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DATE: 13 March 2020

DEVELOPMENT CONTROL COMMITTEE

Meeting to be held on Wednesday 18 March 2020

Please see the attached reports marked “to follow” on the agenda.

- 7 PLANNING APPLICATION (19/04644/FULL1) - NATIONAL WESTMINSTER
SPORTS GROUND, COPERS COPE ROAD, BECKENHAM BR3 1NZ
(Pages 1 - 76)**

***Copies of the documents referred to above can be obtained from
<http://cde.bromley.gov.uk/>***

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Agenda Item 7

Committee Date	18 th March 2020	Agenda Item:
Address	National Westminster Bank Sports Ground Copers Cope Road Beckenham BR3 1NZ	
Application number	19/04644/FULL1	Officer Claire Brew
Ward	Copers Cope	
Proposal (Summary)	Erection of a covered full-size football pitch, creation of an artificial full-size pitch with floodlighting, and regrading of the site to create a full-size show pitch with spectator seating & six training pitches (two full-size, two 3/4 size & two half-size). External alterations and lobby & link extensions to the existing buildings. Installation of maintenance/store sheds, water tanks and under-pitch infrastructure. Associated highway and landscaping works.	
Applicant	Agent	
CPFC Ltd	Mr Luke Raistrick Centro Planning consultancy	
Reason for referral to committee	Major commercial development/departure from development plan	Councillor call in No

RECOMMENDATION	PERMISSION SUBJECT TO LEGAL AGREEMENT
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Summary

KEY DESIGNATIONS

- Metropolitan Open Land (MOL)
- Green Chain
- Adjacent to several areas of Local open space deficiency (to the north, east and south/south west)
- Adjacent Area of Special Residential Character
- Site of Importance for Nature Conservation (SINC)
- Air Quality Management Area
- Flood Zones 2 and 3

Land use Details			
	Use Class or Use description	Approx. area (GIA SQM)	% Site coverage based on site area of 106,196 SQM
(a) Existing buildings and surfaces	Goals 5-a-side pitches	7200	
	Pavilion, Gambados, gym and cottage	4210	
	Car parking and hardstanding	4649	
	Bowls club	Not known	
	Total	16,059	
(b) surfaces being removed	Goals 5-a-side pitches	7200	
(c) Proposed buildings and surfaces	Indoor pitch	9475	
	Outdoor artificial pitch	8255	
	Extensions to existing buildings	269	
	Maintenance building	220	
	Irrigation tanks & pumping station	280	
	hardstanding	Not known	
Total	18,499	17.4%	
Total built development in final scheme (a-b+c)		27,358	25.8% (70% increase)

Vehicle parking	Existing number of spaces	Total proposed including spaces retained	Difference in spaces (+ or -)
Standard car spaces	128	87	-41
Disabled car spaces	0	6	6
Cycle	0	34	34

Electric car charging points	20% active 80% passive
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Representation summary	<p>Neighbour letters were sent on 29/11/2019 and 10/02/2020. A site notice was posted from 2/12/2019 and a press ad was displayed in the News Shopper on the 11/12/2019. Consultation is for a minimum of 21 days.</p> <p>Over 200 letters of objection have been received. A significant number of objections which related to the loss of Gambado's Play Centre did not contain an address of the sender and therefore could not be logged, however, the contents of these comments have been summarised below.</p> <p>3 petitions containing a total of 442 signatures have been received from patrons of Gambado's Play Centre who are opposed to the loss of this facility.</p> <p>Approximately 549 letters of support have been received for the proposed development. However it is noted that a significant number are from people living outside of the local area or outside of the Bromley Borough.</p>
Total number of responses	599
Number in support	549
Number of objections	50

Section 106 Heads of Term	Amount	Agreed in Principle
Carbon off-setting payment in lieu	£23,040	Yes

1. SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The Site is occupied by existing sporting uses and leisure facilities and the enhancement and extension of the existing football academy and provision of enhanced sporting facilities is considered acceptable in principle land use terms;
- The proposed indoor covered pitch is inappropriate development in the MOL however there are demonstrable very special circumstances to outweigh the harm which would be caused to the MOL;
- The proposal would have an acceptable visual impact and would not significantly harm the character or appearance of the area;
- No significant harm would result to neighbouring occupiers;
- No significant highways impacts would arise; and
- No unduly harmful environmental impacts would arise.

2. LOCATION

- 2.1 The site is located on the north-western side of Copers Cope Road and comprises a private sports ground with a number of marked out pitches and a complex of three buildings;
- 2.2 The pavilion and adjacent modern building (in conjunction with the playing fields) have been used for private sporting purposes since their construction;
- 2.3 RBS Bowls Club continue to operate from part of the site (within the red line site boundary but not directly impacted by the proposals);
- 2.4 Goals 5-a-side Soccer Centre and Beckenham Gym formerly operated from two of the main buildings on the site and more recently these buildings have been used by CPFC Academy;
- 2.5 There are eight enclosed artificial football pitches, with flood-lighting, along the site's south east boundary, with Copers Cope Road, formerly operated by Goals.
- 2.6 The third building is currently occupied by Gambado's Play Centre and is in D1 use, as confirmed by the relevant lawful development certificate in 2015 (15/01407/ELUD);
- 2.7 The site also contains a number of sporadic smaller 'portacabin' style buildings/units and some areas of hardstanding adjacent to the south-western site boundary;

- 2.8 The rest of the site is generally open grassed playing fields, with some hardstanding for vehicular access and parking;
- 2.9 To the north-east the site is bounded by Worsley Bridge Road, beyond which is the Cegas sports ground;
- 2.10 Some individual trees are located along the north-east boundary with Worsley Bridge Road and the south-east boundary with Copers Cope Road. There are no trees with preservation orders on the site itself;
- 2.11 Opposite the site on copers Cope Road is further sports pitches and related development including Kent County Cricket Ground and CPFCS first team's training ground;
- 2.12 The site is bounded along its south-eastern and part of its south-western side by residential dwellings in Copers. Numbers 119 to 169 Copers Cope Road are all part of the Area of Special Residential Character (ASRC);
- 2.13 The north-western edge of the site is bounded by Pool River along with a belt of existing tree and shrub vegetation all designated as a Site of Importance for Nature Conservation (SINC);
- 2.14 Along the western edge of the site runs the railway line and a further belt of protected trees and shrubs which connect to a small area of protected woodland immediately adjoining the site (TPO Ref.269A: Land rear of 32 to 39 Century Way Beckenham);
- 2.15 The landform of the Site is relatively flat; however, it falls from the east to the Pool River to the west. Parts of the site are within Flood Zones 2 and 3;
- 2.16 The entire site is within Metropolitan Open Land (MOL) and the South East London Green Chain;
- 2.17 The site is publically accessed via a one-way system with the entry between No's 153 and 155 Copers Cope Road, and the exit between the 'Gambado' building and No.169 Copers Cope Road;
- 2.18 The site is in an area with PTAL rate of between 1b and 2 (on a scale of 0 – 6b, where 6b is the most accessible). Lower Sydneham Station which is located approximately 300m to the north of the site;
- 2.19 There is no public access through the site to adjoining sites.



Fig 1: Existing Site/location Plan



Fig 2: Existing aerial views of Site (Credit: Google Maps)

3. PROPOSAL

3.1 Works taking place on external parts of the site:

- 1 Full-size grass pitch with roof structure measuring 116m long x 81m wide x 19m maximum height to the apex of the curved roof (**9,475m² GIA**);
- 1 Full-size artificial 3G pitch with floodlighting (**8,255m² GIA**);
- 1 Full-size grass 'show' pitch with 2 x Spectator stands each providing 250 seats;
- 6 grass training pitches (2 full size, 2 three-quarter size and 2 half size);
- Footpaths to and between the pitches for visitors and spectators, medical buggy access and ambulance access to pitch areas;
- Engineering operations to include re-grading of site to provide level pitches and flood water storage;
- Grounds Maintenance Building (5.5m high to the ridge x 20m long x 12m wide) with pitched roof; 3 irrigation tanks (approx. 5m high from ground level) and pumping station (max height 2.2m) along south-western edge of site;
- The tanks and pumping station are marked as 'indicative' on the drawings and no elevations have been submitted for the pumping station, however the applicant has subsequently confirmed that the pump station would be 2.2m high maximum and the volume of the proposed tanks is sufficient for irrigation requirements and would not need to increase in the course of detailed design;
- A 2.8m (approx.) high screen is proposed to enclose the irrigation tanks and pumping station;

3.2 Extensions and alterations to existing buildings:

Pavilion:

- Removal of the front gable feature/pediment roof feature with the fine clock;
- Removal of terrace/viewing platform, stairs and balustrade;
- Removal of chimneys;
- Removal of all original fenestration;
- Re cladding or removing external historic brickwork in favour of timber cladding;
- Removal of all the front historic timber balustrading and veranda and replacement with front extension and glazed balustrade;

- Removal of the classically inspired Diocletian type arch windows below the balustrade;
- Reroofing using a metal material;

Cottage:

- Any changes to the cottage are unclear but looking at the drawings, the windows and conservatory appear to be altered.

Link building (between Pavilion and Gym):

- Double storey Extension to provide a new entrance, reception area and lobby and private viewing area;
- External refurbishments including glazed curtain wall and new signage;
- Level access provided into the building incorporating a new passenger lift;

Gym:

- Refurbishment of first floor to viewing deck for parents, coaches and video analysis opportunity;
- Ground floor front infill extension with glazed façade to provide a boot-up area and access out to the external pitches;
- Two storey link extension between the existing buildings and the proposed indoor pitch providing a boot-up area and pitch viewing area;

Gambado's:

- Provision of first floor mezzanine to provide classrooms, breakout area and circulation;
- Single storey extension for lobby.

3.3 Internally the following facilities would be provided:

- Classrooms/education centre
- Dining & kitchen area for visitors, staff and players;
- Physio/medical room;
- Physical education main hall;
- Physical education rooms;
- Changing rooms;
- Offices'
- Meeting rooms;
- Plant room.

3.4 Highways and parking proposals:

- Site access would be maintained with the access road linking Copers Cope Road to the car parking provision within the site;

- Eighty seven car parking spaces;
- Cycle parking;
- A coach parking drop-off bay is proposed immediately to the south of the refurbished Gambado building;
- Use of access track between No's 117 and 119 Copers Cope Rd for small grass cutting machinery, which will be transferred between the 1st Team's Site across the road, and for removing cut grass;

3.5 Hours of Use:

- Community use of the site will be 5 days a week in term time and 7 days a week in holiday time: 4pm to 10pm each day
- Academy Use: 8am to 10pm 7 days a week

3.6 Number of Users:

- Academy Players: 260
- Community users: approx. 50 (maximum 100)
- No. of Teams: 13
- Staff: 99 full-time
- Spectators: 150

centre (Use Class D1) to a use as a registered child care nursery, being from a use falling outside of the permitted uses that it can change from within Classes B1 (business), C1 (hotels), C2 (residential institutions), C2A (secure residential institutions) and D2 (assembly and leisure) of the Schedule to the Use Classes Order.

- 4.5 Following the refusal of prior approval, a Lawful Development Certificate for an existing use for use of premises as a children's indoor play centre (D1 Use) was submitted (ref.15/01407/ELUD). The existing use as an indoor children's play centre (Use Class D1) was found to be lawful in a decision notice dated 24/06/2015.

Pavilion Building and adjoining building:

- 4.6 Application Ref. 06/03776/FULL1: Single storey extension for swimming pool: Refused on 24/01/2007 for the following reason:

The site is located within the Metropolitan Open Land wherein there is a presumption against development not associated with agriculture, forestry or outdoor sport and the proposal would result in the undesirable intensification of an existing sporting facility and the Council sees no very special circumstance which might justify the grant of planning permission as exception to Policy G2 of the Unitary Development Plan.

- 4.7 Application Ref.07/01662/FULL1: External alterations to health and fitness club including the removal of high level windows and an existing door, removal of balcony (in part) and lean-to canopy and installation of new doors: Permitted on 22/06/2007
- 4.8 Application Ref.08/00147/FULL1: Disabled lift to side of cricket pavilion/retention of repositioned football pitches and revisions to existing car park area including additional overflow provision and retention of construction access: Permitted on 22/12/2008

'Goals' 5-a- side pitches:

- 4.9 Application Ref: 04/02725/FULL1: Artificial playing surface for 10 five-a-side football pitches, 5m high side netting and eighteen 8m high floodlights: Permitted on 27/10/2004
- 4.10 Application Ref. 08/00148/DET: Details regarding landscaping/bicycle parking/floodlights and community use agreement pursuant to conditions 2,4,6 and 10 of permission 04/02725 granted for 10 five-a-side football pitches/5m high netting and eighteen 8m high floodlights: Approved on 22.12.2008
- 4.11 Application Ref. 16/01312/FULL1: Temporary Stationing of 4No portacabins and a water tank. This was a retrospective planning application. At the time of writing the application is undetermined and the portacabins and water tank remain in situ.

