

Our Ref: Project No. 60553431

18 September 2020

Claire Brew
Development Management
London Borough of Bromley
Civic Centre,
Stockwell Close,
Bromley, BR1 3UH

Dear Claire

Outline Planning Application for Proposed Development at Crystal Palace Park, Thicket Road, London SE20 8DT (Application Ref. 20/00325/OUT) – Resubmission September 2020

I am pleased to enclose a suite of information which comprises a Planning Resubmission in response to issues raised on the above planning application, submitted in January 2020. The material which comprises this Planning Resubmission is set out below.

One purpose of the Planning Resubmission is to amend the description of development for which planning permission is sought, to the following:

“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 2300 sqm for a cultural venue (Use Class D2);*
- *up to 530 sqm of park maintenance facilities (Sui Generis) including the dismantling and reconstruction of existing maintenance depot;*
- *up to 150 sqm information centre (Use Class D1); up to 670sqm for a community centre (Use Class D1);*
- ~~*up to 737 sqm of educational institution at the Capel Manor College Anerley Hill Site (Use Class D1);*~~
- *up to 3,779 sqm of educational institution at the Capel Manor College Farm Site (Use Class D1) of which 3,399 sqm comprises educational buildings and 380sqm comprises ancillary shelters/ outbuildings; and*
- *up to 16,352 sqm 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.”

The two changes to the description of development for which planning permission is sought are:

- Removal of the previously proposed development of up to 737 sqm of educational accommodation (Use Class D1) for Capel Manor College at the Anerley Hill site. (The proposed development of educational floorspace for Capel Manor College at the Farm site remains part of the proposals for which planning permission is sought); and
- Reduction in the maximum floorspace for residential development (Use Class C3) for which planning permission is sought from up to 18,847 sqm to up to 16,352 sqm. The revised floorspace is still intended to deliver 210 new homes, and the proposed maximum physical parameters of the residential development are unchanged. This amendment brings the maximum residential floorspace proposed in line with the scale of development considered within the Enabling Development and Financial Viability Assessment report which accompanies the outline planning application, as summarized in the table below.

Sites	Net Saleable Area (NSA (sq. ft.))	Gross Internal Area (GIA (sq. ft.))	NSA (sq. m.)	GIA (sq. m.)	Gross External Area (GEA) (sq.m.)
Rockhills	88,770	104,435	8,247	9,702	10,672
Sydenham Villas	47,243	55,580	4,389	5,164	5,680
Total	136,013	160,015	12,636	14,866	16,352

In addition, the revised soft landscaping and hard landscaping parameter plans forming part of the Planning Resubmission include slightly modified max/min percentages of hard and soft landscaping in some areas of the Park. This reflects a modest shift towards delivering more soft landscaping in comparison to hard landscaping than under the previous proposals shown on the original parameter plans. The table appended to this letter provides maximum and minimum areas for soft and hard landscaping and built development for each of the areas of the park, based on the revised proposed soft and hard landscape parameter plans. The figures in the appended table supersede those presented in the Design and Access Statement submitted in support of the Outline Planning Application in January 2020.

The Planning Resubmission also proposes a slight reduction in the amount of non-residential car parking within the Park, as shown in the revised parking drawings submitted for information, listed below.

The resubmission material comprises the following material:

Revised Plans for Approval:

Drawing Title	Reference
Proposed Topography	60553431-DWG-ZZ-005 - 01
Proposed Soft Landscaping	60553431-DWG-ZZ-007 - 01
Proposed Hard Landscaping	60553431-DWG-ZZ-009 - 01
Proposed Public Access, Circulation and Parking	60553431-DWG-ZZ-010 - 01
Proposed Servicing, Access and Circulation	60553431-DWG-ZZ-011 - 01
Proposed Built Development and Land Use	60553431-DWG-ZZ-012 - 01
Proposed Vegetation Retention and Removal	60553431-DWG-ZZ-013 - 01

Revised Document for Approval:

- Revised Development Specification and Framework (September 2020)

Revised Plans for Information:

Drawing Title	Reference
Illustrative Regeneration Plan	60553431-DWG-LA-001 - 01
Crystal Palace Park Existing Parking Plan (part of Transport Assessment Appendix D – Final Parking Figures)	60553431-DWG-0001-F
Proposed Parking Plan (part of Transport Assessment Appendix D – Final Parking Figures)	60553431-SKE-C-0002-G
Net Change of Parking Plan (part of Transport Assessment Appendix D – Final Parking Figures)	0553431-SKE-C-0003-F

The following Supporting Documents are submitted in response to a request under Regulation 25 of the EIA Regulations, and other requests from the local planning authority:

