effect on the heritage value of the Park. These elements are the proposed residential development at Rockhills and Sydenham Villas and the Capel Manor College proposals at the Farm Site and Anerley Site.

7.5.16 These elements are fundamental to the delivery of the Regeneration Plan with the significant heritage benefits that it will deliver. When considered as a whole, it is considered that the Proposed Development accords with Development Plan policy in relation to heritage.

7.6 New Housing

Relevant Development Plan Policies

7.6.1 The following development plan policies are considered relevant to the consideration of new housing:
Assessment of the Proposed Development

7.6.2 In addition to the development plan, draft London Plan Policy H1: Increasing housing supply and the Housing SPG (Greater London Authority, 2016) and draft London Plan Policy GG2 Making the best use of land are of relevance for the consideration of residential development.

Assessment of the Proposed Development

7.6.3 The principle of enabling housing development within the two locations proposed – Rockhills and Sydenham Villas – was established previously through the outline planning consent granted in 2010 (07/03897/OUT).

7.6.4 The current proposals follow closely the parameters identified for the residential development within the extant permission. Whilst it is the case that the 2010 permission also proposed more comprehensive regeneration proposals across the Park, it is demonstrably the case that the scope of regeneration proposed in the 2010 permission could never have been delivered due to a lack of additional funding. In contrast, the current park-wide regeneration proposals are deliverable with a realistic level of grant funding alongside the receipt from the enabling development. This is explained in more detail in the Enabling Development and Financial Viability Assessment which accompanies the Outline Planning Application.

7.6.5 Table 3.1 of the adopted London Plan sets out the minimum ten-year target for housing delivery for the period 2015-2025; for the London Borough of Bromley the 10-year target is 6,413 dwellings (annualised average of 6,413 dwellings per annum). Policy 1 of the Bromley Local Plan is consistent with the adopted London Plan and sets a target for a minimum average of 641 additional homes to be delivered each year. The recently published draft London Plan increases the 10-year target for net housing completions for the London Borough of Bromley for the period 2019/20-2028/29 to 7740 homes, 3,790 of which should be delivered on small sites below 0.25ha as detailed within Table 4.1 and 4.2 of the draft Plan.

7.6.6 The Proposed Development will contribute to addressing London’s housing needs by seeking planning permission for a maximum of 18,847sqm of residential floorspace (Use Class C3). Planning permission is not sought for a set number of residential units but instead a maximum of 210 units; the final number will be realised following detailed design work but will not exceed 210 units. The illustrative material submitted details how 210 residential units could be delivered within the parameters proposed. The Proposed Development will be a significant contribution to helping meet the housing targets for LBB and London.

Compliance with the Development Plan

7.6.7 The proposed residential development at Rockhills and Sydenham Villas are located on sites which are not specifically allocated in the London Borough of Bromley Local Plan for housing.

7.6.8 The Proposed Development will contribute to meeting the housing targets for LBB as set out in Policy 3.3 of the adopted London Plan, BLP Policy H1 Housing Supply, draft London Plan Policy H1 Increasing housing supply, and the Housing SPG (Greater London Authority, 2016).

7.7 Housing Type and Tenure

Relevant Development Plan Policies

7.7.1 The following development plan policies are considered relevant to the consideration of housing type and tenure:

- London Plan Policy 3.8: Housing Choice
- London Plan Policy 3.11: Affordable Housing Targets
- London Plan Policy 3.12: Negotiating Affordable Housing on Individual Private Residential and Mixed-Use Schemes
- London Plan Policy 3.13: Affordable Housing Thresholds
- BLP Policy 2: Provision of Affordable Housing

7.7.2 In addition to the development plan, draft London Plan Policy H5 Delivering Affordable Housing, draft London Plan Policies H6 Threshold approach to applications, H7 Affordable housing tenure, H8 Monitoring of affordable housing, and Affordable Housing and Viability Supplementary Planning Guidance SPG (Greater London Authority, 2017) are of relevance for the consideration of affordable housing.

Assessment of the Proposed Development
7.7.3 Policy 3.8 of the adopted London Plan confirms that, taking account of housing requirements identified at regional, sub-regional and local levels, boroughs should identify the range of needs likely to arise within their areas and ensure that a new development offers a range of housing choices with respect to size and type.

7.7.4 Policies 3.11 and 3.12 of the adopted London Plan seek to secure the maximum reasonable amount of affordable housing provision with residential and mixed-use development; taking into account various factors such a local and regional demand, planning positively for mixed and balanced communities and the specific circumstances of the individual site including the viability of the proposed development. Policy 3.11 includes a tenure split of 60% social and affordable rent and 40% for intermediate rent or sale; with priority given for the provision of affordable family housing.

7.7.5 Policy 2 of the BLP seeks 35% affordable housing on sites providing 11 residential units or more (with a tenure split of 60% social-rented/affordable rented and 40% intermediate provision) unless it can be demonstrated that a lower level should be sought. The Mayor’s Affordable Housing and Viability Supplementary Planning Guidance SPG was published in August 2017 and it sets out the Mayor’s preferred approach to implementing London Plan Policies 3.11, 3.12 and 3.13. Essentially the SPG sets out a threshold approach to affordable housing and viability assessments; where the approach to viability information differs depending on the level of affordable housing being provided. The SPG requires schemes on publicly owned land to provide 50% affordable housing without public subsidy and any schemes not meeting this must be considered under the Viability Tested Route will a requirement to supply viability information at the application stage.

7.7.6 The Proposed Development seeks planning permission for a maximum of 18,847sqm of residential floorspace (Use Class C3) (a maximum of up to 210 dwellings) for market rent.

7.7.7 The Proposed residential development is for market housing, with no provision of affordable housing. The Proposed residential development constitutes enabling development, which is essential to enable the delivery of the Regeneration Plan for the Park.

7.7.8 The Enabling Development and Financial Viability Assessment submitted in support of the planning application explains how the proposed enabling development meets the criteria established by Historic England to guide the use of enabling development for the conservation and enhancement of heritage assets.

7.7.9 The Enabling Development and Financial Viability Assessment also explains the implication of the delivery of varying levels of affordable housing within the enabling development and the implications for the delivery of the Regeneration Plan.

7.7.10 The introduction of affordable housing at the enabling development sites will result in a lower capital receipt or increased density. The level of capital receipt derived from a 100% private scheme covers just over 50% of total expenditure of conservation and repair in the Regeneration Plan. The work the Council’s advisers have undertaken to investigate a potential increase in the provision of enabling development in additional locations at CPP has demonstrated that this would likely have a negative impact on the historical setting of the Park which is one of the key issues that the proposed plans have aimed to mitigate and the existing scheme design illustrates the maximum feasible from the two sites at Rockhills Gate and Sydenham Villas.

Compliance with the Development Plan

7.7.11 The Proposed Development does not comply with development plan policies relating to the delivery of affordable housing.