External areas:

4.12 Application Ref. 15/04801/FULL1: Change of use from car park (located between the site boundary with Copers Cope Road and the 5-a-side football pitches) to construction of a hand car wash business including low level canopy and party-cabin to be used as customer waiting area and storage of equipment: Refused on 04/04/2016 on the following grounds:

- 1 The proposal would result in inappropriate development on Metropolitan Open Land which would result in a loss of openness, detrimental to the character and appearance of this area of Metropolitan Open Land, thereby contrary to Policy G2 of the Unitary Development Plan and Policy 7.17 of the London Plan.
- 2 The Acoustic Report does not use the proper methodology or assessment criteria of BS4142:2014 and is deficient in several respects and as such the proposed use of the site has a car wash would have a detrimental impact upon the living conditions of those living nearby, contrary to Policy BE1, London Plan Policy 5.3 & London Plan Policy 7.15 and the Mayors Ambient Noise Strategy.
- 3 The proposal as submitted would be detrimental to nearby residential amenity by reason of noise and disturbance and thereby contrary to Policy BE1 of the UDP.
- 4 In the absence of sufficient information to demonstrate the maximum potential of the operation and the impact on parking in the locality, the proposal would be likely to result in an increase in demand for on-street parking and traffic queues on Copers Cope Road, as well the visibility for vehicles exiting the site onto Copers Cope Road, detrimental to residential amenities and prejudicial to the safety and free flow of traffic, contrary to Policies BE1 and T18 of the UDP.
- 5 The application is not accompanied by a satisfactory Flood Risk Assessment or details of groundwater investigations demonstrating that the proposal will not result in an unacceptable risk of flooding or groundwater contamination contrary to Policy ER13 of the UDP and Policy 5.12 & 5.13 of the London Plan.

4.13 Application Ref.16/05845/FULL1: Resubmission of application 15/04801/FULL1 for Change of use from car park to hand car wash business: Refused and dismissed at Appeal;

4.14 The Inspector upheld the Council's view that the proposal was inappropriate development, which is by definition, harmful to MOL. In addition, he found that there would be harm through loss of openness, albeit limited, as well as harm to the living conditions of surrounding occupiers by way of noise. He found no very special circumstances to clearly outweigh the harm to the MOL.

5. CONSULTATION SUMMARY

A) Statutory

5.1 GLA (see Appendix 1) – **Objection:**

- The provision of new and improved outdoor sports and recreational facilities on this MOL site is supported, however, the indoor football pitch building is materially larger than the existing situation and would harm openness;
- It therefore fails to meet relevant exception tests of the NPPF and is inappropriate development, however, the applicant has demonstrated very special circumstances that justify the development, namely its public benefits which include an enhanced sports academy, community access and ensuring long-term and viable use of the site for outdoor sport;
- A detailed community use agreement for affordable and accessible usage of the sports facilities must be secured by S106;
- Inclusive access, climate change and transport concerns must be addressed.

5.2 TFL – **Objection:**

- Car parking at this site should be reduced to support strategic mode shift;
- Further clarification is needed in respect of trip generation;
- Cycle parking should be increased to accord with The Mayor's intend to publish London Plan standards;
- Further information is needed to demonstrate how the scheme would deliver the Mayor's Healthy Streets approach; and
- A Construction Logistics Plan, Delivery and Servicing Plan and travel plan must be secured by conditions.

5.3 Environment Agency –**Objection:**

- No objection to flood risk subject to a condition securing the ground raising and compensation storage is carried out as outlined;
- We acknowledge the proposed planting of non-native as well as native trees to help our ecosystem adapt with climate change (As supported by the forestry commission). We do however **maintain our objection** for reasons described below:
- Clarification is required as to the location of the proposed 48 trees to be planted in Biodiversity enhancement area 1: (additional info submitted on 11/03/20) – **acceptable**;
- Planting by a watercourse should be balanced in order to achieve areas of shade and light whilst still ensuring habitat connectivity. Therefore it has not been demonstrated if the proposed planting will have a potential detrimental impact upon the river environment: (additional info submitted on 11/03/20) – **acceptable**;

- We request confirmation of the proposed tree planting given that *Biodiversity enhancement area 1* partly falls within the designated area for flood compensatory storage and thus may conflict with the proposed function of the area which is to be design to be at a certain ground level and free from any structures including vegetation: (additional info submitted on 11/03/20) – **acceptable**;
- the recent submitted information does not provide any commentary on the current and potential biodiversity value of the river consider the proposed development may potentially impact on this environment and there is potential for the proposed development to have a detrimental impact on the aquatic ecology at this location (additional info submitted on 11/03/20) – **acceptable**;
- Enhancements to include naturalisation of the bank where the bank has been engineered deflectors, introduction of gravels, creation of low flow channel.

5.4 Sport England - **No Objection:**

- The remaining grass fields will retain their ability to support cricket and rugby;
- While the new Artificial Grass Pitch will lead to a less flexible use of the playing field, I am of the opinion that this has the potential to be mitigated by a satisfactory community use agreement, allowing it to be used by the wider community when it is not needed by the academy;
- A community use agreement condition is recommended.

5.5 Drainage (lead local flood authority) – **No Objection:**

- Development should be carried out in accordance with the submitted Flood Risk Assessment & Drainage Strategy Report

5.6 Thames Water – **No Objection:**

- Thames Waters response is based on gravity connections being utilised for the surface water drainage proposals. We would also encourage the storage and reuse of surface water runoff for irrigation o the sports facilities.

5.7 Historic England (Archaeology) – **No Objection:**

- the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.
- No further assessment or conditions are therefore necessary.

5.8 Natural England – **No comments – advised to refer to standing advice**

5.9 Network Rail – **No objection:**

- The developer must ensure that their proposal, both during construction and after completion of works on site, does not:

- Encroach onto Network Rail land
- Affect the safety, operation or integrity of the company's railway and its infrastructure
- Undermine its support zone
- Damage the company's infrastructure
- Place additional load on cuttings
- Adversely affect any railway land or structure
- Over-sail or encroach upon the air-space of any Network Rail land
- Cause to obstruct or interfere with any works or proposed works or Network Rail development both now and in the future
- Informatives are recommended

B) Local groups

5.9 North Copers Cope Road Residents Association:

- Welcome the presence of CPFC in Copers Cope Road as it will create a sustainable occupation of the MOL land and the MOL land on the other side of the road which is occupied by the first team
- Very concerned over size of indoor pitch building
- The Premier League does not require Category 1 clubs to have full size indoor pitches, it is a recommendation but not a requirement
- Other Category 1 clubs do not have full size pitches and are located in less intrusive locations and away from housing
- Indoor pitch is at the most visible part of the site right on its edge and very close to many local properties
- A smaller pitch could satisfy the planning rules in the context of the current site and would be similar height to existing buildings in the locality
- Presumption against building on MOL
- Harm to MOL
- Majority of the online support comments are not from local residents but fans of the club
- Insufficient detail regarding other new buildings: maintenance, water tanks and pumping station
- Inappropriate development in MOL
- No mention of a S106 relating to community use
- Noise has not been properly assessed and no screening or noise attenuation is proposed
- Road safety in issues in relation to use of maintenance track
- Significant reduction in car parking
- Existing water tank application is undetermined
- Impact of floodlighting on Kent County Cricket Ground, Pavilion House, Gallery House and Bank Cottage
- Hours of use of floodlighting needs to be conditioned
- Effect of proposed irrigation system of adjacent woodland
- Thames Water should be consulted and a license would be required
- Pitch location at bottom of gardens of 119 to 141 should be reassessed in the light of noise effects
- Visual intrusion from ball-stop nets over MOL

- Ecology/biodiversity should be enhanced
- The façade with the CPFC 'eagle' would be visually intrusive on Copers Cope Road and inappropriate in residential area – emblem should be refused
- Proposed buildings would quadruple the area of buildings on the site
- Harm to character of area
- Visual impact from Gallery House and Pavilion Buildings not assessed
- Sports Statement indicates there would be much greater use of the site
- Flood risk from grounds maintenance complex
- Tree felling will worsen flooding
- Loss of tennis courts
- Bowls club only offered a 5 year lease

5.10 London Playing Fields Foundation:

- Supportive of increased community use of the site
- positive impact on sport and recreation in LB Bromley and beyond
- will secure the future protection of the playing fields
- there should be no net loss of pitches and no reduction in the amount of pitches available for sport and recreation
- encouraged that the Palace for Life foundation will assume the responsibility for ensuring full and proper community use of the new facilities
- the Foundation has a successful track record of delivering highly effective interventions which benefit schools, disabled groups, the unemployed and disadvantaged communities.

C) Adjoining Occupiers

5.11 Due to the high level of letters received in respect of this development it has only been possible to summarise the main comments submitted in both support and objection. Full text is available on the Council's website.

5.12 Objections

5.12.1 Loss of Gambado's play centre (addressed in paragraph 7.1):

- Loss of community facility contrary to BLP policy 20
- Loss of important social function in the area
- Loss of well-used and popular venue
- Job losses (60+ people on a full and part-time basis)
- Loss of venue for charitable organisations including those providing support for families of children with complex medical needs
- Would like short-term lease extension until a new site can be found
- No marketing or consultation with alternative providers has been carried out
- Socio-economic statement is incorrect with regards to number of current employees

5.12.2 Principle/Impact on MOL (addressed in paragraph 7.2):

- Support the continued use of the MOL land for sporting activity subject to appropriate and sustainable development;
- The proposal is inappropriate development in terms of MOL
- Additional development into the MOL should not be permitted
- Comparable London football clubs have been able to satisfy their Academy ambitions but have built, or obtained permission to build, much smaller indoor pitch buildings than the building proposed by CPFC
- The Premier League's requirements for an indoor training pitch are identical for Category 1 and Category 2 Academies
- Premier Leagues' Youth Development rules state that the indoor pitch has to be available for exclusive Academy use at all times therefore question of how the proposed community use would work
- Substantial level of harm is not outweighed by any very special circumstances presented
- Permitting these buildings should not automatically allow future land owners of the site to re-develop larger buildings on the same footprint
- If CPFC were to quit the site then there should be a condition that the new buildings are taken down, any demolition material and debris is removed and that part of the site is returned to grass
- No details provided about nets and fencing and its impact on openness of MOL
- Should not set a precedent for more development in the MOL

5.12.3 Design/visual impact (addressed in paragraph 7.3):

- Visual impact
- Overdevelopment
- Out of context with existing residential character
- Building onto undeveloped parts of the site
- Full extent of show pitch, its fencing and spectator stands needs to be clarified
- The height, mass and floor area of the proposed indoor pitch building is excessive and there is insufficient justification for such a large building
- Siting of indoor pitch and 3G all weather pitch needs to be revisited
- Proposed grounds maintenance complex, the irrigation and floor attenuation scheme need to be clarified and detailed
- Urbanisation
- Limited details are provided regarding hard and soft landscaping
- Insufficient visual information provided in order to determine the impact, and effect, of the new structure including CGI views from the Pavilion and Gallery House flats and from appropriate parts of the Kent County Cricket ground
- Obtrusive colour choice of white and its reflective properties across Copers Cope road
- Location of the new pitch and high 'ball stop' nets behind and very close to 119 to 141 Copers Cope Road represents a visual intrusion in sight lines over the MOL land
- Might decide that they need even larger buildings
- Details of proposed spectator stands required

- Impact on ASRC
- Proposed building exceeds the requirements of the Premier League
- Like an aircraft hangar
- Unattractive industrial building
- Should be re-located to less intrusive part of the site
- Access Storage Facility in Bell Green is four storeys and 13 m and is very imposing seen from the road
- The proposed building by Crystal Palace at 19 m is 45% higher and its situation on the site very close to Copers Cope Road will increase the perception of its huge mass visually
- Building would dwarf nearby structures
- Pitch could be sunk/lowered to reduce height
- Plants will take time to mature and screen the structure

5.12.5 Impact on amenities (addressed in paragraph 7.6):

- Visual impact of ground maintenance buildings at rear of property
- Loss of tree and vegetation screening from boundary
- Disturbance from new service vehicle entrance road alongside property
- Noise disturbance from fixed plant and machinery contained within the maintenance buildings and pumping station and mobile plant operating out of the buildings - no noise assessment has been carried out for this area of the site
- Noise will increase as a result of the proposed increase in activity
- Construction noise needs to be considered
- Exact impact of floodlighting on neighbouring properties needs to be considered
- Noise from proposed pitches and goal mouth backing onto neighbouring gardens
- Security, disturbance and privacy
- Light pollution from translucent roof of indoor covered pitch

5.12.6 Heritage impacts (addressed in paragraph :

- The pavilion is older than suggested (1899) and original section looks almost identical today
- Plan to cover it is inappropriate

5.12.7 Traffic/highways impacts (addressed in paragraph 7.5):

- traffic generation and congestion
- Insufficient car parking/accessibility for coaches and deliveries
- Increase in on-street parking
- Insufficient cycle parking
- The future use of the site and the frequency and intensity of the use needs to be properly clarified
- Transport Assessment is flawed

- There are only three existing accesses, not four
- frequency of use of the access track between numbers 117 and 119 Copers Cope Road and the type and frequency of vehicles proposed to use it
- Application is for a training ground not a match venue

5.12.8 Flooding and drainage (addressed in paragraph 7.9):

- Site forms the Pool River's flood plain and re-levelling it would result in the area of land which forms the flood plain being raised so it would no longer be able to take flood water from the river which would have implications for flooding downstream
- Installation of 4 underground attenuation tanks with a total capacity of 6450 cubic metres would involve huge amounts of earth moving and engineering
- Requires the realignment of parts of the two Thames Water surface water sewers
- Lack of clarity over the proposed irrigation tanks and how they are related to the proposed attenuation system
- Necessary work consents with the EA and Thames Water are uncomplete
- There is no comments about Thames Water's view on the scheme

5.12.9 Trees and Ecology (addressed in paragraphs 7.7 and 7.8):

- Full Tree survey of site and an assessment of the impact on adjacent TPO trees is required;
- Impact of irrigation system on adjacent woodland
- Would like buffer planting behind houses in Copers Cope Road
- Loss of trees, scrub, grass and habitat

5.12.10 Other:

- Intention might be to vacate existing 1st team training ground once Academy is upgraded and the old training ground disposed of with a view to development (7.2.31)
- Renewed Bowls club lease may only be temporary – only 2 years from Jan 2022 (addressed in paragraph 7.2.40)
- Potential risks arising from the storage of large quantities of water so close to properties and railway line (Network Rail have not objected to the proposals)
- Energy conservation is not accounted for and energy statement is incomplete (addressed in paragraph 7.10)
- Existing water tank and temporary buildings should be conditioned for removal if the Council is minded to grant consent
- No S106 has been offered in respect of community use (addressed in paragraph 7.2.41)

5.13 Support

- Bowls club will be maintained which is a benefit to the local community
- Proposals will ensure that the entire site continues to provide sporting facilities with which it has always been associated

- further development of a local football club
- opportunities for aspiring young footballers in the area
- reduction in traffic conditions, as well as additional benefits to security
- redevelopment of buildings which are somewhat unsightly at present
- ensure the green space is protected from further development
- want to join the academy and play for CPFC
- great community focus
- benefit to young people

6. POLICIES AND GUIDANCE

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

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

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

The National Planning Policy Framework was published on 19th February 2019. The development plan for Bromley comprises the London Plan (March 2016) and the Bromley Local Plan (January 2019). The NPPF does not change the legal status of the development plan.