- Revised ES Non-Technical Summary
- Revised ES Chapter 2 (EIA methodology)
- Revised ES Chapter 3 (Alternatives & design evolution)
- Revised ES Volume 2 Appendix 7-B Arboricultural Impact Assessment_Part_5_Rev 01
- Revised ES Volume 2 Appendix 7-B Arboricultural Impact Assessment_Part_6_Rev 01
- Environmental Statement Clarifications Report
- Environmental Statement Addendum Letter
- Enabling Development and Financial Viability Assessment (60553431-REP-ZZ-006 Rev 01)

Summary of Planning Application Information

Following this September 2020 Planning Resubmission, the tables below set out the documents and plans that are currently submitted for Approval and those that are submitted in support of the application.

For Approval - The following information is submitted for approval. Where a revision is shown in the final column of the table, this supersedes the original information.

Drawing / Document	Reference	Revision
Documents for Approval		
Planning Application Form, Certificates and Notices		
Development Specification & Framework	60553431-REP-PL-003	60553431-REP-PL-003 Rev 01
Plans for Approval		
Parameter Plans comprising:		
Planning Application Boundary	60553431-DWG-ZZ-001	No revision
Structures and Surfacing to be Demolished (March 2020)	60553431-DWG-ZZ-003 - 01	No revision
Proposed Topography	60553431-DWG-ZZ-005	60553431-DWG-ZZ-005 - 01
Proposed Soft Landscaping	60553431-DWG-ZZ-007	60553431-DWG-ZZ-007 - 01
Proposed Hard Landscaping	60553431-DWG-ZZ-009	60553431-DWG-ZZ-009 - 01
Proposed Public Access, Circulation and Parking	60553431-DWG-ZZ-010	60553431-DWG-ZZ-010 - 01
Proposed Servicing, Access and Circulation	60553431-DWG-ZZ-011	60553431-DWG-ZZ-011 - 01
Proposed Built Development and Land Use	60553431-DWG-ZZ-012	60553431-DWG-ZZ-012 - 01
Proposed Vegetation Retention and Removal	60553431-DWG-ZZ-013	60553431-DWG-ZZ-013 - 01
Building Specific Plans		
Cultural Venue – proposed maximum building footprint and envelope (May 2020)	60553431-DWG-ZZ-014 - 01	No revision

Ranger's Maintenance Buildings	60553431-DWG-ZZ-017	No revision
Information Centre Site Plan	AOC_241_GA 010	No revision
Information Centre Proposed Arrangements	AOC_241_GA 101	No revision
Rockhills Residential Parameter Plans	1705_RR_110	No revision
Rockhills Residential Parameter Elevations	1705_RR_111	No revision
Sydenham Villas – Parameter Plans	1705_SV_110	No revision
Capel Manor College Anerley Site Existing Structures and Surfacing to be Removed	CMC-A_102_P00	Plan withdrawn
Capel Manor College Anerley Site Existing Vegetation Retention and Removal	CMC-A_103_P00	Plan withdrawn
Capel Manor College Anerley Site Proposed Built Development and Land Use	CMC-A_110_P00	Plan withdrawn
Capel Manor College Anerley Site Proposed Building Envelope and Sections	CMC-A_111_P00	Plan withdrawn
Capel Manor College Anerley Site Proposed Soft and Hard Landscaping	CMC-A_112_P00	Plan withdrawn
Capel Manor College Anerley Site Proposed Public Access and Inclusive Design	CMC-A_113_P00	Plan withdrawn
Capel Manor College Anerley Site Proposed Servicing Access and Circulation	CMC-A_114_P00	Plan withdrawn
Capel Manor College Farm Site Existing Structures and Surfacing to be Removed	CMC-F_102_P00	No revision
Capel Manor College Farm Site Existing Vegetation Retention and Removal	CMC-F_103_P00	No revision
Capel Manor College Farm Site Proposed Built Development and Land Use	CMC-F_110_P00	No revision
Capel Manor College Farm Site Proposed Building Envelope and Sections	CMC-F_111_P00	No revision
Capel Manor College Farm Site Proposed Soft and Hard Landscaping	CMC-F_112_P00	No revision
Capel Manor College Farm Site Proposed Public Access and Inclusive Design	CMC-F_113_P00	No revision
Capel Manor College Farm Site Proposed Servicing Access and Circulation	CMC-F_114_P00	No revision
Highways Drawings comprising:		
Crystal Palace Park General Arrangements Anerley Hill Entrance	60553431-M1.013-SK001	No revision
Crystal Palace Park General Arrangements Penge Gate Entrance	60553431-M1.013-SK003	No revision
Crystal Palace Park General Arrangements Sydenham Villas 1	60553431-M1.013-SK005	No revision
Crystal Palace Park General Arrangements Sydenham Villas 2	60553431-M1.013-SK007	No revision
Crystal Palace Park General Arrangements Sydenham Gate Entrance	60553431-M1.013-SK009	No revision
Crystal Palace Park General Arrangements Rockhills Residential	60553431-M1.013-SK011	No revision
Crystal Palace Park General Arrangements Rockhills Gate	60553431-M1.013-SK013	No revision