7.7.12 The proposed housing is being developed as enabling development which will make the restoration of, and improvements to CPP, possible. The Park’s scale, complex landscape and significant number of damaged heritage features remain a challenge for the local authority in terms of their budgets and expertise. Without large scale investment and intervention into the Park for restoration and regeneration, it is likely that there would be significant deterioration of the historic fabric with the potential total collapse of the some parts of the terrace walls and loss of individual dinosaurs, increased health and safety concerns, increase in anti-social behaviour, decrease in visitor numbers with associated impact on social well-being and health,
potential deterioration in local economy and decrease in land values and increased pressure for development inappropriate to CPP as a registered historic park and as a public park.  

7.7.13 In particular, receipts from the enabling development will contribute to the conservation and repair of:  
- A section of the Crystal Palace basement wall (Paxton Tunnel Wall);  
- The Upper and Lower Italian Terrace walls;  
- The Bust of Sir Joseph Paxton;  
- The Gatepieris to Rockhills;  
- The North and South Railings and Walls at Crystal Palace Parade;  
- The Prehistoric Animal Structures; and  
- The Colonnade Wall.  

7.7.14 The benefits that the receipts from the enabling development will bring should be considered in the context of paragraph 202 of the NPPF which sets out that local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies, but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.  

7.8 Housing Design and Density  

Relevant Development Plan Policies  
7.8.1 The following development plan policies are considered relevant to the consideration of housing design and density:  
- **London Plan Policy 3.4**: Optimising Housing Potential  
- **London Plan Policy 3.5**: Quality and Design of Housing Developments  
- **London Plan Policy 7.1**: Lifetime Neighbourhoods  
- **London Plan Policy 7.4**: Local Character  
- **London Plan Policy 7.6**: Architecture  
- **BLP Policy 4**: Housing Design  
- **BLP Policy 37**: General Design of Development  

7.8.2 In addition to the development plan, draft London Plan Policies D1 London’s form and characteristics, D2 Delivering good design D3 Optimising site capacity through the design-led approach and D6 Optimising housing density, the Mayor’s Housing Design, Character and Context SPG (Greater London Authority, 2014) and Mayor’s Housing SPG (Greater London Authority, 2016) are of relevance for the consideration of design.  

Assessment of the Proposed Development  
7.8.3 The policy context surrounding housing design requires that the design of all new housing developments should enhance the quality of local places, taking into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of, public, communal and open spaces, taking particular account of the needs of children, disabled and older people.  

7.8.4 The adopted London Plan emphasises the role of masterplans and design codes to help bring forward development and ensure it delivers high quality design and place-making.  

7.8.5 The proposed parameters for the residential elements of this planning application have been established following a contextual analysis of the surrounding area taking into account physical context; local character; density; tenure and land use mix. Further information can be found in the Design and Access Statement (DAS). The future residential schemes will enhance the quality of the locality, taking into account and reflecting important design features of the local area including surrounding arts and crafts villas, in accordance with policy.  

7.8.6 Alongside the Parameter Plans, the DAS includes a set of design principles which, although not for approval, establish the vision for the Application Site and set out details of scale, character, use and landscape. Illustrative material has been submitted alongside the planning application to demonstrate one way of realising the parameters proposed, consistent with the principles set out within the DAS. However, it should be noted that these are for illustrative purposes only and not for approval.  

7.8.7 Crystal Palace Park is located in a suburban setting and the PTAL score for Crystal Palace Park ranges from 1a (worst) to 6a (good). There is access to a good range of public transport facilities within a short walking distance; including proximity to Upper Norwood, Penge West, Penge East, Gipsy Hill and Sydenham over-ground stations as well as bus stations.  

7.8.8 Residential development is proposed at Rockhills and Sydenham Villas where the PTAL rating is 3, as illustrated in Figure 7.4 on the previous page. Table 3.2 of the adopted London Plan sets out that an appropriate density in this
location, with this degree of public transport accessibility, is between 150-250 habitable rooms per hectare.

7.8.9 The Proposed Development envisages approximately 527 habitable rooms per hectares, based on the illustrative scheme of 210 new homes, and the residential scheme design shown on the illustrative drawings submitted with the planning application.

7.8.10 While this is above the suggested density set out in the adopted London Plan, there are reasons why this is the case. The residential element of the Proposed Development has been deliberately consolidated into discreet areas of the Park to minimise the extent of residential development and reduce its impact on the wider setting of the Park. As a result, the density is higher than that of buildings in the surrounding area. Given the nature of the Proposed Development, only a small amount of open space is provided within the footprints of the residential elements as it is considered that open space provision is largely being provided through the connection to the Park. This means that the land-takes of the residential elements are smaller than would normally be the case for a similar development, therefore producing a higher result in terms of density calculation. The residential elements also require little land for highway development given their location on the edges of the site. This again reduces the land take for the residential elements and increases the density calculation as a result.

7.8.11 The Proposed residential development will meet the minimum gross internal area standards set out in the ‘Technical Housing Standards’ (2015). 10% of dwellings will be accessible, meeting the South East London Housing Partnership accessibility standards.

Compliance with the Development Plan

7.8.12 The residential element of the Proposed Development complies with development plan policy regarding density, proposing a density that accords with the adopted London Plan density matrix, based on the appropriate PTAL rating.

7.8.13 While approval of detailed design is not sought at this stage, the parameter plans, DAS and illustrative drawings submitted alongside this planning application show how massing, elevation and layout have been considered, taking into account the surrounding existing development. The maximum elevations in the
parameter plans remain sensitive to their surroundings. The DAS provides a clear analysis of the surrounding context, showing that design has been considered throughout the development of the residential element of this application.

7.9 Community Facilities

 Relevant Development Plan Policies

7.9.1 The following development plan policies are considered relevant to the consideration of community facilities as part of the regeneration plans:
- London Plan Policy 3.16: Protection and Enhancement of Social Infrastructure
- London Plan Policy 3.18: Education Facilities
- BLP Policy 20: Community Facilities
- BLP Policy 21: Opportunities for Community Facilities
- BLP Policy 22: Social Infrastructure in New Developments
- BLP Policy 26: Health and Wellbeing
- BLP Policy 27: Education

7.9.2 In addition to the development plan draft London Plan Policy S1 Developing London’s Social Infrastructure, and Policy S3 Education and childcare facilities.

 Assessment of the Proposed Development

7.9.3 Social infrastructure is defined within the NPPF and includes facilities such as early years provision, community, cultural, recreation and sports facilities, children and young people’s play and informal recreation facilities.

7.9.4 The Proposed Development includes three facilities which will provide significant further community benefits. The first is the community centre that will be located at Rockhills and will provide a flexible community facility to replace the existing nursery on Crystal Palace Park Road and to provide a space that can be utilised by the community.

7.9.5 The second building will be a cultural centre on the Upper Palace Terrace linked to the Crystal Palace Subway. It is intended to provide a cultural venue space with public convenience facilities such as toilets and a café on the ground floor. By its positioning and relationship with the Crystal Palace Subway will seek to bring this space back to beneficial use. It will also offer a viewing platform which will provide visitors with a new perspective of the Park.