6.1 National Policy Framework 2019

6.2 NPPG

6.3 The London Plan

- 2.18 Green Infrastructure: the multi-functional network of green and open spaces
- 3.2 Improving Health and addressing health inequalities
- 4.12 Improving Opportunities for all
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.4 Retrofitting
- 5.5 Decentralised Energy networks
- 5.6 Decentralised energy in development proposals
- 5.7 Renewable energy
- 5.8 Innovative energy technologies
- 5.9 Overheating and cooling
- 5.10 Urban greening

- 5.11 Green Roofs and Development Site Environs
- 5.12 Flood risk assessment
- 5.13 Sustainable Drainage
- 5.14 Water quality and wastewater infrastructure
- 5.15 Water use and supplies
- 5.18 construction, excavation and demolition waste
- 5.21 Contaminated land
- 6.3 Assessing effects of development on transport capacity
- 6.8 Coaches
- 6.9 Cycling
- 6.10 Walking
- 6.12 Road network capacity
- 6.13 Parking
- 7.1 Lifetime neighbourhoods
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local character
- 7.5 Public Realm
- 7.7 Location and design of tall and large buildings
- 7.6 Architecture
- 7.8 Heritage assets and archaeology
- 7.13 Safety, security and resilience to emergency
- 7.14 Improving Air Quality
- 7.15 Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes
- 7.17 Metropolitan Open Land
- 7.19 Biodiversity and access to nature
- 7.21 Trees and woodlands
- 8.2 Planning obligations
- 8.3 Community infrastructure levy

6.4 Draft London Plan

- 6.5 The 'Intend to Publish' version of draft London Plan (December 2019) is a material consideration in the determination of this planning application.
- 6.6 The draft new London Plan was submitted to the Secretary of State (SoS) on 9 December 2019, following the Examination in Public which took place in 2019. This is the version of the London Plan which the Mayor intends to publish, having considered the report and recommendations of the panel of Inspectors. Where recommendations have not been accepted, the Mayor has set out a statement of reasons to explain why this is.
- 6.7 The London Assembly considered the draft new London Plan at a plenary meeting on 6 February 2020 and did not exercise their power to veto the plan.
- 6.8 Ahead of publication of the final plan, the SoS can direct the Mayor to make changes to the plan. This affects the weight given to the draft plan. At this

stage, the Council's up-to-date Local Plan is generally considered to have primacy over the draft London Plan in planning determinations. Where specific draft London Plan policies have been given particular weight in the determination of this application, this is discussed in this report.

6.9 Mayor Supplementary Guidance

- Accessible London: Achieving an Inclusive Environment (2014)
- Social Infrastructure (2015)
- The Control of dust and emissions during construction and demolition (2014)
- Character and Context (2014)
- Sustainable Design and Construction (2014)
- Community Infrastructure Levy (2013)

6.10 Bromley Local Plan 2019

- 5 Parking of Commercial Vehicles
- 20 Community Facilities
- 21 Opportunities for Community Facilities
- 26 Health and Wellbeing
- 30 Parking
- 31 Relieving Congestion
- 32 Road Safety
- 33 Access for All
- 34 Highway Infrastructure provision
- 37 General Design of Development
- 40 Other Non-Designated Heritage Assets
- 44 Areas of Special Residential Character
- 46 Ancient Monuments and Archaeology
- 47 Tall and Large Buildings
- 48 Skyline
- 50 Metropolitan Open Land
- 54 South East London Green Chain
- 57 Outdoor Recreation and Leisure
- 58 Outdoor Sport, Recreation and Play
- 69 Development and Nature Conservation sites
- 70 Wildlife Features
- 72 Protected species
- 73 Development and Trees
- 74 Conservation and Management of Trees and Woodlands
- 77 Landscape Quality and Character
- 78 Green Corridors
- 79 Biodiversity and Access to Nature
- 115 Reducing Flood Risk
- 116 Sustainable Urban Drainage Systems
- 117 Water and Wastewater Infrastructure Capacity
- 119 Noise Pollution
- 120 Air Quality

- 121 Ventilation and odour Control
- 122 Light Pollution
- 123 Sustainable Design and Construction
- 124 Carbon Dioxide Reduction, Decentralised Energy Networks and Renewable Energy
- 125 Delivery and Implementation of the Local plan

6.11 Bromley Supplementary Guidance

- General Design Principles
- Planning Obligations (2010)

7. Assessment

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

- Principle of Development:
 - Land use
 - Acceptability in relation to Metropolitan Open Land (MOL)
 - Very Special Circumstances
- Design and Visual Impact
- Heritage Impacts
- Transport
- Impact on neighbouring amenities
- Trees
- Ecology
- Flooding and Drainage
- Energy and Sustainability
- Air Quality

Principle of development including acceptability in relation to MOL

7.1 Land use

Acceptable

- 7.1.1 The existing buildings on the site are now mostly vacant, except for 'Gambado' which is occupied by a children's soft play centre. A certificate of lawfulness was granted in 2015 (ref.15/01407/ELUD) which established that the Gambado building had a lawful Class D1 (non-residential institutions) use under the provision of the Town and Country Planning (Use Classes) Order 1987 (as amended). The remainder of the buildings were last occupied by Beckenham Gym and changing facilities for 'Goals' 5-a-side football centre. Indoor and outdoor sport uses are both categorized under the Use Class Order as Class D2.
- 7.1.2 Under the Use Classes Order, a D1 use includes non-residential education and training centres. As such, the proposal to provide the

Academy's Education Centre within the Gambado building would not constitute a change of use according to the Use Classes Order. From the significant number of objections which have been received from residents in respect of the loss of the children's play centre, it is clear that Gambado is a highly valued and well-used community facility. Had the proposals involved an alternative use for this part of the site which *did* require planning permission, Bromley Local Plan policy 20 would have been relevant. This states that "*in respect of facilities identified by local communities as having significant value, planning permission for alternative uses will only be considered where it can be demonstrated that no prospective purchasers exist that would be willing to pay both a suitable price and maintain the existing use*". However, as discussed, the proposal to provide the Academy's Education Centre within the Gambado building does not constitute a change of use under the Use Classes Order.

- 7.1.3 Therefore, while the loss of this well-used and highly regarded facility is regrettable, the enhancement and extension of the existing buildings and the provision of outdoor and indoor pitches and associated facilities on an established sports site are all considered acceptable in principle land use terms, subject to an assessment of all other matters, including the acceptability of locating this form of development within Metropolitan Open Land (MOL).

7.2 Acceptability in relation to MOL

Acceptable

- 7.2.1 Metropolitan Open Land is strategic open land within the urban area. It plays an important role in London's green infrastructure – the network of green spaces, features and places around and within urban areas. **MOL protects and enhances the open environment** and improves Londoners' quality of life by providing localities which offer sporting and leisure use, heritage value, biodiversity, and health benefits through encouraging walking, running and other physical activity (Para 8.3.1, Intend to Publish London Plan).
- 7.2.2 London Plan Policy 7.17 affords Metropolitan Open Land (MOL) the strongest possible protection, whilst Policy G3 of the Mayor's intend to publish London Plan states that MOL should be protected from inappropriate development and proposals that harm MOL should be refused. Both policies state that national Green Belt policies, set out within the NPPF, apply to MOL and therefore MOL is offered the same protection as Green Belt. Bromley Local Plan (BLP) policy 50 is consistent with the London Plan.
- 7.2.3 As set out in paragraph 145 of the NPPF, the construction of new buildings should be regarded as inappropriate development in the Green Belt. Exceptions to this of relevance to the proposed redevelopment are:
- (b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness

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

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

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

(g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:

– not have a greater impact on the openness of the Green Belt than the existing development; or

– not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

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

a) mineral extraction;

b) engineering operations;

c) local transport infrastructure which can demonstrate a requirement for a Green Belt location;

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

e) material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and

f) development brought forward under a Community Right to Build Order or Neighbourhood Development Order.

7.2.5 On the Green Belt, the National Planning Policy Framework (NPPF) maintains its fundamental aim to prevent urban sprawl by keeping land permanently open ensuring that the essential characteristics of openness and their permanence are ensured.

7.2.6 Inappropriate development is, by definition, harmful to MOL and should not be approved except in 'very special circumstances'. When determining applications, LPAs should ensure that substantial weight is given to any harm to the MOL and 'very special circumstances' will not exist unless the potential harm to the MOL by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations (Para 144, NPPF). There is no definition for what could constitute 'very special circumstances' and each proposal will be considered on its own merits.

Appropriateness/Effect on Openness:



Fig.4: Site visit photograph with existing buildings on right

7.2.7 The NPPG at paragraph 001 (22.07.2019) provides examples of matters which may need to be taken into account in assessing the impact of a proposal on the openness of the Green Belt (and henceforth MOL). These include, but are not limited to:

- openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;
- the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and
- the degree of activity likely to be generated, such as traffic generation.

7.2.8 In the recent Supreme Court ruling ([*R on the Application of Samuel Smith Old Brewery \(Tadcaster\) & Ors v North Yorkshire County Council. Case Number: \(2020\) UKSC 3*](#)) (05.02.2020) the concept of openness was discussed in more detail. The Supreme Court found that, on a true reading of the NPPF, the visual quality of a landscape is not in itself an essential part of the openness for which the green belt is protected nor does it imply freedom from

all forms of development. Indeed, certain forms of built development are, in principle, appropriate in the Green Belt (and MOL) and compatible with the concept of openness:

Openness is the counterpart of urban sprawl...it is not necessarily a statement about the visual qualities of the land, though in some cases this may be an aspect of the planning judgement involved in applying this broad policy concept (Para 22).

7.2.9 Therefore, while openness is not directly linked to the visual qualities of the land, visual impact may, in some cases, be relevant to the question of whether openness will be preserved and the weight to be given to it is a matter of planning judgment.

7.2.10 The overall area of the Site which will be covered by built development in this scheme represents an increase of around 70% over that which exists. However, as set out below certain individual elements of the proposal are not inappropriate in accordance with paragraph 145 or 146 of the NPPF.

Extensions to existing buildings

7.2.11 The minor extension of the three existing buildings does not result in disproportionate additions over and above the size of the original buildings and would therefore be appropriate development in accordance with the NPPF exceptions tests outlined above (Para 145, criteria c).

New Ground Maintenance building, irrigation tanks and pumping station

7.2.12 There are 7 natural grass pitches which will require maintaining and watering throughout the year and the pumping station will enable water to be moved around the site at the correct pressure. While the applicant has confirmed that water in the tanks will be used on the two artificial pitches (one outdoor and one indoor) as well as the outdoor grass pitches, there is a justifiable need for such facilities in connection with the outdoor sporting use of the site.

7.2.13 While these buildings would be substantial in scale, by positioning them on the periphery of the site and partially on an area of previously developed land (existing hardstanding for tennis courts) the impact on openness will be minimised. The structures would also be partly screened from the western perspective by dense woodland as well as a proposed 2.8m high screen enclosing the buildings.

7.2.14 Therefore the provision of these facilities is considered to fall under exceptions (b and g) of the criteria in paragraph 145 and would therefore be appropriate development in accordance with the NPPF.

Engineering Operations

7.2.15 The proposed engineering operations are appropriate under paragraph 146 (criteria b).

Natural and artificial pitches

7.2.16 The provision of new and enhanced outdoor sports pitches, including the artificial 3G floodlit pitch, are all related to the existing outdoor sporting use of the site and are appropriate under paragraph 145 provided openness is preserved.

7.2.17 While the replacement of the existing natural grass pitch with a full size artificial pitch would result in a substantial increase in the amount of site coverage, openness does not imply freedom from all forms of development and, in this instance, the proposed pitch would have limited visual impact. This form of development is, in principle, appropriate development in MOL.