Supporting Documents and Drawings - The following information is submitted as contextual / illustrative information in support of the planning application. Where a revision is shown in the final column this supersedes the original information.

Drawing / Document	Reference	Revision
Supporting Documents		
Planning Statement	60553431-REP-PL-002	No revision
Enabling Development and Financial Viability Assessment	60553431-REP-ZZ-006	60553431-REP-ZZ-006 Rev 01

Design and Access Statement	60553431-REP-ZZ-001	No revision
Flood Risk Assessment and Outline Drainage Strategy	60553431-REP-DR-001	No revision
Energy Statement	60553431-REP-EN-001	No revision
Environmental Statement Volume 1	60553431-REP-ES-001	Revised ES Chapter 2 (EIA methodology) Revised ES Chapter 3 (Alternatives & design evolution)
Environmental Statement Volume 2	60553431-REP-ES-002	Revised ES Volume 2 Appendix 7-B Arboricultural Impact Assessment_Part_5_Rev 01 Revised ES Volume 2 Appendix 7-B Arboricultural Impact Assessment_Part_6_Rev 01
Environmental Statement Non-Technical Summary	60553431-REP-ES-003	60553431-REP-ES-003 Rev 01
Environmental Statement Clarifications Reprt		
Environmental Statement Addendum letter		
Heritage Statement	60553431-REP-CA-003	No revision
Revised Heritage Statement (submitted May 2020)	60553431-REP-CA-004	
Lighting Strategy	60553431-REP-LI-001	No revision
Statement of Community Involvement	60553431-REP-CO-001	No revision
Sustainability Statement	60553431-REP-SU-001	No revision
Transport Assessment	60553431-REP-TR-001	No revision
Interim Residential Travel Plan	60553431-REP-TR-002	No revision
Visitor Travel Plan	60553431-REP-TR-003	No revision
Supporting Plans		
Existing topography	60553431-DWG-ZZ-004	No revision
Existing soft landscaping	60553431-DWG-ZZ-006	No revision
Existing hard landscaping	60553431-DWG-ZZ-008	No revision
Illustrative Regeneration Plan	60553431-DWG-LA-001	60553431-DWG-LA-001 - 01
Character Areas	60553431-DWG-ZZ-002	No revision
Cultural Venue Indicative floor plans and cross sections	60553431-DWG-ZZ-015	No revision
Access - Inclusive Design	60553431-DWG-ZZ-016	No revision
Proposed Cut and Fill Plan	60553431-DWG-ZZ-018	No revision
Rockhills Residential Access, circulation and parking	1705_RR_100	No revision
Rockhills Residential_Proposed G+0	1705_RR_101	No revision
Rockhills Residential_Proposed G+1	1705_RR_102	No revision
Rockhills Residential_Proposed G+2	1705_RR_103	No revision
Rockhills Residential_Proposed G+3	1705_RR_104	No revision
Rockhills Residential_Proposed G+4	1705_RR_105	No revision
Rockhills Residential Section	1705_RR_113	No revision
Rockhills Residential_Proposed North Elevation	1705_RR_114	No revision
Rockhills Residential_Proposed South Elevation	1705_RR_115	No revision
Rockhills Residential_Proposed North Elevation (no context)	1705_RR_116	No revision

Rockhills Residential_Proposed South Elevation (no context)	1705_RR_117	No revision
Sydenham Villas Residential_Access, circulation and parking	1705_SV_100	No revision
Sydenham Villas Residential_Floor Plans Villa 1	1705_SV_101	No revision
Sydenham Villas Residential_Floor Plans Villa 3	1705_SV_102	No revision
Sydenham Villas Residential_Sketch Elevation	1705_SV_122	No revision
Sydenham Villas Residential_Sketch Park Elevation	1705_SV_124	No revision
Capel Manor College Anerley Site Existing Site Plan and Topography	CMC-A_100_P00	No revision
Capel Manor College Anerley Site Existing Soft and Hard Landscaping	CMC-A_101_P00	No revision
Capel Manor College Farm Site Existing Site Plan and Topography	CMC-F_100_P00	No revision
Capel Manor College Farm Site Existing Soft and Hard Landscaping	CMC-F_101_P00	No revision
CMC Cut and Fill - Anerley Site	669956-MLM-ZZ-XX-DR-C-0102	Plan withdrawn
CMC Cut and Fill - Farm Site	669956-MLM-ZZ-XX-DR-C-0103	No revision