7.9.6 The final proposed facility is the education space that will be provided for Capel Manor College (CMC). This element of the Proposed Development will enhance the education offer of CMC by improving facilities and providing opportunities to increase staff and student numbers on the Crystal Palace campus. CMC not only provides full-time courses, but also part-time courses and a successful apprenticeship scheme.

 Compliance with the Development Plan

7.9.7 Drawing on the assessment set out above, the Proposed Development is considered to be compliant with the highlighted planning policies relating to community facilities.

7.10 Open Space, Recreation, Leisure and Tourism

 Relevant Development Plan Policies

7.10.1 The following development plan policies are considered relevant to the consideration of development impacting open space, recreation, leisure and tourism:
- London Plan Policy 2.16: Strategic Outer London Development Centres
- London Plan Policy 2.18: Green Infrastructure: The Multi-Functional Network of Green and Open Spaces
- London Plan Policy 3.2: Improving Health and Addressing Health Inequalities
- London Plan Policy 3.6: Children and Young People’s Play and Informal Recreation Facilities
- London Plan Policy 4.6: Support and Enhancement of Arts, Culture, Sport and Entertainment
- London Plan Policy 4.5A: London’s visitor Infrastructure
- London Plan Policy 7.18: Protecting Open Space and Addressing Deficiency
- BLP Policy 20: Community Facilities
- BLP Policy 21: Opportunities for Community Facilities
- BLP Policy 22: Social Infrastructure in New Developments
- BLP Policy 26: Health and Wellbeing
- BLP Policy 54: South East London Green Chain
- BLP Policy 57: Outdoor Recreation and Leisure
Assessment of the Proposed Development

7.10.3 The long-term vision for CPP is to ensure that it is a place of tourism, leisure, recreation and learning in the spirit of Paxton’s vision, reinvigorating it as both a contemporary and historic showcase. The landscape improvements will make the Park more accessible and pleasant, while the restoration of many of the important historical features and the construction of the cultural centre will celebrate the important history of the site.

7.10.4 The Proposed Development will achieve a transformation in the quality as CPP as a multi-functional open space and will provide community benefits through the additional facilities proposed as well as through improving connections to existing local facilities and the local economy. It will also secure a modern, financially and environmentally sustainable plan, safeguarding the long-term future of CPP.

7.10.5 This reflects CPP’s designation in development plan policy as a Strategic Outer London Development Centre with a focus on leisure, tourism, arts, culture and sports with the potential to generate growth beyond that of the outer London trend.

7.10.6 The Proposed Development will increase public accessibility within the Park. The section of the site that is currently occupied by the Caravan Club will be permanently returned to publicly accessible Parkland. This land currently provides space, facilities and public transport connections for touring visitors wanting to visit London. The Proposed Development will lead to the loss of the Caravan Club at the Rockhill’s site; contrary to development plan policy.

7.10.7 The London Borough of Bromley have considered other possible locations for a caravan site, both within the Park (undertaken by AECOM) and elsewhere within the Borough. Eight potential locations were identified within the Park; however, none of these sites were considered to be suitable due to issues of loss of publicly accessible land, vehicle accessibility, impacts on neighbouring residents and size. A further 22 sites were assessed across the Borough for suitability but were found to be unsuitable largely due to their lack of connectivity to central London. It is therefore considered that there are no suitable options for the reprovision of the Caravan Park within the Borough.

7.10.8 The Intermediate Lake is currently only accessible to members of the Angling Association; the improvements will remove the fencing that currently surrounds the Intermediate Lake making it publicly accessible to everyone. An improved network of accessible footpaths throughout the Park will also improve accessibility to the Park for all members of the public.

7.10.9 Capel Manor College’s two sites, Anerley Hill and the Farm Site, are currently both largely inaccessible to the public. As part of their redevelopment proposals, Capel Manor College propose increasing public access to the College with a new entrance directly outside Crystal Palace Station, a new pathway through the mature wooded area and public access to the Anerley Hill site (which is currently completely inaccessible).

7.10.10 The size and historical importance of CPP makes it an important contributor to the network of public open space and green infrastructure within South London and an important part of the South East London Green Chain. However, the poor condition of the Park means that it is not currently fulfilling its full potential as a focus of local communities and a sub-regionally significant green open space.

7.10.11 London Plan Policy 2.18 sets out that the network of green infrastructure across London should be multi-functional securing benefits in terms of biodiversity, natural and historic landscapes, culture, building community and improving health and wellbeing, sport, recreation, mitigating and adapting for climate change, local food production and benefits to the economy.

7.10.12 The Proposed Development will improve the
quality of, and increase the extent and access to, London’s network of green infrastructure. It will contribute to a wider open space network which will be connected to the surrounding infrastructure, including pedestrian and cycle routes, in order to make it as accessible as possible to the neighbouring communities, and encourage more sustainable forms of transport.

7.10.13 The Proposed Development will transform the environmental quality of the Park as a destination for recreation, leisure and tourism and as a venue for outdoor events. It will also greatly enhance the quality of the Park as a play space for children of all ages. The Regeneration Plan includes specific provision of modern play facilities.

7.10.14 The Proposed Development recognises that play is a fundamental component of childhood, promoting social interaction, learning and a healthy lifestyle, and that it is, therefore, important to provide high quality, well-located child play spaces which will facilitate this. In order to ensure adequate play space, the Proposed Development has sought to maximise play in appropriate locations and considered spaces for the range of children identified. To this end, a new replacement playground will be provided at the southern end of the Park in the Cricket Ground Character Area.

7.10.15 Two further play areas will also be provided to meet the needs of the local community and the proposed residential development and will be publicly accessible for the benefit of all. The Proposed Development seeks planning permission for a maximum of 18,847sqm of residential floorspace which will provide a maximum of 210 residential units. The illustrative material demonstrates that this proposed floorspace and maximum number could indicatively deliver the following mix: 64 x 1-bed flats (30%), 144 x 2-bed flats (69%) and 2 x 3-bed flats (1%).

7.10.16 Using the GLA Population Yield Calculator (v3.2) (October 2019) and based on the above assumptions, this would result in a child yield of 59. Given a requirement for 10m² of play space per child, a total of 584sqm is required. This breaks down into the following requirements:
- 0-4 years: 32 children
- 5-11 years: 21 children
- 12+ years: 6 children

7.10.17 These figures indicate that it will be particularly important to provide play facilities for younger children. A Natural Play space is proposed within 100-150m of Rockhills development and 100sqm of doorstep play facilities will be provided within 100-150m of Sydenham Gate to serve the dwellings at Sydenham Villas. The wider park setting offers further recreational opportunities, particularly for older children.

Compliance with the Development Plan

7.10.18 Drawing on the assessment set out above, the Proposed Development is considered to be compliant with London Plan Policies 7.2 and 7.3, BLP Policy 22, draft London Plan Policy D3 and the Mayor’s Accessible London SPG (Greater London Authority, 2014). It is also considered that the improvements to the Park will help the Council meet its aims set out in BLP Policy 20 to promote quality of life and the health and wellbeing of those living and working in the borough.