Covered pitch



Fig.5: Illustrative visual looking north-east from the Site (Design and Access Statement, Nov 2019)



Fig 6



Figs.6 and 7: Site visit photographs showing location of proposed covered pitch, existing Goals 5-a-side pitches/netting and existing unauthorised development

7.2.18 The proposed indoor covered pitch would be positioned on part of the site which until recently was occupied by 'Goals' and includes 10 x 5-a-side open-air pitches separated by hoarding type fencing of 1 – 2m in height, 5m high-sided netting around the periphery, and 18 x 8m high floodlight columns. It is acknowledged that the existing goals facility and its high sided netting, extending to around 110m along the Copers Cope Road frontage, already blurs views into the MOL somewhat. However, the proposed covered pitch would cover a much larger area (approximately 2275sqm larger) than the existing 5-a-side pitches and the roof itself would be significant in scale measure 116m long x 81m wide with a maximum height of 19m. It would be of a solid appearance, obstructing views across the MOL, particularly when seen from Copers Cope Road, but also from neighbouring sites and from the sports pitches at the site itself.

7.2.19 It is noted that the applicant has positioned the new building with the shorter edge facing onto Copers Cope Road in order to try and minimise its impact when viewed from this key point. However, the openness of the site will be significantly impacted, both visually and spatially, as a result of this development. It would also undermine one of the essential characteristics of MOL, which is permanence.

7.2.20 The proposed covered pitch would not all under any of the exceptions in Paragraph 145 or 146 of the NPPF. It is therefore concluded that it would constitute inappropriate development in the MOL.

Spectator seating

7.2.21 2 x 250 capacity stands are proposed on the north-west and south-east sides of the proposed show pitch. The seating would be partially sunk into the ground with an 'optional bund' to its rear. Alternatively, if no bund is constructed, a barrier extending to a height of 2m is proposed behind the seating area. The seating itself would extend to a depth of between 2.1 and 2.7m and 0.8m high as scaled from pitch level (including optional bund). The spectator stands would encroach into previously undeveloped parts of the site, impacting on openness. However, in either of the proposed options the stands would not be unduly high and the barrier (if used) would be similar in height to the existing hoarding type fencing currently in situ around the 'Goals' 5-a-side pitches. Provided appropriate materials are used and the stands are constructed in accordance with the details provided, they would have limited visual impact.

7.2.22 The Transport section of the report addresses the potential intensification of the use of the Site as a result of the proposals. It is concluded that the proposals would not result in a significant increase in traffic generation and the Spectator seating would therefore be considered appropriate under paragraph 145 (exception b).

Car parking and other hardstanding

7.2.23 Ancillary pathways around the pitches are all related to the existing outdoor sporting use of the site and are considered appropriate under paragraph 146 (criteria b) provided that openness is preserved. Visually, the paths would have negligible impact on openness and would support the use of the pitches making them accessible to all.

7.2.24 The number of parking spaces at the Site is being reduced by almost a third (from 128 to 87), however, the amount of hardstanding is increasing with the main car park (not the Gambado car park) being extended to the north-east in front of the Cottage. While this would encroach into a previously undeveloped part of the site it would have limited visual impact.

7.2.25 Provided appropriate materials are secured for all of the proposed hard surfaces, openness would be preserved and these elements would fall under the exceptions in paragraph 145 of the NPPF (criteria b). Details of all external materials and all boundary treatments and details of hard and soft landscaping are required by condition.

Very Special Circumstances

7.2.26 The applicant agrees that the proposed covered pitch is inappropriate development and has set out a case for very special circumstances (VSC) comprising the following factors, which are discussed in more detail below:

- The future prospects of CPFC within the Premier League and the need to develop a Category 1 Academy facility in order to continue the club's success;
- The facilities that a Category 1 Academy must provide as required by the Premier League and the specific "locational requirements" for such a facility;
- The benefits to the community from the CPFC's Palace for Life Foundation community programme;
- A long-term and viable business facility that will ensure that the site will be used for outdoor sports and recreation and well-maintained for the future.

7.2.27 The Elite Player Performance Plan (EPPP) is a Premier League –led strategy to improve the quality and quantity of home-grown players. The EPPP academy system awards clubs a category based on their achievement in different key areas, including training facilities, education and coaching. Crystal Palace FC already has Category 2 Academy status and wish to achieve Category 1 status in order to remain competitive in the Premier League in attracting the best players.

7.2.28 The Premier league's Youth Development Rules 2019/20 sets out the facilities which a Club's Academy will require in order to achieve Category 1 status. Rule 302 (Grass Pitches) requires

a) A sufficient number of grass pitches of the appropriate sizes (as required by the Rules relating to Games Programmes and with goals sized as required by the Rules relating to Games Programmes) to enable the Club to play all its matches in the Games Programmes and fulfil its commitments under these Rules as regards coaching.

b) One floodlit grass pitch enclosed with perimeter fencing and with designated areas for spectator attendance (save that if a Club is unable to obtain planning permission for floodlighting then the requirement for floodlighting shall be waived).

c) A designated area (on grass) for the coaching of goalkeepers.

7.2.29 Rule 308 requires the Academy to have access to “*One indoor Artificial surface pitch measuring a minimum of 60 yards by 40 yards (54.8 x 36.5m) which shall be owned by the Club and which shall be for the exclusive use of the Academy at all times*”. However, it recommends the use of an indoor pitch of official match size (105 x 68m).

7.2.30 The document also states, at Para 308, that:

Ideally a Club’s indoor facility should be located at its principal venue for the coaching of Academy Players and any new facility must be located at the principal venue. It is accepted, however, that a number of Clubs have existing indoor facilities which are located elsewhere, or that it may be impossible for a Club’s indoor facility to be located at its principal venue for planning reasons.

7.2.31 In terms of alternative sites being considered the applicant states that they have undertaken a search of alternative sites in LB Bromley and surrounding Borough’s and they conclude that there were no other sites available or large enough to accommodate all the pitches and other facilities necessary to achieve Category 1 status. No details of these enquiries have been provided. However, the Club is in existence and is long established in this MOL location, with the first team’s training ground also being located on the opposite side of Copers cope Road. It is understandable that the Club wish to upgrade its facilities in situ, commensurate with its future aspirations. Furthermore, there is nothing to indicate that the Club will no longer require their 1st team’s training ground should the proposed development proceed.

7.2.32 In terms of design and scale, the overall dimensions of the proposed indoor pitch building would exceed the dimensions of a full-size playing pitch, measuring approximately 116 x 80m. Consequently Local residents and amenity groups have questioned whether the size of pitch and the scale of the enclosure are really necessary, particularly as other Premier League Clubs do not appear to have such large facilities.

7.2.33 The applicant acknowledges that at the current time a full-sized covered pitch is not a pre-requisite for attaining Category 1 status. However, this rule is under constant review, with a high likelihood that it will become a pre-requisite in the near future. It is for this reason that Rule 308 (as above) presently

recommends a full-sized pitch (Para 3.3 Sports Statement). The FA is supportive of the application and “*strongly encourage*” the delivery of a full-size covered pitch.

7.2.34 It is also noted that additional space around the playing surface is necessary to facilitate the required run-offs (3m for training and 5m for matches), ball stop nets and rebound boards and that the proposed width of the enclosure and its ridge height has been determined by the need to accommodate a full-size pitch. According to the applicant, the height required for over the centre of a pitch is typically 15m+ and in this instance, the roof height and profile selected for the scheme is the lowest and smoothest available for the required frame span, as determined by the proposed use, and within the structural design limitations.

7.2.35 While the structure is unquestionably large there are locational benefits in positioning it on an area of the Site which included previously developed land as opposed to introducing new built development to the north-west, adjacent to Pool River and the SINC and onto previously undeveloped parts of the site.

7.2.36 There are also community benefits in providing a full-size pitch which, compared to a smaller alternative, would provide greater flexibility and capacity. The facility will be made available to the local community in partnership with the Palace for Life Foundation. They deliver programmes for more than 14,000 local children and young adults across south London. With increased access to the new Academy facility they can extend their reach in Bromley, especially for disability football, girls’ football, health and wellbeing programmes and employability workshops.

7.2.37 The FA/FF have consulted with the Palace for Life Foundation regarding this proposal and they have identified some of the specific benefits that the full-size indoor venue will include for their organisation:

- Disability programmes
- Girls participation
- Walking football
- Community engagement
- Schools tournaments

7.2.38 The applicant has stated that there is also potential for use by other community groups, beyond the community programmes run by the Foundation, which will be scoped separately.

7.2.39 The two full-sized 3G pitches and associated changing facilities will be available to the community outside of times that the academy requires them – namely afternoons and evenings. This would comply with rule 308, ensuring that the Academy has exclusive use of the facility at the times they require it and the Premier League have confirmed that they are supportive of this approach.

7.2.40 The Site has a long-history of sporting uses. The 1912 OS map of the area shows the site and the surrounding landscape as being given over to a series of Athletic Grounds and a Cricket Ground. The part of the site used by the bowls club would be completely unaffected by the application proposal and Crystal Palace FC and the bowls club are shortly to complete a 5-year lease for the bowls club to continue to use the relevant part of the site, beyond the current arrangement. The remaining grass fields will retain their ability to support cricket and rugby. Securing the long-term future of this Site, ensuring it is well maintained and kept available for the sporting and leisure uses for which MOL is intended, are also significant benefits of this scheme.



Fig.8: Extract from 1912 OS map (Credit: Statement of Significance, Barton Wilmore)

7.2.41 There would be no significant impact on playing fields. While the new Artificial Grass Pitch will lead to a less flexible use of the playing field, this has the potential to be mitigated by a satisfactory community use agreement, allowing it to be used by the wider community when it is not needed by the Academy. As such Sport England does not wish to object to the application, on the basis of a condition being imposed which requires the completion of a community use agreement prior to first occupation of the new facilities.

Conclusion on land use/principle

7.2.42 While it is clear that the proposal would constitute inappropriate development in the MOL and would harm openness; having regard to the merits of this particular application and taking into account the representations received from local residents and the above factors, in this instance it is considered

that there are adequate very special circumstances to outweigh the harm caused to the MOL. Accordingly, the principle of development is acceptable, subject to a final assessment including any other harm identified elsewhere in this report.

7.3 Design and Visual impact

Acceptable

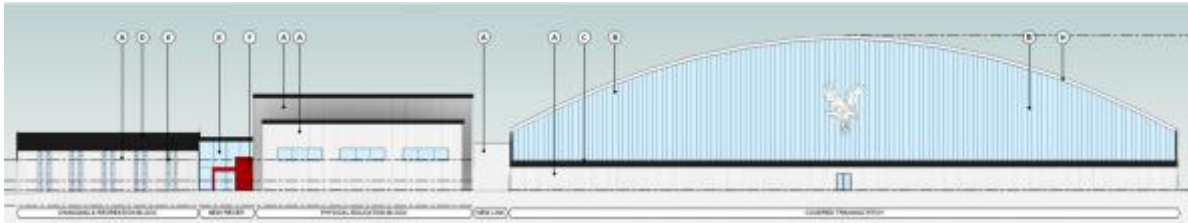


Fig.9: Proposed Copers Cope Road elevation

- 7.3.1 This area is characterised by a substantial areas of open space, all designated as MOL, occupied by various sports and recreational uses (and their associated buildings). The areas of open space are interspersed with low-density residential development along the main arterial routes of Copers Cope Road and Worsley Bridge Road and their adjoining streets.
- 7.3.2 The houses immediately adjoining the site to the south-east in Copers Cope Road all form part of the North Copers Cope Road (NCCR) ASRC. 119-169 Copers Cope Road whose rear (and flank) site boundaries adjoin the application site are three storey semi-detached brick Victorian housing built in the early 1900s. Narrow gaps between buildings are often occupied by garage facilities yet allow glimpses into the vegetation of back gardens.
- 7.3.3 In ASRCs redevelopment proposals should respect, enhance and where appropriate strengthen the characteristics which most contribute to these areas' special and distinctive qualities as identified in the Area Descriptions set out in Appendix 10.6 of the Bromley Local Plan. The proposals focus the most prominent parts of the development further to the north-east of the site and any views of the MOL currently obtainable between buildings in the ASRC from the street scene would not be unduly impacted.
- 7.3.4 One outdoor grass pitch is proposed to the rear of No's 127 to 139 copers Cope Road and it is likely that ball-stop netting will be required in this part of the site. There is an absence of detail in the application relating to this, however, it is considered that netting of a suitable colour and material, sympathetic to the visual amenities of the area and the amenities of the occupiers of neighbouring dwellings, could be secured by planning condition. Overall, the development would not undermine the important characteristics of the adjacent ASRC.
- 7.3.5 Due to the way this site has developed gradually over time, the existing group of buildings on the Site display a mixture of historic and more modern

architectural styles and there are also later additions to the historic Pavilion building. The buildings are inherently different, however, the design approach, which is for relatively small –scale extensions and façade alterations, would give a more coherent appearance to this group of buildings.