Metropolitan Open Land / Very Special Circumstances

The Planning Statement submitted in support of the outline planning application in January 2020 recognised that the vast majority of Crystal Palace Park is designated Metropolitan Open Land (MOL). The Planning Statement acknowledged that some aspects of the proposed development do constitute inappropriate development within Metropolitan Open Land. These elements include the proposed development of educational facilities for Capel Manor College (CMC) at Anerley Hill and the Farm Site (paragraph 7.3.31).

Paragraphs 7.4.16 to 7.4.21 summarise the significant public benefits that the development of these sites would bring, including:

- 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 CMC will also work alongside park management and maintenance to support the management of the Park.

It was concluded that these Very Special Circumstances outweigh harm to the openness of the MOL associated with this proposed development (paragraph 7.4.21).

The removal of the proposed development of the Anerley Hill site from the scheme for which planning permission is sought will significantly reduce the amount of inappropriate development within MOL. However, the majority of the benefits above will be achieved through the redevelopment of the Farm


Site. The revised proposals for the Anerley Hill site will involve removal of the many small poor-quality structures (containers and derelict building) in this area and other improvements which will enhance this area, to be used as a maintenance and storage area for the Park.

Overall, it is concluded that the removal of the proposed development for CMC buildings at Anerley College will reduce the scale of inappropriate development in MOL, whilst the continued development of the Farm Site will deliver many of the benefits which constitute very special circumstances to justify the development of the remaining facilities at the Farm Site.

If you have any queries about this planning application resubmission, please do not hesitate to contact me on the details provided. I would be grateful if you could provide written confirmation of receipt of the application at your earliest convenience.

I look forward to working with you during the determination period to achieve a successful outcome.

Yours sincerely



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cc Lizzi Hewitt-Brown, London Borough of Bromley
Jake Hamilton, London Borough of Bromley
Kathryn Whitmore, AECOM

CRYSTAL PALACE PARK - REVISED MAXIMUM / MINIMUM SOFT / HARD LANDSCAPE AREAS

(Based on Revised Proposed Soft Landscape Parameter Plan (60553431-DWG-ZZ-007-01) & Revised Proposed Hard Landscape Parameter Plan (60553431-DWG-ZZ-009-01) (SEPTEMBER 2020)

Comparison of Areas sqm January 2020 & September 2020	Area A Anerley Hill Edge		Area B Palace Terrace		Area C Italian Terraces		Area D Transitional Landscape		Area F Tidal Lakes		Area G Cricket Ground		Area H English Landscape		Area I Paxton Axis		Total		Difference
	Jan-20	Sep-20	Jan-20	Sep-20	Jan-20	Sep-20	Jan-20	Sep-20	Jan-20	Sep-20	Jan-20	Sep-20	Jan-20	Sep-20	Jan-20	Sep-20	Jan-20	Sep-20	
Total area of character area	26,489	26,489	58,789	58,789	72,325	72,325	147,474	147,474	89,902	89,902	99,409	99,409	167,641	167,641	26,489	26,489	688,518	688,518	
Total area of existing hard landscape	20,066	20,066	9,994	9,994	13,019	13,019	38,343	38,343	22,687	22,687	10,935	10,935	26,823	26,823	9,545	9,545	151,412	151,412	
Total area of existing soft landscape	16,423	16,423	48,795	48,795	59,306	59,306	108,775	108,775	42,708	42,708	88,474	88,474	121,609	121,609	16,423	16,423	502,513	502,513	
Total area of existing built development	521	521	0	0	0	0	356	356	913	913	1,104	1,104	1,337	1,337	521	521	4,752	4,752	
Maximum area of proposed hard landscape	16,400	13,780	26,500	22,930	25,300	21,700	29,500	25,070	29,700	21,570	19,900	18,890	46,300	35,200	11,300	10,500	204,900	169,640	-35,260
Maximum area of proposed soft landscape	12,700	15,100	38,200	41,740	54,200	57,860	132,700	137,150	69,200	77,320	89,500	90,460	139,200	149,200	2,200	3,090	537,900	571,920	34,020
Maximum area of proposed built development	737	0	2,300	2,300	0	0	0	0	3,779	3,779	7,377	6,360	12,820	11,342	0	0	27,013	23,781	-3,232