7.10.19 It is recognised that the Proposed Development will result in the loss of the Caravan Club facility from the Park. As noted above, efforts have been made to find alternative premises for this facility with the London Borough of Bromley. If this facility cannot be replaced, the loss will be contrary to adopted London Plan Policy 4.5. However, the removal of the Caravan Club site does enable 1.52ha of land to be returned to public accessibility within the Park, to the benefit of visitors and local communities.

7.11 The Natural Environment

Relevant Development Plan Policies

7.11.1 The following development plan policies are considered relevant to the consideration of development impacting the natural environment:
- London Plan Policy 5.10: Urban Greening
- London Plan Policy 5.11: Green Roofs and Development Site Enviorns
- London Plan Policy 7.20: Geological Conservation
- London Plan Policy 7.21: Trees and Woodlands
- BLP Policy 54: South East London Green Chain
- BLP Policy 69: Development and Nature Conservation Sites
BLP Policy 72: Protected Species
BLP Policy 73: Development and Trees
BLP Policy 74: Conservation and Management of Trees and Woodlands
BLP Policy 78: Green Corridors
BLP Policy 79: Biodiversity and Access to Nature

Assessment of the Proposed Development
7.11.3 The Proposed Development seeks to improve the current environment of the Park through improving landscaping, removing unnecessary hardstanding and car-parking within the Park.

7.11.4 Given Crystal Palace Park’s history, and its role as a show place for horticultural innovation, a rich and important ecology has evolved within the Park.

7.11.5 Furthermore, the Proposed Development seeks to strengthen the role of Capel Manor College, who have continued this horticultural tradition, within the Park as a centre for learning for countryside/ environment studies, arboriculture, horticulture and animal care. Students will be able to put their learning into practice within the Park helping to manage and improve the natural environment of the CPP.

The baseline ecology situation within the Application Site has been established through a desk study and ecological surveys including an extended phase 1 habitat survey, bat roost suitability assessment, bat emergence survey, bat activity surveys and reptile surveys.

The Application Site does not include or sit within any statutory site for nature conservation; however, a number of sites with statutory nature conservations designations are located within 5km of the Site. A large area of the Application Site is a Grade I Site of Interest for Nature Conservation (SINC) which is a non-statutory designation (Figure 7.5).

The outline planning application is supported by a number of ecological surveys which are reported on in more detail in the Environmental Statement. The Proposed Development has taken into account these surveys and will preserve and enhance the ecological value of the Park in order to achieve a net gain on biodiversity.

The Regeneration Plan honours the strong...
horticulture tradition and utilises it to boost the arboriculture and ecology of the Park through the delivery of a number of objectives which are set out in the Design and Access Statement:

- Understand the horticulture, ecology and trees within the Park through regular surveys and monitoring;
- Enhance the horticultural character of each park area to improve the overall horticultural, ecological and arboricultural value of the Park and provide a range of experiences. Seek opportunities to demonstrate innovation and enhance education;
- Maintain existing habitats, seeking opportunities to mitigate for any disturbance. Improve habitat diversity through creation of new habitats both within the Park and adjacent areas;
- Secure and improve connectivity between habitats both within the Park and surrounding areas; and
- Embed climate resilience and maintenance requirements in planting proposals.

7.11.10 The Design and Access Statement includes design principles specifically for horticulture, ecology and trees which will provide a framework to guide the development of the detailed scheme and aid the determination of the future reserved matters applications. In addition, the Landscape Strategy will create a framework for the provision of enhanced habitat to improve biodiversity, plan for climate change and biosecurity and guide future management and maintenance.

7.11.11 The Site is characterised by areas of amenity grassland separated by scattered trees and woodland and punctuated by artificial water bodies which increase the level of biodiversity within the Site. The habitats offer suitable habitat for native mammals, birds, invertebrates, reptiles, amphibians and plants. However, no great crested newts were found within the Site and the Site was not considered suitable to support other protected or notable species such as badgers, water vole or otter.

7.11.12 While the Proposed Development will result in a permanent reduction in total vegetated area, it is considered that this would have a negligible effect on the SINC and, overall, there will be an increase in the total number of trees and in habitat diversity improving biodiversity within the Site.

7.11.13 Draft London Plan Policy G5 Urban Greening sets out that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design. The Urban Greening Factor for the Proposed Development has been calculated in line with the requirement of Policy G5 and is show in Table 7.1 and Figure 7.6 on the following pages. This shows that the Proposed Development will result in an Urban Greening Factor of 0.47.

7.11.14 The outline planning application is accompanied by an Arboricultural Impact Assessment which is included as an appendix in the Environmental Statement. The Arboricultural Impact Assessment has established that the majority of trees within the Application Site are moderate and contribute significantly to the character of the Park and local amenity. There are a small number of notable trees within the Site.

7.11.15 The Proposed Development does involve the removal of a number of existing trees, as shown on Drawing 60553431_DWG_ZZ_013 (Vegetation Retention and Removal) which is submitted for approval. In summary, 158 trees, 21 full tree groups and part of 13 tree groups are to be removed to facilitate the Proposed Development. The majority of trees are Category B (moderate quality), but there will also be a loss of some Category A and Category C trees.

7.11.16 The trees that are proposed for removal are located mainly in the western section of the Site on the Upper and Lower Palace Terrace and in the north western corner of the site in the area currently occupied by the Caravan Club. Some tree removal is also proposed along the central axis to the west of the area occupied by the National Sports Centre. This is shown on drawing numbers 60553431-DWG-ZZ-013 (Vegetation Retention and Removal), CMC-F_103_P00 (Capel Manor College Farm Site Existing Vegetation Retention and Removal) and CMC-A_103_P00 (Capel Manor College Anerley Site Existing Vegetation Retention and Removal) which are submitted for approval. Tree removals will be mitigated with a robust and high-quality scheme of new tree planting and associated landscaping works as detailed in the DAS.