- 7.3.6 The resultant height of the physical Education (existing Gambado block) would be 11.6m stepping down to around 7.5m to the changing and recreation block (existing Pavilion). The refurbishment of the existing sports hall complex, including upgrading its façade to complement that of the indoor training facility, would also provide an enhancement to their appearance and promote uniformity across the buildings by using a selected materials palette. The proposed timber effect cladding, polycarbonate panels, feature metal panels and glazed curtain walling would result in a high quality finish for the development and are considered as an acceptable approach, in principle.
- 7.3.7 Given the prominence of the development and sensitive nature of the Site, conditions requiring details of all materials and details of any external plant proposed on the roof (or elsewhere) on the buildings are recommended.
- 7.3.8 Turning to the proposed indoor pitch, the height of the structure at its eaves would be approximately 8m (sitting below the roof height of the adjacent Physical Education block) rising to 19m at its central point (around 6.8m taller than the adjacent Physical Education block). The proposed structure would significantly exceed the general height of its surroundings and it is clear that it would have a significant visual impact. Proposals for large buildings are required, by policy, to make a positive contribution to the townscape, ensuring that the massing, scale and layout enhances the character of the surrounding area. Tall and large buildings will need to be of the highest architectural design quality and materials and be appropriate to their local location and historic context, including strategic views.



Fig 10: Existing views of Site from Copers Cope Road (existing Gambado building on left)
(Credit: Google Maps)



Fig.11: Illustrative from Copers Cope Road (Visual Impact Assessment, Feb 2020)

7.3.9 The most significant views of the proposed development, in particular that of the indoor training facility, would be from Copers Cope Road. The indoor training facility would introduce a greater extent of built form at a considerable height immediately adjacent to the existing sports hall complex/Gambado building. Existing boundary treatments in this area are low in height and open views across the MOL would be curtailed by the large structure. However, by facing its shorter edge onto Copers Cope Road and lowering the height of the building at its edges, the remainder of the Copers Cope Road frontage (approximately 100m) would remain 'open' (save for the presence of the existing boundary wall and tree screening). The mature trees along the Copers Cope Road Site frontage would also be retained and supplemented by additional tree planting which will provide a softer edge to the development when viewed from the street. Appropriate planting species and heights to help soften the visual appearance of the development can be secured by condition.

7.3.10 While the building is unquestionably high, due to the convex roof design, the main focus of the height is at its central point and, at eaves level, the structure would be significantly lower. This would help the structure to better assimilate with the adjoining buildings on the site and respond to the more 'open' part of the site to its north-east.

7.3.11 Local residents have raised concerns about the visual effect of the new indoor training facility from the Pavilion and Gallery House flats and from appropriate parts of the Kent County Cricket Ground site on the opposite side of Copers Cope Road. While there would undoubtedly be a change in view from the neighbouring sites, due to separation distances (around 100m to Gallery House and 129m to Pavilion House) and the lowered height of the building at its edges, the harm would not be significant.

7.3.12 Similarly, the structure would be highly visible from Bank Cottage and 134 Worsley Bridge Road. However, at a distance of around 110m, it would not result in significant harm to the amenities of the occupiers of those sites. Furthermore, in character terms, the proposed indoor covered pitch would not be an incongruous feature in the context of the sporting and recreational use of this site and the development would not cause significant harm to the adjacent ASRC.

7.3.13 Overall, while the scale of the proposed indoor covered pitch and prominent location on the site's frontage would undoubtedly have a significant visual impact and would represent a marked change in the landscape, as discussed in the preceding paragraphs, there are clear benefits to locating the indoor pitch in this location on parts of the site which contains previously developed land and away from the SINC and the adjacent ASRC.

7.3.14 Furthermore, the proposal would not have a discernible impact on the views of local importance of from Addington Hills or from Crystal Palace Park nor would it affect views to the Crystal Palace 'Major skyline ridge'.

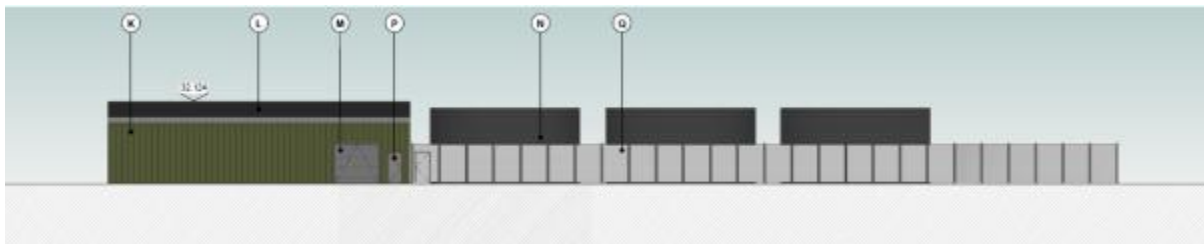


Fig.12: Proposed Grounds maintenance complex (south-west elevation)

7.3.15 The proposed grounds maintenance building, water tanks and pumping station would also be substantial in scale measuring as follows:

- Grounds Maintenance Building: 5.5m high to the ridge x 20m long x 12m wide with pitched roof;
- 3 irrigation tanks: approx. 5m high from ground level;
- Pumping station: max height 2.2m.

7.3.16 However, by facing the shorter edge of the buildings towards the neighbouring sites in the ASRC and, providing them within a 2.8m high enclosure, the visual impact on the wider area and from neighbouring buildings in the ASRC would not be significantly detrimental. Although the application does not include detailed elevations of the pumping station, the applicant has confirmed that it would measure 2.2m high would not be seen above the proposed enclosure fence. Elevations and plans for the detailed design of the pumping station are required by condition.

7.3.17 In accordance with policy 54 of the BLP Development proposals will be required to respect and not harm the character or function of the Green Chain or the Green Chain Walk. There would be no change to the level of connectivity that the retained open areas and green infrastructure within the Site have with adjacent land. The proposed development would not affect the function of the Green Chain. Measures to protect this designated area are to

include the use of suitable screening, landscaping or in appropriate areas the planting of native vegetation and enhancing of wildlife habitats. The applicant is proposing a number of habitat enhancements which are discussed in paragraph 7.8.

7.3.18 Policy D3 'Inclusive design' of the Mayor's intend to publish London Plan and Policy 7.2 of the London Plan seek to ensure that proposals achieve the highest standards of accessible and inclusive design (not just the minimum). The proposed redevelopment of the Academy will offer a fully inclusive access and sports programme. It is also noted that six disabled car parking bays will be provided within 30 metres of the building entrance, which is welcomed. However, all the proposed inclusive access measures must be secured through condition.

7.3.19 Overall, the design and layout of the development, its visual impact and the effect it will have on the character and appearance of this area, are considered acceptable.

7.3.20 Conditions are required to secure an appropriate colour and material for the enclosure and the applicant should explore providing additional planting in this area to help screen the buildings. In order to ensure that the finished buildings heights do not increase during the course of construction, conditions are recommended requiring details of existing and proposed site levels and finished floor levels for the proposed maintenance complex and the proposed outdoor covered pitch. Conditions will also require removal of unauthorised portacabins and water tank. Phasing requirements can ensure that the development and usage comes forward in an appropriate sequence consistent with the application. Tree and Landscaping conditions are recommended.

7.4 Heritage impacts **Acceptable**

7.4.1 The pavilion and the adjacent Cottage are shown on the 1912 ordnance Survey map (fig.8).



Fig.13: Photo the Pavilion on July 8 1899 (credit: *Played in London* by Simon Inglis)



Fig.14 Photos of Pavilion and cottage today



Fig 15: Photo of the Pavilion today

- 7.4.2 The application site is not in a conservation area and there are no 'designated heritage assets' which would be affected by the proposals. However, the Pavilion building, which is over 100 years old, is being altered substantially as part of this development. As part of the decision-making process, it is therefore relevant to consider whether the Pavilion (and to a lesser extent the Cottage) could be identified as a 'non-designated heritage asset'.
- 7.4.3 The applicant has submitted a Statement of Significance in relation to the Pavilion building. This concludes that it is of modest local heritage significance and, given the extent of alterations and extensions to the building, finds that it would be unlikely to meet the criteria for inclusion on the Bromley local list. While the Pavilion has been extended to the rear and to the north-east elevation with modern, flat-roofed extensions, the building itself has a typical Edwardian appearance with an interesting mixture of styles including some fine joinery, a fine pediment and classically inspired Diocletian type arch windows. It also retains an attractive symmetrical appearance. Officers are therefore of the opinion that the Pavilion and the cottage are both worthy of being considered 'non-designated assets'.
- 7.4.4 In accordance with paragraph 197 of the NPPF, 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.
- 7.4.5 It is acknowledged that the building has been extended substantially over the years, and its setting has also changed with much of the land to the south, east and northeast having been given over to car parking and hard landscaping. However, when viewed from the training pitches to the west, the pavilion typology remains discernible in the outward appearance of the building. In order to achieve a cohesive appearance across the built development at the Site, the applicant proposes to remove most of the original features of the Pavilion and re-clad its exterior. The proposed spectator seating and associated 2m high fencing also has the potential to harm the setting of the Pavilion when viewed from the west.
- 7.4.6 While most of the historically interesting features would be lost, the use of the building would continue largely as it was intended - for sporting uses and with the retention of a viewing terrace at the front.
- 7.4.7 Officers are therefore of the view that the level of harm using the NPPF definition is less than substantial overall.
- 7.4.8 When weighed against the public and other benefits of the development which include:
- recognition and retention of the Site's sporting heritage;
 - continued and extending community offering;
- on balance the proposal is considered acceptable.

7.4.9 The applicant has also carried out a geophysical survey of the Site and no further archaeological assessment or archaeology conditions are found to be necessary.

7.5 Transport **Acceptable**

Trip Generation/ Parking Demand

7.5.6 87 standard-size spaces and six disabled bays are proposed. It is noted that this is a net reduction of 35 spaces from the current provision.

7.5.7 A parking survey was undertaken to gain further understanding of the existing parking demand. The survey was undertaken with specific focusses on car park occupancy and the destination of parkers – with both the Gambados building and academy operational at the time of the survey. The gym closed in December 2018 and Goals in March 2019, so no parking demand for these uses was observed. The majority of existing parking at the Site is associated with the Gambado's use.

7.5.8 The Transport Assessment indicates a predicted fall in the traffic figures between the current use of the Site and the proposed use as an enlarged Academy only. The maximum parking accumulation for the Academy is forecast to be 72. With the removal of the Gambados use, the proposed reduction of car parking spaces at the Site is therefore seen as proportionate and appropriate.

7.5.9 On average, there would be approximately 50 community users of the facilities. However, this use would be only when there is no use by the Academy, so the demand is instead of, rather than as well as, Academy trips. The Palace for Life foundation will assume the responsibility for the majority of the community use of the Site. There is also potential for use by other community groups, beyond the community programmes run by the Foundation. Limited details have been provided of other groups at this stage, however, it is noted that the community function would never be running concurrently with the academy function and is therefore unlikely to impact significantly on the local highways network. A condition limiting the number of community users of the Site to 100 at any one time is recommended in order to ensure that future use of the Site does not expand which would increase traffic demand.

7.5.10 On match days, 500 spectators could, in theory, be accommodated on the site. However, it is anticipated that matches at this site will only be on rare occasions and, in the event that the Club did foresee a large demand for a fixture, the event could be relocated to another venue (such as to Selhurst Park). Accordingly the applicant is willing to accept a planning condition limiting events at the Site to no more than 150 spectators, which is acceptable in principle.

7.5.11 In the event that there is a specific occasion where higher numbers of spectators need to be accommodated on the Site, an Event Management Plan, which should be secured through condition, would need to be submitted to and approved by the Council (for each specific event). The Management Plan would need to include details on the measures that will be implemented to promote spectators to use sustainable and active travel to access this site.

7.5.12 In summary, while there would be some increase in vehicle trips along Copers Cope Road during match days; subject to a condition limiting spectator numbers, there would not be a significant impact on parking. When no matches are played; there is no potential conflict of parking.

7.5.13 A Travel Plan for the development should also be provided via condition.

7.5.14 Transport for London have questioned the proposed level of car parking, requiring justification for a provision it considered too high. The Site has a Public Transport Accessibility rating of between 1b and 2 and cannot be considered to enjoy a high level of public transport accessibility. On this basis the level of car parking proposed is considered acceptable.

Electric Vehicle Charging

7.5.15 At least twenty per cent of all car parking spaces provision should be provided with active Electric Vehicle Charging Points (EVCP), with passive provision for all remaining spaces. The applicant has confirmed they are willing to provide this. This should be secured through condition, and a Parking Design and Management Plan should also be secured which should provide detail on how passive provision can be activated should demand arise.

Coach Parking

7.5.16 The coach drop-off bay is proposed to be located immediately south of the refurbished Gambado building. A general arrangement layout and swept path analysis of this coach bay is provided which is satisfactory.

Cycle parking

7.5.17 28 long-stay and 6 short-stay cycle parking spaces are proposed. Whilst the quantum of long-stay cycle parking accords with minimum standards identified within the intend to publish London Plan, TfL have advised that short-stay cycle parking at this site should be increased to 100 spaces. The applicant contends that 100 short-stay spaces are a substantial over-provision for the site, given the context of the very low event-based demand at the site, and the proposed planning condition limiting spectators to 150. The provision of six short-stay cycle spaces is therefore considered acceptable. As the applicant has not shown where any of the cycle parking will be located at the Site, a cycle parking condition is required so that a suitable location and design for the cycle parking can be secured.