7.11.17 It is proposed to plant native trees, ornamental trees, informal trees and formal trees to
Table 7.1 Crystal Palace Park Urban Greening Factor Assessment

<table>
<thead>
<tr>
<th>Proposed Surface Cover Type</th>
<th>Factor</th>
<th>Area (sq.m)</th>
<th>Contribution</th>
</tr>
</thead>
<tbody>
<tr>
<td>Semi-natural vegetation (e.g., trees, woodland, species-rich grassland) maintained or established on site.</td>
<td>1</td>
<td>174,850</td>
<td>174,850</td>
</tr>
<tr>
<td>Wetland or open water (semi-natural; not chlorinated) maintained or established on site.</td>
<td>1</td>
<td>34,751</td>
<td>34,751</td>
</tr>
<tr>
<td>Rain gardens and other vegetated sustainable drainage elements.</td>
<td>0.7</td>
<td>14,167</td>
<td>9,917</td>
</tr>
<tr>
<td>Standard trees planted in pits with soil volumes less than two thirds of the projected canopy area of the mature tree.</td>
<td>0.6</td>
<td>1,887</td>
<td>1132</td>
</tr>
<tr>
<td>Amenity grassland (species-poor, regularly mown lawn).</td>
<td>0.4</td>
<td>236,204</td>
<td>94,482</td>
</tr>
<tr>
<td>Flower-rich perennial planting</td>
<td>0.7</td>
<td>69,289</td>
<td>48,502</td>
</tr>
<tr>
<td>Water features (chlorinated) or unplanted detention basins</td>
<td>0.2</td>
<td>1422</td>
<td>284</td>
</tr>
<tr>
<td>Sealed surfaces (e.g., concrete, asphalt, waterproofing, stone)</td>
<td>0</td>
<td>245,030</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total Site Area</strong></td>
<td><strong>777,600</strong></td>
<td><strong>363,918 / 777,600</strong></td>
<td><strong>0.47</strong></td>
</tr>
</tbody>
</table>

Source: AECOM

7.11.18 Policies within the London Plan and BLP encourage a proactive approach to the protection, enhancement, creation, promotion and management of biodiversity. Trees and woodland should be protected, maintained and enhanced and existing trees of value should be retained, especially where these trees are located within a Conservation Area. Development that could adversely impact protected species should be refused unless mitigation measures can be secured.

7.11.19 CPP also forms part of the South East London Green Chain where development proposals will be required to respect and not harm the character or function of the Green Chain; this may include the use of suitable screening, landscaping or the planting of native vegetation and enhancing of wildlife habitats.

**Compliance with the Development Plan**

7.11.20 Drawing on the assessment set out above, the Proposed Development is considered to be compliant with London Plan policies 7.19, 7.20 and 7.21 and BLP policies 34, 54, 69, 72, 73, 74, 78 and 79 in relation to the protection of trees, biodiversity and access to nature.
7.12 Inclusive Design and Public Realm

Relevant Development Plan Policies

7.12.1 The following development plan policies are considered relevant to the consideration of inclusive design:

- London Plan Policy 3.2: Improving Health and Addressing Health Inequalities
- London Plan Policy 7.2: An Inclusive Environment
- London Plan Policy 7.3: Designing Out Crime
- London Plan Policy 7.5: Public Realm
- BLP Policy 26: Health and Wellbeing
- BLP Policy 33: Access for All

7.12.2 In addition to the development plan draft London Plan Policy D3 Inclusive design, draft London Plan Policy D7 Public Realm and the Mayor’s Accessible London SPG (Greater London Authority, 2014) are of relevance for the consideration of inclusive design and accessibility.

Assessment of the Proposed Development

7.12.3 The London Plan Policy 7.2 requires that all new development in London achieves the highest standards of accessible and inclusive design to ensure that developments can be used safely, easily and with dignity by all regardless of disability, age, gender, ethnicity or economic circumstances. BLP Policy 33 requires that proposals are designed to ensure ease of access and movement for people with disabilities, both physical and sensory.

7.12.4 The incremental nature of interventions within the Park over many decades, combined with the introduction of the NSC and its ancillary
features, have resulted in a significantly fragmented landscape.

7.12.5 Movement around the Park is confused with poor connections and lack of legibility. Built features including the NSC and associated structures interrupt physical access and views reducing orientation. In addition, the significant changes in topography across the Park deter connectivity with difficult access between levels, often with no ramps or, where present, ramps that are steep and constructed of unsuitable surface materials. Barriers, including steps and gradients, also result in lengthy diversions in places. In other locations, defunct hard surfacing, fences and structures detract from the ability of visitors to easily move around the Park.

7.12.6 Furthermore, the surfacing varies from tarmac and concrete to a range of self-binding or bound aggregates. These materials vary in quality and are often unsuitable for the function of the area. The mix of surfacing creates a lack of unity throughout the Park. Existing signage is minimal, lacking co-ordination and poorly located, further exacerbating the poor legibility.

7.12.7 Together, these obstacles create an environment which is not truly inclusive. The Proposed Development provides an opportunity to rectify this so that it is a place that everyone – regardless of disability, age, gender, sexual orientation, pregnancy/maternity, race or faith – can enjoy confidently and independently with choice and dignity.

7.12.8 The spatial principles of the Regeneration Plan have been designed around creating a legible and coherent park-wide strategy which delivers a range of benefits. One of the key priorities of the Regeneration Plan is to enhance infrastructure throughout the Park to improve accessibility for all users. The DAS sets out park-wide Design Strategies which include the removal of parking and fences and the creation of a circulation system within the Park designed to accommodate a range of users and provide access for all which will secure a more accessible, pedestrian friendly environment.

7.12.9 The Proposed Development seeks to create an inclusive Park; installing ramps to provide step-free routes and where new routes are proposed using materials that facilitate accessibility for all users.

7.12.10 The Proposed Public Access, Circulation and Parking (Drawing Reference 60553431-DWG-ZZ-010) shows how the existing circulation routes will be rationalised to improve legibility and connectivity for all users of the Park. This plan and the Access - Inclusive Design Plan (Drawing Reference: 60553431-DWG-ZZ-016) which is not submitted for approval, but which is submitted in support of the application, show that step-free and all-weather surfaced routes will be provided throughout the site with step-free access between the terraces to the west of the site. Where new paths and ramps are provided these will be at a maximum gradient of 1 in 12, in accordance with British Standards, and paths will be a minimum of 2m wide, suitable for two people, one using a mobility device, to pass easily.

7.12.11 The Proposed Development has been designed in a way which seeks to design out crime and reduce the fear of crime among visitors to the Park. New pedestrian and cycle routes will be lit, and shrub clearance and new planting is intended to open up areas, maximise natural surveillance and minimise opportunities for anti-social behaviour.

7.12.12 The Park-wide measure seek to ensure the highest standards of accessible and inclusive design to ensure that developments can be used safely, easily and with dignity by all regardless of disability, age, gender, ethnicity or economic circumstances in compliance with planning policy.

7.12.13 With respect to the residential development the Parameter plans submitted for approval are of a sufficient size to ensure that the detailed scheme will be designed such that all units meet the standards set out in the Nationally Described Space Standards – with all units able to meet the ‘Baseline’ Quality and Design Standards outlined within Annex 1 of the Mayor of London’s Housing Supplementary Planning Guidance (March 2016). The Housing Design Intent section of the Design and Access Statement sets out that the minimum proposed gross internal area (GIA) of the new dwellings will follow the ‘Technical Housing Standards’ (2015) and the Wheelchair Homes Design Guide (2011) authored by the South-East London Housing Partnership.

7.12.14 10% of the residential units will be designed to minimum internal standards set out by the South East London Housing Partnership standards, which are considered best practice for wheelchair adaptable/accessible residential
units.

7.12.15 The Parameter plans for the community facility and cultural venue which are submitted for approval is of a sufficient size to ensure that the detailed scheme will be inclusively designed, meeting Building Regulations requirements in relation to accessibility of public buildings. The Design Principles within the DAS that accompanies the planning application sets out how inclusive design and lifetime neighbourhood principles are to be delivered within the Reserved Matters Application.

Compliance with the Development Plan
7.12.16 Drawing on the assessment set out above, the Proposed Development is considered to be compliant with London Plan Policies 7.2 and 7.3, draft London Plan Policy D3 and the Mayor’s Accessible London SPG (Greater London Authority, 2014). The Proposed Development improves inclusive access for all within the Park and particularly in the western area of the Park between the terraces where step-free access is currently poor. The Proposed Development has incorporated the principles of designing out crime by improving legibility and security throughout the Park and including, within the framework provided in the DAS, the principles of inclusive design.

7.13 Transport and Movement

Relevant Development Plan Policies
7.13.1 The following development plan policies are considered relevant to the consideration of transport and movement:

- London Plan Policy 6.1: Strategic Approach
- London Plan Policy 6.2: Providing Public Transport Capacity and Safeguarding Land for Transport
- London Plan Policy 6.3: Assessing Effects of Development on Transport Capacity
- BLP Policy 31: Relieving Congestion
- BLP Policy 32: Road Safety
- BLP Policy 33: Access for All
- BLP Policy 34: Highway Infrastructure provision
- BLP Policy 36: Safeguarding Land for Transport Investments
- BLP Policy 30: Parking

7.13.2 In addition to the development plan draft London Plan Policies T1 Strategic approach to transport, T2 Healthy streets, T3 Transport capacity, connectivity and safeguarding, and T4 Assessing and mitigating transport impacts, T6 Car parking and T6.1 Residential parking are of relevance for the consideration of transport and movement.

Assessment of the Proposed Development
7.13.3 The Transport Assessment which accompanies this planning application and the Transport and Access chapter of the Environmental Statement (Chapter 12) submitted in support of this application provide further detail on the transport impacts which are envisaged as a result of the Proposed Development.

7.13.4 An overarching principle of the Regeneration Plan is to promote sustainable access to and within the Park, with car-based trips discouraged wherever possible. The use of public transport and active travel modes will be encouraged in line with development plan policy. A Visitor Travel Plan and Interim Residential Travel Plan accompany this planning application and set out measures to encourage visitors to use sustainable means of transport and reduce private car usage.

In terms of highways, the anticipated total vehicular trip generation as a result of the Proposed Development suggest there will be an additional 33 two-way vehicle trips in the AM peak hour and 35 two-way vehicle trips in the PM peak hour. These trips will be spread across the site with the residential aspects located on the northern edge of the site, Capel Manor College to the south and the Cultural Centre in the west.

7.13.6 For the residential dwellings, it is expected that the highest proportion of trips to work will be via public transport with only 20% of all trips to work by driving a car. It is not therefore considered that the residential dwellings will result in a significant impact on the surrounding highway network.

7.13.7 The Proposed Development will result in a net loss of 211 standard car parking spaces from within CPP. 338 public car parking spaces will be removed across the Park; however, 127 residential car parking spaces will be created for the residential development proposed at Rockhills and Sydenham Villas. The Proposed Development will result in the net gain of two accessible spaces, and 6 active electric spaces.
7.13.8 Key to the realisation of the Regeneration Plan is the removal of car parking areas which presently dominates the centre of the Park, to the detriment of the function and attractiveness of the Park. The greatest loss of car parking will be within the Transitional Landscape area of the Park where it is proposed to remove both the Transitional Landscape car park and overflow car park in order to restore this area to parkland, increasing the quantity of MOL accessible to the public. Parking at Penge car park and Sydenham Gate car park will be reduced; however, a new area of public car parking will be provided at Rockhills as well as a designated coach parking area. The overall reduction of public car parking within the Park is considered appropriate and will not result in additional parking pressure off-site. Two sites have been identified within the Transitional Landscape to accommodate temporary managed car parking during events.

7.13.9 Residential car parking will be provided at a ratio of 0.6 spaces per dwellings. This reflects advice received from the London Borough of Bromley and is consistent with Draft London Plan 2019 maximum residential car parking standards given that the residential sites have a PTAL rating of 3. 84 spaces will be located at Rockhills (including 10 disabled spaces) and 43 at Sydenham Villas (including 4 disabled spaces). While it is not proposed to provide dedicated car parking for the relocated nursery, a new car park will be provided at Rockhills adjacent to the residential and nursery development. The Proposed Development at Capel Manor College will result in a lower provision of parking; however, it is considered that this is appropriate given the location of the college and further promotion of sustainable modes of transport.

Compliance with the Development Plan

7.13.10 Drawing on the assessment set out above, the Proposed Development is considered to be compliant with local plan and London Plan policies in terms of both promoting and supporting active travel modes and public transport usage, and in assessing and highways impact and proposing mitigation measures where necessary.

7.13.11 In terms of parking, the number of residential parking places proposed falls below the standard expected under London Borough of Bromley policy. However, the 0.6 ratio has been discussed with the London Borough of Bromley and complies with draft London Plan policy.

7.14 Walking and Cycling

Relevant Development Plan Policies

7.14.1 The following development plan policies are considered relevant to the consideration of walking and cycling:

- London Plan Policy 6.1: Strategic Approach
- London Plan Policy 6.9: Cycling
- London Plan Policy 6.10: Walking
- BLP Policy 31: Relieving Congestion
- BLP Policy 33: Access for All

7.14.2 In addition to the development plan draft London Plan Policy T5 Cycling is of relevance for the consideration of walking and cycling.

Assessment of the Proposed Development

7.14.3 In order to promote walking and cycling as sustainable modes of access to and within the Park, pedestrian and cycle movement within the Application Site will take priority over other forms of transport.

7.14.4 The Design and Access Statement includes Park-wide design strategies seeking to deliver the following objectives for circulation and connectivity (in relation to pedestrians and cyclists):

- Encourage the use of sustainable forms of transport such as walking, cycling and public transport to travel to the Park;
- Create inviting gateways into the Park both through improvements within the Park and in the adjacent urban environment to facilitate access for all users and reinforce the Park as a welcoming place;
- Improve access into the Park for all users through a series of measures including enhancing entrances, better connections and sensitive surfacing and way finding;
- Provide an integrated and safe pedestrian, cycle and vehicular circulation system to connect entrances into the Park with destinations;
- Make destinations within the Park accessible for everyone with extensive accessible routes and gentle gradient circulation route;
- Reduce the dominance of parking by relocating car and coach parks to the edges of the Park;
– Provide suitable facilities for cycle parking in the Park close to key destinations and at entrances into the Park; and
– Minimise vehicular movement within the Park by identifying shortened servicing and emergency routes and restricting vehicle access to the area around the NSC.

7.14.5 The Design and Access Statement also includes design principles specifically for circulation and connectivity which provide a framework to guide the development of the detailed schemes and aid the determination of the future reserved matters applications.