7.5.18 Overall, the parking and highways impacts of the development are considered acceptable, subject to conditions.

7.6 Neighbouring Amenity **Acceptable**

7.6.1 The most notable potential causes of nuisance for adjacent and nearby sites which this development has the potential to cause would be increased noise and disturbance; light spill/glare; harmful visual impact/outlook and increased traffic and congestion.

Noise and disturbance

7.6.2 *Noise from football training:*

The revised noise impact assessment includes an indication of potential worst case noise with more pitches in operation, albeit that it assumes one large and two small pitches used concurrently, the baseline assumption being that generally only one (large) pitch will be in use on any one day.

7.6.3 In terms of noise impact, the report concludes that noise impacts would be negligible with the exception of the receptor at Bank Cottage where the impact is predicted to be minor. This is compared to the average ambient noise levels based on historical 'average' Goals Soccer Centre (48dB at 160m away). The Environmental Health Officer has raised concerns over the actual levels of noise which will result, given the ambient background noise levels are only 38dB. However, given that the existing Site is in sporting use and the Goals Centre operated on the Site until relatively recently, it seems reasonable to use that as a comparison.

7.6.4 Residents in the vicinity would already be subject to noise associated with the existing use of the Site as a private sports facility with outside playing fields and, as previously discussed, the laying out of new outdoor grass pitches would not in itself require planning permission.

7.6.5 The Environmental Health Officer has also raised concerns regarding the potential noise impacts from proposed community use and the lack of noise monitoring carried out at weekends and public holidays. The community use would be for the covered and 3G pitches, which are distant from the majority of houses on Copers Cope Road, as well as those to the north-east of the Site at the former Maybrey Works and Footzie Social Cub sites. It is recognised that there would be a minor impact on occupiers of Bank Cottage and a condition restricting the hours of use of the facilities on Sundays and public holidays, in consultation with the applicant, is recommended.

7.6.6 The proposed condition to limit the number of people using these facilities at any one time and the securing of a Community Use Agreement by condition will also ensure that the intensity of the use of the Site does not escalate to levels which would harm residential amenity.

7.6.7 *Traffic Noise:*

As discussed above, the findings of the Transport Assessment are that there would be a reduction in vehicle trips associated with the Academy compared to the existing uses on the Site. As such there would be no adverse impacts from road traffic noise during the Academy operating times. Conditioning the number of Community users during the late afternoon/evening period will ensure that road traffic noise does not exceed acceptable levels during this time.

7.6.8 The access track between 117 & 119 Copers Cope Road is currently not used and has been left unkempt for a period of time. It is proposed to use this for small grass cutting machinery. This grass cutting machinery is normally stored at the 1st team ground across the road, and it currently drives up Copers Cope Road between the two sites. This use of this access would therefore be for occasional vehicles associated with cutting grass and removing cut grass and would not have a significant impact on adjacent residents. Furthermore, there are no significant concerns from a highways safety perspective.

7.6.9 *Plant noise:*

The plant to be used in the development is not known at this stage and no acoustic assessment has been carried out for this aspect of the scheme. Concerns raised by local residents with regard to the lack of information regarding noise from the maintenance buildings and pumping station are noted. However, these buildings would be sited around 20m from the rear of the nearest residential gardens and the plant and equipment would be contained within the buildings and screened by additional fencing around the periphery of the buildings which would help to minimise noise transmission. Notwithstanding this, a noise condition is recommended requiring an assessment of potential noise from all site plant and, where necessary, identification of acoustic mitigation measures.

7.6.10 Mechanical Ventilation and Heat Recovery Units (MVHR) are proposed on the roof of the existing buildings. The applicant has stated that extensive noise control measures will be installed to the MVHR units to ensure their operation does not cause a disturbance to the occupants. This is considered acceptable from a planning perspective. The MVHR design, materials and site work will also need to comply with the Building Control Technical Requirements. Meeting these requirements will ensure that the MVHR system does not become a source of any noise nuisance.

7.6.11 *Construction Noise:*

This will need to be assessed as part of a construction and environmental management plan which can be submitted post determination as part of a planning condition.

7.6.12 Overall, it is considered that the amenities of occupiers of adjacent and surrounding residential sites would not be significantly harmed by noise as a direct result of this development. Furthermore, the existing buildings which would provide the proposed D1 educational facilities are well-separated from

the adjacent railway line and would not be significantly impacted by noise or vibration from the railway.

Lighting Impacts

7.6.13 Floodlighting will be limited to the proposed artificial pitch in the north east corner of the site and within the proposed indoor covered pitch. The applicant has submitted a revised floodlighting scheme (reference 19041-10-SP-L-001Rev. 1, dated 25 February 2020) which focuses on the likely impacts on the two nearest sensitive receivers (Bank Cottage and 134 Worsley Bridge Road). The revised lighting scheme results in a reduction in the calculated vertical illuminance of approximately 55% compared to the original floodlighting proposal and would not have a significant impact on the amenities of the occupiers of the adjacent residential sites. It should, however, be noted that the report is based on pre-curfew lighting impacts only, and that the post-curfew lighting criteria are much lower. Should the floodlighting be used during post-curfew hours, it is highly likely that there will be a significant lighting impacting on local residential amenity.

7.6.14 The Environmental Health officer therefore recommends that the lighting curfew is no later than 23:00 hours or earlier than 07:00. A restrictive condition applying to all of the proposed floodlighting on the Site is recommended accordingly. This restriction, as well as careful consideration of materials, would also address residents' concerns regarding light pollution from the translucent roof of indoor covered pitch.

7.6.15 Furthermore, given the distance of the proposed floodlighting columns to the railway line to the south-west side of the site, the proposed lighting would not significantly impact on the adjacent railway infrastructure.

Visual impact/outlook/privacy

7.6.16 As discussed in paragraph 7.3, while the proposed indoor pitch would be highly visible from neighbouring properties in Worsley Bridge Road and on the Kent County Cricket Ground site, it would be viewed from distances of at least 100m away and would be seen in the context of existing and proposed trees along the site boundaries. The new indoor pitch would also be visible from the former Maybrey Works and Footzie Social Club sites where new residential development is being built or has been approved. However, it would be located around 140m away from these sites and would be partly screened by vegetation bordering the Site along Pool River.

7.6.17 The building would be closer in views from properties to the south-west of the site in the ASRC, however, views of the indoor covered pitch would be largely screened by the existing Gambado building which is in close proximity to the existing houses in Copers Cope Road and would continue to be the dominant feature when viewed from neighbouring gardens and the from the flank windows at No.169 which adjoins the existing vehicle egress from the Site (which runs alongside the Gambado building). Having regard to the separation distances together with the lowered height of the indoor pitch

building at its sides, the visual impact on neighbouring amenities would not be significantly harmful.

7.6.18 There are no extensions proposed to the existing buildings immediately adjacent to any neighbouring residential sites. The two storey extension to the reception area/first floor lobby would be sited approximately 50m from the rear boundaries of the adjoining houses in Copers Cope Road and as such would not give rise to any significant overlooking or loss of privacy for neighbours.

7.6.19 The provision of the mezzanine for the Academy at first floor level would not facilitate any views towards neighbouring residential sites and the proposed pitch viewing areas are either orientated towards the indoor pitch or the playing fields and would not give rise to significant overlooking to neighbouring sites.

7.6.20 With regard to the proposed ground maintenance building, water tanks and pumping station, it is recognised that these are substantial buildings and would be visible from the rear windows of the upper levels of the neighbouring dwellings in Copers Cope Road. However, given the separation distance from neighbouring sites, the proposed fence and the possibility of additional soft landscaping being planted in this area, these structures would not be significantly harmful to the amenities of neighbouring occupiers.

7.6.21 Concerns have also been raised from resident's whose properties will back onto the proposed outside pitch in the south western part of the Site, regarding security, disturbance and privacy. The Site has a long history of sports use, coinciding with the residential development in Copers Cope Road and already includes a number of playing pitches. The laying out of a new pitch would not in itself require planning permission as it would be consistent with the existing outdoor sport and recreational use of the Site (Class D2). While this particular part of the site is not currently being used and there would be increased activity in this area as a result of the development, given the long history of Sports Clubs operating from this Site, the impact on the privacy and amenity of neighbours would not be significant.

7.6.22 However, it is recognised that ball-stop netting would be required between the pitch and the rear boundaries of the properties adjoining this part of the Site, and that this needs to be visually acceptable from neighbouring dwellings. A condition to secure an appropriate enclosure is recommended accordingly. A Secured by Design condition is also recommended.

7.6.23 Furthermore, there would be no significant impacts on daylight or sunlight on neighbouring properties as a result of the development.

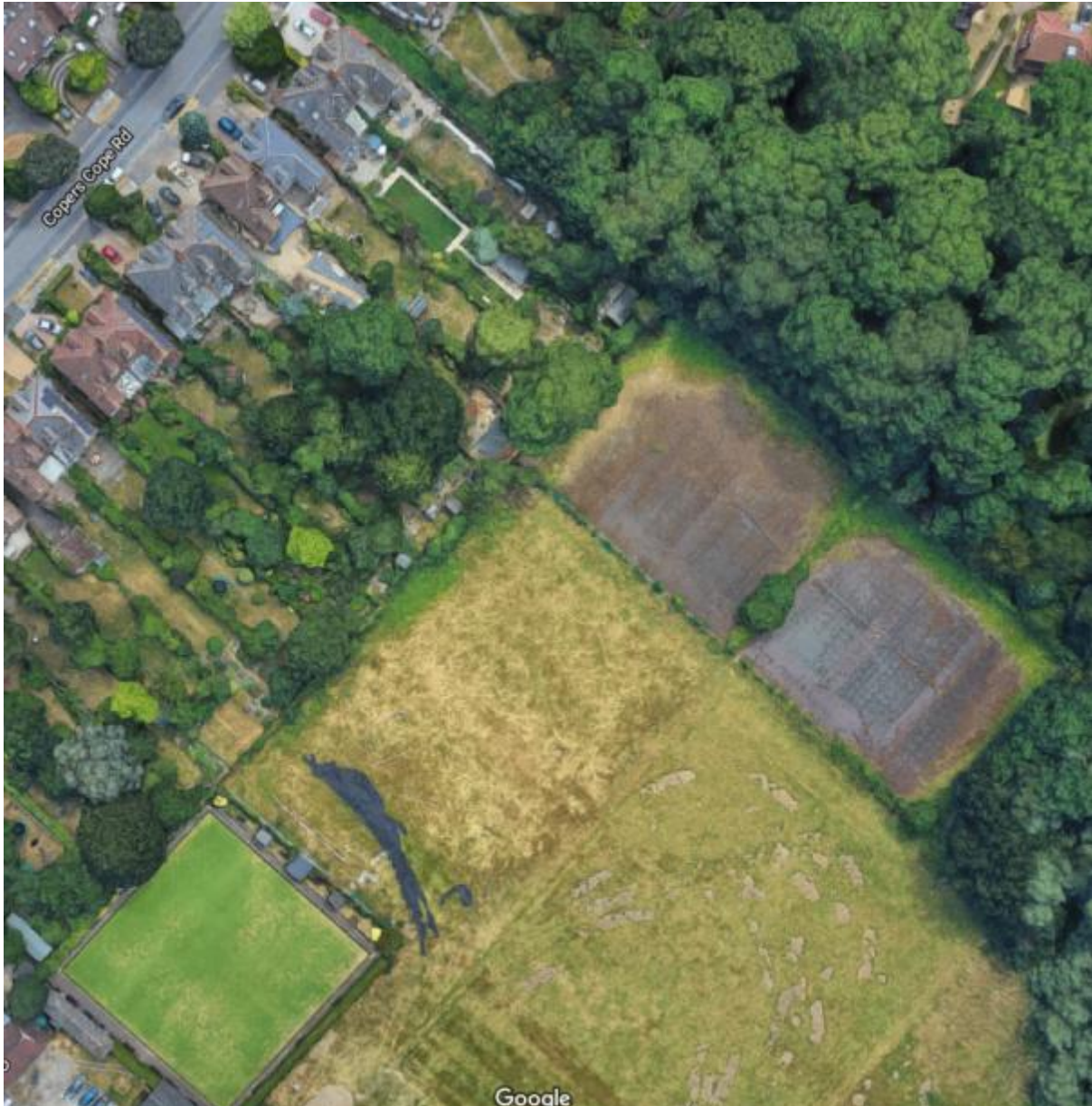


Fig. 16: Aerial view of existing site showing houses in the ASRC, existing disused tennis courts and proposed location of new grass pitch and grounds maintenance complex

7.7 Trees **Acceptable**

7.7.1 The application site is free from tree protective legislation. Tree cover is limited to the periphery of the site. There are 31 x trees (T1-T31) and 8 x groups (G1-G8) located within close proximity of the proposed development site

7.7.2 5 Category C trees and 3 category U trees as well as 2 groups of category C trees and 1 group of Category U trees will be removed as a result of the proposals. This includes 4 trees and 1 group lost as part of the works along the western boundary of the site (replacement of existing hardstanding with football pitch and proposed maintenance buildings and storage tanks).

7.7.3 Trees are valued as cohesive features as opposed to individual value. Trees proposed for removal are not awarded enough importance to support a recommendation for refusal. A number of other trees would be potentially impacted by the proposed development and one tree on the public highways of Copers Cope Road also has the potential to be impacted. Tree protection measures are recommended accordingly.