7.14.6 Drawing number 60553431-DWG-ZZ-010 (Public Access, Circulation and Parking Plan) is submitted for approval. This drawing details the location of pedestrian, cyclist and vehicular entrances to CPP as well as the hierarchy of routes through the Park for the various modes of transport. To demonstrate the commitment to achieving an inclusive environment that prioritises pedestrian journeys drawing number 60553431-DWG-ZZ-016 (Access - Inclusive Design) details the proposed step free, all weather surface routes throughout the Park which will ensure all pedestrians can easily travel throughout the Park. The pedestrian routes will be rationalised to aid legibility and will link key public transport connections to points of interest, both within and outside of the Application Site.

7.14.7 Works are proposed to enhance the entrances to the Park for the benefit of pedestrians and cyclists. It is proposed to remove walls and gates at Norwood Gate; to renovate the existing entrance at Old Cople Lane which is not currently publicly accessible; provide pedestrian and cycle access to the Park at Sydenham Gate; and remove the sub-station, walls and planting at Penge Gate to improve pedestrian and cycle access at Penge Gate. Rockhills will also be permeable for pedestrians and cyclists providing additional points of entry to the Park; this has been captured within the Design Principles included within the Design and Access Statement.

7.14.8 The Transport Assessment confirms that existing pedestrian routes to local bus stops and amenities would not be altered by the Proposed Development. In fact, the pedestrian environment within the Park will be significantly enhanced by the proposed accessibility improvements throughout the Park. A Visitor Travel Plan accompanies this planning application and sets out measures to encourage visitors to use sustainable means of transport and reduce private car usage.

7.14.9 Cycle access is provided for throughout the Application Site linking to the proposed Quietway 7 linking to Elephant & Castle.

7.14.10 Cycle access is provided for throughout the Application Site linking to the proposed Quietway 7 linking to Elephant & Castle.

7.14.11 153 existing cycle parking facilities will be retained. 207 additional cycle parking will be provided at the following locations:
– Rockhills entrance
– Sydenham Gate
– Norwood Gate
– Anerley Hill and the cultural venue
– the re-sited Park Ranger’s Maintenance Depot

7.14.12 Overall, the total amount of public cycle parking within the Park on completion of the Proposed Development will be 360 spaces, more than double what currently exists.

7.14.13 Cycle parking for the residential development is provided in line with TfL’s adopted maximum cycle parking standards referred to in the emerging London Plan. At this stage it is assumed that the level of provision will be 252 long stay and 18 short stay cycle parking spaces at Rockhills and 128 long-stay and 8 short-stay cycle parking spaces at Sydenham Villas. However, detailed proposals for residential cycle parking will be provided under reserved matters applications in secure and convenient locations within each development plot and the illustrative material indicates that this can be achieved.

Compliance with the Development Plan
7.14.14 Drawing on the assessment set out above, the Proposed Development is considered to be compliant with London Plan policies 6.1, 6.9 and 6.10 and BLP policies 31 and 33, focusing on improving cycling and pedestrian access around and to the Park.

7.15 Sustainable Design and Construction

Relevant Development Plan Policies
7.15.1 The following development plan policies are considered relevant to the consideration of sustainable design and construction:
– London Plan Policy 5.3: Sustainable Design and Construction
– BLP Policy 37: General Design of Development
− **BLP Policy 123**: Sustainable Design and Construction
− **BLP Policy 124**: Carbon Dioxide Reduction, Decentralised Energy Networks and Renewable Energy

7.15.2 In addition to the development plan draft London Plan policy SI 3 Energy infrastructure, SI 4 Managing Heat Risk, SI 5 Water infrastructure, SI 7 Reducing waste and supporting the circular economy, SI 13 Sustainable drainage and the Mayor’s Sustainable Design and Construction SPD (2014) is of relevance for the consideration of sustainable design and construction.

Assessment of the Proposed Development

7.15.3 A Sustainability Statement and Energy Statement are submitted in support of the outline planning application and set out a broad approach to environmental management. The Sustainability Statement broadly follows the topic structure set out in the Mayor of London’s Design and Construction SPG (2014) and summarises the sustainability measures that will be integrated into the development proposals. The Energy Statement sets out the proposed strategy for reducing the energy use of the Proposed Development, for utilising low carbon and renewable energy sources, for reducing cooling demands and for maintaining comfortable conditions for residents and building users.

7.15.4 Chapter 4 of the Environmental Statement also sets out information regarding environmental impact and management during the construction process, including segregation of waste streams where feasible.

7.15.5 The outline nature of the design means that many of the sustainability features that would be expected within a full application cannot be specified at this stage. However, the Sustainability Strategy sets out a number of measures which should be considered and integrated into the future design of buildings where appropriate, including:

− Optimising the layout, orientation and massing for solar access, microclimate, wind, and sources of external noise and pollution, in order to maximise natural ventilation and minimise requirements for heating, cooling, and artificial lighting;
− Improved insulation standards for walls, roofs, glazing and floors;
− Improved air-tightness and thermal bridging details;
− Effective façade design including, where appropriate, fixed external shading, adjustable internal shading and use of glazing with high light transmittance and low solar heat gain factors;
− Incorporation of thermal mass, where appropriate, to store heat in winter and reduce the risk of overheating in summer;
− Consideration of night ventilation to pre-cool building structures requiring window and shutter arrangements that allow ventilation at night without compromising security.

7.15.6 The Sustainability Strategy also sets out an outline approach to sustainable water management, including Sustainable Urban Drainage Systems, and minimising water consumption.

7.15.7 The Design and Access Statement includes a number of Park-wide strategies to deliver sustainability, including:

− Planting to follow best practice guidance for sustainability in choice of plant species, mix, planting specification and future resource requirements, including water;
− Embed sustainability principles into park infrastructure where materials are sparingly used and recycled, durable and responsive to local conditions;
− Design and construction of buildings that follows best practice guidance for sustainability.

7.15.8 Future developers will be required to provide sufficient analysis and information as part of their reserved matters applications to demonstrate that the sustainability commitments established at outline stage will be achieved.

Compliance with the Development Plan

7.15.9 The outline nature of the design means that many of the sustainability features that would be expected within a full application cannot be specified at this stage. However, drawing on the assessment set out above, the Proposed Development is considered to be compliant with development plan policies in respect of sustainable design and construction.