7.7.4 The application documents indicate that the significant belt of vegetation that follows Pool River along the north-west edge of the Site and the railway line along the western edge of the Site would be largely retained and enhanced. However, neighbours have raised concerns over the extent of tree works which have already been undertaken in these areas. It appears that this has extended beyond the requirements of the development and does not feature within the Arb consultant's recommendations. The felling of trees along the water course will not help with the Site's drainage issues and has been potentially harmful for biodiversity, however, it does not affect the current planning application. On a separate note, the applicant has been made aware works within 8m if the river may require a license to be obtained from the Environment Agency.

7.7.5 Landscaping and tree protection conditions are recommended.

7.8 Ecology **Acceptable**



Fig.17: Site Visit photograph with River Pool on the left of the photo



Fig.18: Disused tennis courts and woodland beyond

- 7.8.1 Planning policy requires that impacts on biodiversity are avoided or, if unavoidable, that impacts are adequately mitigated and compensated. The Intend to Publish London Plan policy G6 states that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process. The principal requirement of legislation based on the European Union Habitats Directive is that there should be 'no net loss' in the nature conservation status of protected species. This should be achieved through conditions imposed during planning and through other acts, and through the appropriate licensing and permitting regimes.
- 7.8.2 In addition to their Phase 1 Ecological Appraisal the applicant has submitted a biodiversity impact assessment and net gain report in response to the Environment Agency's (EAs) objection. A number of habitat enhancement measures are recommended including the planting of a total of 84 trees along the northern and eastern boundary areas which would result in an 11.4% biodiversity net gain on the Site. Existing woodland habitat and grassland is also to be improved. The proposed tree planting is a welcome by-product of the proposal and the proposed planting and other enhancements are acceptable, in principle. Further details of how the biodiversity net gain will be achieved are required as part of a condition.

- 7.8.3 Bromley Local Plan Policy 79 Biodiversity and Access to Nature refers to the requirement to conserve, protect and enhancing biodiversity at the local level to maintain, enhance and restore Site's of Importance for Nature Conservation (SINCs) and other biodiverse spaces. River Pool is adjacent to the site boundary and is a SINC. While the applicant has addressed the EAs concerns in respect of the enhancement and mitigation for the potential loss of biodiversity, limited details have been provided on the potential impact of the development on the Pool River and the EA upholds its objection.
- 7.8.4 In order to try and overcome the EAs objection the applicant has updated the Arboricultural Statement and now proposes to relocate Biodiversity Enhancement Area 1 to the northern corner of the site – the number and species of trees would not alter. Subject to relocating Biodiversity Enhancement Area 1 to the northern corner of the site, this would fall within the proposed floodplain. However, it would have a negligible effect in terms of flooding and would not lead to excessive overshadowing of the River Pool. Tree officer's comments on the updated proposals will be reported verbally at the meeting.
- 7.8.5 The applicant has also confirmed that the level of usage of added soil nutrients would be no greater than is used currently (bearing in mind that the club has operated from the site for 4 years already), and in any event it would be significantly below the level that would cause any risk of eutrophication of the river.
- 7.8.6 The applicant has also confirmed that in principle, they agree to provide in-channel enhancements, with the detail to be reserved by condition, with proposed measures to be discussed with and agreed by the EA.
- 7.8.7 In summary, subject to conditions including in-channel enhancements to the River Pool, the proposal would not have a significantly adverse impact on the adjacent SINC.
- 7.8.8 A Phase 1 habitat survey was undertaken in October which concluded that there was high potential for roosting bats in the Pavilion and moderate potential in the gym and Gambado buildings. No evidence of bat use of the buildings was discovered during the Phase 1 survey. However, no further survey work has been undertaken. The summary and Table 9 of the report recommends further bat surveys be undertaken including emergence surveys and this will be needed to inform the impact and detail of any mitigation needed to ensure no net-loss. The Pavilion will require three bat emergence surveys due to the extent of renovation work. As the buildings are to be retained, and they state that the works can be phased accordingly, it would be reasonable to impose a condition for further bat emergence surveys/mitigation.
- 7.8.9 The lighting area is sited away from the most ecologically sensitive parts of the site but has the potential to impact on commuting/foraging bats around the tree lines of the northern part of the site. A directional lighting system to prevent unwanted light spill into the environment can be conditioned in line

with the Appraisal's recommendations. During the planned works all construction areas should avoid light pollution and use directional lighting, preferably on motion sensor or timers at night to avoid negatively effecting foraging and commuting bats in the area.

7.8.10 Fourteen trees on site (but outside the proposed works area) had the potential for roosting bats. If the trees identified as having potential to support bats are to be felled or pruned significantly then further survey (climbing inspections) will be required to confirm the presence of absence of bats before arboricultural work takes place. A condition is recommended that no further tree felling is carried out without consent of the Local Authority.

7.8.11 The Preliminary Ecological Report also finds suitable habitat on site for reptiles, nesting birds and hedgehogs. Precautionary measures are recommended to protect these species during when the works are being carried out and to comply with the relevant legislation. A condition is required to ensure that the development is carried out in complete accordance with the recommendations in this report.

7.8.12 Overall, the proposals are considered acceptable from a biodiversity and ecology perspective. However, if the Environment Agency does not remove their objection and Members determine to approve the application, it will need to be referred to the Secretary of State.

7.9 Flooding and Drainage

Acceptable

7.9.1 The site is situated within flood zones 3, 2 and 1. Much of the buildings on site are located outside of the flood extents in flood zone 1. The main proposals located within the flood extents include the development of a full size football pitch along with six additional smaller ones.

7.9.2 The applicant has submitted a Flood Risk Assessment and Drainage Strategy.

7.9.3 In terms of potential flooding from the Pool River, the applicant is proposing flood compensation/storage measures which involve the re-grading of the site. The applicant has provided additional information addressing concerns raised over the viability of the proposed level for level compensatory scheme.

7.9.4 The approach to flood risk management for the proposed development complies with London Plan policy 5.12 (and draft New London Plan policy SI.12).

7.9.5 The Environment Agency has subsequently removed their objections in respect of flood risk, subject to a condition requiring the submission of details of a scheme of compensatory floodplain storage works.

7.9.6 In terms of surface water drainage, the drainage strategy claims that the proposed development will not increase the impervious area on the site.

However the proposed football pitch roof is likely to drain much quicker than the existing artificial pitches and the effective impervious area is therefore likely to increase.

- 7.9.7 The strategy proposes to attenuate runoff in below ground attenuation prior to discharge to a Thames Water surface water sewer, which then drains into the Pool River. The GLA have questioned whether rainwater harvesting from the indoor pitch roof (in addition to the attenuation system) could be carried out, in order to reduce water consumption. As it stands the proposals do not address the London Plan drainage hierarchy and the GLA are objecting to the application on that basis.
- 7.9.8 The applicant has subsequently provided a Technical Note which concludes that rainwater harvesting is not practical for this site due to the low levels of rainfall during the summer months and the practicalities in storing sufficient volumes to cater for the peak demand periods (June, July, August) of irrigation water demand. This, it states, would ultimately provide excess rainwater harvesting at a time of year where it is not required on the pitches and would require much larger storage capacity.
- 7.9.9 As an alternative approach, the applicant has suggested other measures to reduce the need for water, including drought-tolerant planting. The Lead Local Flood Authority (Drainage) Officer has confirmed that, as a substitute to rain water harvesting, planting is in line with the SUDS hierarchy in the London Plan. Subject to drainage and landscaping conditions, the proposal is acceptable from a flood risk and drainage perspective.

7.10 Energy and Sustainability

Acceptable

- 7.10.1 Current London Plan Policy 5.2 states that *“Development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:*
- 1 Be lean: use less energy*
 - 2 Be clean: supply energy efficiently*
 - 3 Be green: use renewable energy”*
- 7.10.2 Under the Current London Plan the proposal is required to achieve a minimum of 35% carbon reduction on site. The Draft New London Plan (policy SI2) requires Major development to be net zero-carbon. *“Within the framework of the energy hierarchy major development proposals should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation, where feasible”* (Policy 5.7(b)). Carbon off-setting payment in lieu would apply should there be any shortfall of regulated carbon emissions on site.
- 7.10.3 An energy assessment should be provided with applications for all Major development, demonstrating that climate change mitigation measures are integral to the scheme’s design and evolution, and that they are appropriate to the context of the development. The energy assessment should be prepared

in line with the GLA's guidance (Energy Planning – GLA guidance on preparing energy assessment – March 2016).

7.10.4 In response to comments received from the GLA and LB Bromley, the applicant has submitted an Energy Strategy Report (Greengage, 12th March 2020) which has considered the design of the refurbished parts of the building and will include features such as new efficient LED lighting, sensor technology to water fixtures to improve efficiency and upgrades to the external lighting systems. Opportunities for connections to a district heating system have also been reviewed but there are currently no existing heat networks or planned networks in the area.

7.10.5 The energy consumption and carbon emissions have also been calculated for the external food lighting and car park lighting, the irrigation pump, the extensions and new buildings and the lighting supplied to the new covered pitch. The design team for the proposed scheme have explored the feasibility of achieving a net-zero carbon target for the development, with the aim of achieving at least a 35% reduction on site and offsetting the remaining carbon via a carbon offset payment.

7.10.6 Several routes to net-zero carbon have been explored, including the provision of a photovoltaic array. Whilst a photovoltaic (PV) array is the most simplistic route to achieving a 35% reduction of on-site carbon dioxide, the applicant has committed to exploring alternative routes that will be explored at detailed design. For the purpose of this exercise, however, the route incorporating a PV array has been included and the applicant has demonstrated that these could easily be installed onto the roof of the existing Gambado building.

7.10.7 Conclusions of report:

- On-site regulated carbon dioxide emissions (Building Regs 2013 Compliant Development) = 19.8 tonnes CO₂ per annum;
- Proposed on site reduction of carbon emissions from energy demand/renewables = 7.0 tonnes CO₂ per annum
- On site shortfall = 12.8 tonnes CO₂ per annum

7.10.8 The applicant offers a financial contribution, in accordance with the adopted London Plan (March 2016), to offset the residual 12.8 tonnes of CO₂/year. This is calculated as £23,040 which will need to be secured as part of a S106 legal agreement. A condition is also recommended requiring the submission of an updated energy assessment, once the final designs have worked up in detail. This should include the exploration of additional on-site efficiency measures and renewables.

7.11 Air quality

Acceptable

7.11.1 The application site is within a designated Air Quality Management Area (AQMA). In accordance with the London plan, development proposals should minimise increased exposure to poor air quality. Where development is likely to be used by large numbers of people, particularly those vulnerable to poor

air quality such as children and older people, appropriate design solutions to prevent or minimise increased exposure to existing air pollution and steps to promote greater use of sustainable transport modes should be taken.

7.11.2 London plan policy 7.14 and policy SI1 of the Draft New London Plan state that development should be at least 'air quality neutral' and not lead to further deterioration in poor air quality (such as areas designated as AQMAs).

7.11.3 The applicant has submitted an Air Quality Assessment however data concerning emission rates and the expected yearly hours of operation of proposed plant has not been supplied at the time of writing, therefore the expected emissions of NO_x from the buildings are unknown. If the development building emissions are "air quality neutral" then no further mitigation would be required. Alternatively, if the building emissions are air quality negative then mitigation would be required.

7.11.4 It is noted that the building emissions will depend on the final design of the energy strategy and, as discussed above, the applicant is required to submit a final/updated energy strategy report as part of a planning condition. It will also be necessary for the building emissions to be calculated as part of an updated Air Quality Assessment, identifying, where necessary, suitable mitigation measures. The Air Quality Assessment should be secured by condition.

7.11.5 With regard to transport emissions, the applicant has submitted an Air Quality Neutral Assessment for transport which predicts a fall in traffic figures between the current/recent use of the site and the proposed use of the site. The annual average daily traffic from the proposed development has been calculated by the applicant to be 200 vehicle movements per day and is therefore anticipated to be air quality neutral.

7.11.6 The Council's Environmental Health Officer has raised concerns about the accuracy of this assumption and has questioned whether significant higher number of vehicle trips would in fact result from the development, as a whole.

7.11.7 As discussed in the preceding paragraphs at section 7.5, the community function would never be running concurrently with the academy function and conditions limiting the number of community users and the number of spectators attending events are recommended. A Travel Plan setting out what measures will be used to promote and encourage the use of alternative modes of transport to the car, specific to this development, will also need to be secured by condition and subsequently implemented.

7.11.8 Furthermore, the applicant has committed to provide 20% active and 80% passive electric vehicle charging points and on-site cycle parking and has agreed, in principle, to provide further mitigation in the event the development is found to be air quality negative (following finalisation of the energy strategy post-planning).

7.11.9 Whilst this approach is not ideal as it would be difficult for the Council to secure off-site air quality mitigation (as part of an S106) which has not been identified at application stage, there are a number of potential options for on-

site mitigation. On balance, the development is not likely to lead to a significant deterioration in already poor air quality in the area.