7.16 Environmental Resources

Relevant Development Plan Policies
The following development plan policies are considered relevant to the consideration of regeneration:

- London Plan Policy 5.2: Minimising Carbon Dioxide Emissions
- London Plan Policy 5.3: Sustainable Design and Construction
- London Plan Policy 5.4: A Electricity and Gas Supply
- London Plan Policy 5.6: Decentralised Energy in Development Proposals
- London Plan Policy 5.7: Renewable Energy
- London Plan: Policy 5.9: Overheating and Cooling
- London Plan Policy 5.12: Flood Risk Management
- London Plan Policy 5.13: Sustainable Drainage
- London Plan Policy 5.14: Water Quality and Wastewater Infrastructure
- London Plan Policy 5.15: Water Use and Supplies
- London Plan Policy 5.18: Construction, Excavation and Demolition Waste
- London Plan Policy 5.21: Contaminated Land
- London Plan Policy 7.14: Improving Air Quality
- BLP Policy 113: Waste Management in New Development
- BLP Policy 115: Reducing Flood Risk
- BLP Policy 116: Sustainable Urban Drainage Systems (SUDS)
- BLP Policy 117: Water and Wastewater Infrastructure Capacity
- BLP Policy 118: Contaminated Land
- BLP Policy 120: Air Quality
- BLP Policy 123: Sustainable Design and Construction
- BLP Policy 124: Carbon Dioxide Reduction, Decentralised Energy Networks and Renewable Energy


Assessment of the Proposed Development

The outline nature of the design means that many of the sustainability features relating to environmental resources that would be expected within a full application cannot be specified at this stage.

A Sustainability Statement and Energy Statement are submitted in support of the outline planning application and set out a broad approach to environmental management. Chapter 4 of the Environmental Statement also sets out information regarding environmental impact and management during the construction process, including segregation of waste streams where feasible.

The Sustainability Strategy sets out an outline approach to sustainable water management, including Sustainable Urban Drainage Systems, and minimising water consumption.

It also sets out that consideration will be given to the local sourcing of materials, the use of reclaimed or recycle materials and pre-fabrication or other forms of offsite construction. Any timber used within the Proposed Development will be sourced in accordance with the UK Government’s timber procurement strategy.

Target for recycling, waste segregation and diverting waste from landfill will be set at a later stage. Waste management during demolition and construction stages will follow best practice principles. Further information about the construction process is set out in the Chapter 4 of the Environmental Statement.

The proposed Energy Strategy for the development follows the steps set out in the London Plan energy hierarchy: to be lean (use less energy); clean (supply energy efficiently); green (use renewable energy); and to offset.

The proposed new homes and non-residential buildings will be designed to high levels of energy efficiency to reduce energy use and supply energy efficiently. The Sustainability Strategy sets out a number of measures to address this which should be integrated into the future design of buildings where appropriate.

Compliance with the Development Plan

The outline nature of the design means that many of the sustainability features that would be expected within a full application cannot be specified at this stage. However, drawing on the assessment set out above, the Proposed Development is considered to be compliant with development plan policies in respect of sustainable design and construction.
8. Planning Obligations

8.1.1 As developer responsible for the delivery of the Regeneration Scheme, the London Borough of Bromley envisages entering into a unilateral undertaking in relation to the following topics:

- Restrictions on use of capital receipts from the enabling development such that they can only be used to deliver the Regeneration Scheme;
- Restrictions on the timing of residential development until the appropriate Regeneration Scheme works have been delivered;
- Highways improvements;
- Use of community facility at Rockhills;
- Employment and training initiatives;
- Residential travel plan;
- Non-residential travel plan;
- Financial contribution to healthcare facilities;
- Financial contribution to education facilities;
- Financial contribution for planning obligation monitoring;
- Financial contribution for legal services.
PLANNING BALANCE
9. Planning Balance

9.1.1 This Planning Statement, and the suite of supporting application documents submitted in support of the Planning Application, demonstrates the case in support of the Proposed Development.

9.1.2 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

9.1.3 Section 7 of this Planning Statement has demonstrated that the Proposed Development is in accordance with the vast majority of relevant policies in the statutory development plan and will amount to sustainable development in accordance with the NPPF. Section 7 has also identified those development plan policies which the Proposed Development does not comply with fully.

9.1.4 In considering the planning application, the LPA needs to consider the development plan as a whole, and therefore some non-compliance with individual policies does not mean that a proposal conflicts with the plan overall. In particular, one of the key objectives of the development plan is to preserve, enhance and raise awareness of the Borough’s heritage. The development plan recognises that the Borough has a fine heritage of historic buildings and landscapes, all of which make an important contribution to its character. Many such buildings are in areas of architectural or historic interest, which add to the attractiveness of the Borough and give a sense of continuity with the past.

9.1.5 Importantly, the Proposed Development is compliant with the overarching objective of development plan policies to preserve, enhance and raise awareness of the Borough’s heritage. However, it is recognised that the proposals are not fully compliant with some local policies in that there will be some detrimental effect on MOL. The Proposed Development is also non-compliant with respect to the lack of provision of affordable housing; the reason for the inability to provide affordable housing has been set out by the Applicant. Notwithstanding these issues, the Proposed Development will achieve the removal of a number of significant heritage assets from the Heritage at Risk Register and will make a major contribution to the removal of the Grade II* listed Registered Park and Garden from the Heritage at Risk register. The Proposed Development will secure CPP’s long-term and sustainable management in perpetuity. Furthermore, it is anticipated that it will contribute to London’s visitor economy and to the social and economic prosperity of the local community.

9.1.6 Accordingly, a decision to approve planning permission for the Proposed Development would be in accordance with the development plan when read as a whole.

9.1.7 If it is considered by the LPA that a decision to grant planning permission would not be in accordance with the development plan when read as a whole, a number of material considerations, as set out below, would indicate that planning permission should be granted.

Heritage benefits

9.1.8 The Proposed Development will provide significant heritage benefits, improving the condition of the Grade II* listed Registered Park and Garden, including:
  − Arresting the deterioration of the heritage assets within CPP and the Park as a whole;
  − Restoring the iconic design which is of considerable distinction and merit recognising its historic importance and raising its profile as a visitor destination within London;
  − Ensuring that the Park is restored to a place of recreation, leisure, discovery and learning for the benefit of the local and wider community celebrating its history while providing modern, fit for purpose facilities;
  − Provide greater opportunities for local residents to actively engage with the historical and recreational opportunities offered by the Park.

Community benefits

9.1.9 In terms of community benefits the proposed development will:
  − Improve the contribution of CPP to the local and London economy through increased visitors and their associated spending;
  − Enhance facilities to ensure that CPP is a place that everyone – regardless of disability, age, gender, sexual orientation, race or faith – can enjoy confidently and independently with choice and dignity.

9.1.10 Specifically, measures will:
– remove barriers between areas of the Park;
– enhance circulation routes including adaptations to ensure the ease of use for all abilities;
– open up views;
– integrate points of interest, facilities and events; and
– create a clear but not overly formal organisation of the Park based on Paxton’s principles.

9.1.11 The above measures will ensure that the Park will become a focus of local community activity and a significant attractor in the wider region and will encourage social cohesion.

Overall planning balance

9.1.12 It is concluded that a decision to approve planning permission for the Proposed Development would be in accordance with the development plan when read as a whole. On this basis, the significant benefits of the Proposed Development add even greater weight to the case in favour of approving planning permission. Should it be concluded, however, that a decision to approve planning permission would not be in accordance with the development plan when read as a whole, the significant heritage benefits (including local, regional, national and internationally significant heritage benefits) of the Proposed Development constitute material considerations, which would clearly outweigh any lack of compliance with the development plan and indicate that planning permission should be approved nonetheless.