7.12 Other Issues

CIL:

7.12.1 The Mayor of London's CIL is a material consideration. CIL is payable on this application and the applicant has completed the relevant form. 26

Head of Terms:

7.12.2 A carbon off-setting payment £23,040 will need to be secured as part of a S106 legal agreement.

8. Conclusion

- 8.1 The enhancement and extension of the existing Academy including the provision of outdoor and indoor pitches and associated facilities on this established sports site are all considered acceptable in principle land use terms.
- 8.2 Whilst the proposed indoor covered pitch is unquestionably large, there are locational benefits for it to be located within Crystal Palace Football Club's proposed Academy Site and adjacent to its existing training grounds. Subject to appropriate materials, landscaping, limits to the hours of use and numbers of users (which can all be secured by condition), the proposal would not have a significantly harmful impact upon the character or appearance of the area or upon adjoining residential amenity.
- 8.3 Furthermore, the proposed development would not have a significant impact on local highways infrastructure. Measures to promote sustainable travel modes to the Site and any other mitigation measures, as deemed necessary, will all help to ensure that the development does not lead to a further deterioration of air quality.
- 8.4 While the objection from the Environment Agency in relation to the impact on the River Pool SINC is upheld at the time of writing, it is noted that conditions are considered as an acceptable way of mitigating against the potential impacts and there is also scope to enhance the biodiversity value of the Site.
- 8.5 On balance, the harm to the MOL and any other adverse impacts of the development which have been identified, are significantly and demonstrably outweighed by the very special circumstances including the wider social and community benefits of the development.
- 8.6 This application must be referred back to the Mayor of London before determination in accordance with the request of the GLA in its Stage One Response. Should the Environment Agency uphold their objection it will also

need to be referred to the Secretary of State, being major development in a flood risk area.

RECOMMENDATION: PERMISSION SUBJECT TO LEGAL AGREEMENT

SUMMARY OF CONDITIONS AND INFORMATIVES

Standard Conditions:

1. Time limit of 3 years
2. Drawing numbers

Pre-Commencement Conditions:

3. Construction and Environmental Management Plan
4. Land Contamination Assessment
5. Air Quality Neutral Assessment
6. Phasing Plan
7. Existing and proposed slab levels and finished floor levels
8. Scheme of compensatory floodplain storage works
9. Tree Protection Strategy
10. Landscaping to include details of the spectator seating
11. Biodiversity enhancement measures
12. River Pool: In-channel enhancement measures
13. Community use Agreement to include:
 - Use of the covered pitch, and 3G pitch (as well as the associated changing facilities)
 - To be managed by the club's charitable foundation – Palace for Life – and used by the foundation's participants
 - Hours of use

Above Ground Construction Conditions:

14. Bat emergence surveys
15. Site Wide Energy Assessment and Carbon reduction strategy: Final updated energy strategy including air quality mitigation, details of location and appearance, noise and odour mitigation and measures to control fumes and soot emissions from any equipment
16. Details of the scale and appearance of the pumping station
17. Details of external materials
18. Details of all boundary treatments, screening around the grounds maintenance complex and ball-stop nets
19. Cycle parking details
20. Refuse storage details
21. Details of the access layout
22. Secure by Design

Prior to occupation conditions:

23. Car park management scheme and provision of electric vehicle charging points
24. Travel Plan
25. Community Use Agreement
26. Service and Delivery Plan

Compliance conditions:

27. Restrictions on Hours of Use: Monday to Saturday: 8am to 10pm; Sundays and Bank Holidays: 8am to 9pm (TBC)
28. Restriction on Number of Users:
 - Academy Players: 260 max
 - Community users: 100 max
 - Staff: 99 max
 - Spectators: 150 max
29. Lighting to be provided in accordance with the finalised floodlighting design and light spillage assessment
30. Event management plan: limiting events to no more than 150 spectators unless otherwise agreed by the LPA
31. Development to be carried out in accordance with the recommendations in the Preliminary Ecological Appraisal and Preliminary Roost Assessment Report
32. Flood risk assessment and drainage strategy to be implemented in accordance with the approved details
33. No further tree felling
34. Restriction on hours of use of floodlighting
35. Restriction on use of access road between 117 and 119 Copers Cope Road for maintenance vehicles and grass cutting machinery
36. Non-Road Mobile Machinery

Any other conditions considered necessary by the Assistant Director (Planning)

Informatives:

Mayoral CIL
Flood Risk Activity Permit (Environment Agency)
Thames Water (various)
Network Rail (various)

GREATER LONDON AUTHORITY

Jake Hamilton
Head of Development
Management
Bromley Council
Civic Centre
Stockwell Close
Bromley BR1 3UH

Department: Planning
Our ref: GLA/5386/TT/02
Your ref: DC/19/04644/FULL1
Date: 20 January 2020

Dear Mr Hamilton

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

National Westminster Bank Sports Ground, Beckenham
Local planning authority reference: DC/19/04644/FULL1

I refer to the copy of the above planning application, which was received from you on 9 December 2019. On 20 January 2020, the Deputy Mayor for Planning, Regeneration and Skills under delegated authority considered a report on this proposal, ref: GLA/5386/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Deputy Mayor considers that the application does not comply with the London Plan and intend to publish London Plan, for the reasons set out in paragraph 48 of the above report.

If your Council subsequently resolves to grant permission on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged or direct the Council under Article 6 of the Order to refuse the application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution. If your Council resolves to refuse permission it need not consult the Mayor again (pursuant to Article 5(2) of the Order), and your Council may therefore proceed to determine the application without further reference to the GLA. However, you should still send a copy of the decision notice to the Mayor, pursuant to Article 5 (3) of the Order.

Please note that the Transport for London case officer for this application is Amy Tempest, e-mail: AmyTempest@tfl.gov.uk and telephone 020 3054 3649.

Yours sincerely

A handwritten signature in blue ink that reads "John Finlayson". The signature is stylized with a long horizontal line extending to the right.

John Finlayson
Head of Development Management

cc Gareth Bacon, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Lucinda Turner, TfL
Mr Luke Raistrick, Centro Planning Consultancy, The Clockhouse, Station
Approach, Marlow, SL7 1NT

National Westminster Bank Sports Ground, Beckenham

in the London Borough of Bromley

planning application no. DC/19/04644/FULL1

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Redevelopment of the site involving erection of a new indoor full-size football pitch, creation of an open air artificial full-size pitch with floodlighting and regrading of the site to create a full-size pitch with spectator seating & six training pitches. External alterations and extensions to the existing buildings, and associated highway and landscaping works.

The applicant

The applicant is **Crystal Palace Football Club Limited**, and the architect is **KSS Architects**.

Strategic issues summary

Metropolitan Open land: The provision of new and improved outdoor sports and recreational facilities on this MOL site is supported. However, the indoor football pitch building is materially larger than the existing situation and would harm openness. It therefore fails to meet relevant exception tests of the NPPF and is inappropriate development. However, the applicant has demonstrated very special circumstances that justify the development. The proposal by virtue of its public benefits which include an enhanced sports academy, community access and ensuring long-term and viable use of the site for outdoor sport would outweigh the harm the scheme would cause. In principle, the proposal accords with London Plan Policy 7.17, the Mayor's intend to publish London Plan Policy G3, and the NPPF (paragraphs 14 to 24).

Sports facilities and community use: A detailed community use agreement for affordable and accessible usage of the sports facilities must be secured by S106 (paragraphs 25 to 28).

Urban design, Inclusive access, climate change and transport concerns must be addressed (paragraphs 29 to 44).

Recommendation

That Bromley Council be advised that the application does not yet comply with the London Plan and The Mayor's intend to publish London Plan, for the reasons set out in paragraph 48 of this report; but that the possible remedies set out in that paragraph could address these deficiencies. The application does not need to be referred back to the Mayor if the Council resolves to refuse permission, but it must be referred back if the Council resolves to grant permission.

Context

1 On 9 December 2019, the Mayor of London received documents from Bromley Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 3D of the Schedule to the Order 2008: *“Development – (a) on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and (b) which would involve the construction of a building with a floor space of more than 1,000 square metres or a material change in the use of such building.”*

3 Once Bromley Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision, as to whether to direct refusal or allow the Council to determine it itself, unless otherwise advised. In this instance if the Council resolves to refuse permission it need not refer the application back to the Mayor.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The application site, which has an area of 11 hectares is located on Copers Cope Road and is entirely on Metropolitan Open Land (MOL). It currently contains a number of marked out outdoor sports pitches, buildings and car parking areas and there are no designated heritage assets on, or nearby the site.

6 The site was historically used as a private sports ground for employees of the Royal Bank of Scotland (RBS) but has been operated by other organisations over recent years. The RBS Bowls Club continue to operate from part of the site and 'Goals' and Beckenham Gym formerly operated from two of the three main buildings on the site, though more recently these buildings have been used by the existing CPFC Academy. The third main building is used for children's' soft play.

7 The opposite side of Copers Cope Road comprises further sports pitches, including Kent County Cricket Club (KCCC) and CPFC's first-team training ground and pavilion to the south. To the north, the site is bound by Worsley Bridge Road, beyond which is the CEGA's Sports Ground, and to the west and south-west the site is bound by the Pool River and railway lines, beyond which is the HSBC Group Sports Ground and Social Club.

8 The nearest section of Strategic Road Network is Beckenham Hill Road, located 875 metres to the east of the site. Only one bus route is located within 640 metres of the site, which can be accessed from Copers Cope Lane. Lower Sydenham station is located approximately 900 metres from the site, providing access to National Rail services to Hayes, London Cannon Street and London Charing Cross. Lower Sydenham

to Bromley Quietway can be accessed from Copers Cope Lane. Greenwich to Kent House Quietway can be accessed from Kangley Bridge Road. The site records a public transport accessibility level (PTAL) ranging between 0 and 1b, on a scale of 0-6b, where 6b is the highest.

Details of the proposal

9 The detailed planning application proposes the erection of a new covered/indoor full-size football pitch, a full-size open-air artificial pitch with floodlighting, regrading of the site to create a further full-size pitch with spectator seating and six training pitches (two full-size, two 3/4 size and two half-size). Additional works include external alterations and extensions to existing buildings, and the provision of maintenance and storage sheds, water tanks, under-pitch infrastructure and, associated highway and landscaping works.

Case history

10 There is no strategic planning case history relevant to this planning application.

Strategic planning issues and relevant policies and guidance

11 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2019 Bromley Local Plan, and the 2016 London Plan (consolidated with alterations since 2011).

12 The following are relevant material considerations:

- The National Planning Policy Framework 2019 and National Planning Practice Guidance.
- The Mayor's intend to publish London Plan (December 2019), which should be taken into account on the basis explained in paragraph 48 of the NPPF.

13 The relevant issues and corresponding policies are as follows:

- Metropolitan Open Land *London Plan; the Mayor's intend to publish London Plan;*
- Sports facilities *London Plan; the Mayor's intend to publish London Plan;*
- Community use *London Plan; the Mayor's intend to publish London Plan;*
- Urban design *London Plan; the Mayor's intend to publish London Plan;*
- Access *London Plan; the Mayor's intend to publish London Plan; Accessible London: achieving an inclusive environment SPG;*
- Climate change *London Plan; the Mayor's intend to publish London Plan; London Environment Strategy;*
- Transport *London Plan; the Mayor's intend to publish London Plan; the Mayor's Transport Strategy;*

Metropolitan Open Land

14 London Plan Policy 7.17 affords Metropolitan Open Land (MOL) the strongest possible protection, whilst Policy G3 of the Mayor's intend to publish London Plan states that MOL should be protected from inappropriate development and proposals that harm MOL should be refused. Both policies state that national Green Belt policies, set out within the NPPF, apply to MOL and therefore MOL is offered the same protection as Green Belt.

15 Paragraph 143 of the NPPF states that inappropriate development is, by definition, harmful to Green Belt and should not be approved except in 'very special circumstances'. According to paragraph 144 of the NPPF, when determining applications, LPAs should ensure that substantial weight is given to any harm to the Green Belt; 'very special circumstances' will not exist unless the potential harm to Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

16 As set out in paragraph 145 of the NPPF, the construction of new buildings should be regarded as inappropriate development in the Green Belt. Exceptions to this of relevance to the proposed redevelopment are:

- the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.
- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building.
- the replacement of a building provided the new building is in the same use and not materially larger than the one it replaces.

GLA officer's assessment on principle of land use

17 The provision of new and enhanced outdoor sports and recreation facilities and the minor proportionate extension of the three existing buildings would preserve openness and therefore be appropriate development in accordance with the NPPF exceptions tests outlined above (first and second bullet points).

18 However, the proposed new indoor full-size football pitch building due to its bulk and mass would have significant impact on the openness of the MOL, therefore does not meet any of the above NPPF exception tests, and is 'inappropriate' development within the MOL. As 'inappropriate development', the proposed building is harmful to MOL openness by definition. The applicant recognised this and put forward VSC case, which includes compelling need, community benefits and the long-term and viable use of the site for outdoor sport, which are assessed below.

Assessment on applicant's very special circumstances

19 The applicant contends that its proposals would result in significant social and economic benefits including community use of the new and enhanced training facilities and employment opportunities provided by the Academy. These would benefit the local area; the borough of Bromley and the whole of South London and therefore constitute

very special circumstances (VSC). This is accepted provided a suitable community use agreement is agreed and robustly secured in any planning permission as detailed below.

20 The applicant also contends that its proposals would ensure a long-term and viable use of the entire site for sport and recreational purposes going forward, a matter which Bromley Council afforded significant weight to in the VSC balance when granting planning permissions for Kent County Cricket Club on MOL site to expand its facilities (with enabling development), and for Bromley Football Club to redevelop the site within Green Belt for expanded and improved multi-purpose sports facilities. This is again accepted.

21 The applicant's final VSC argument is its need for a Category 1 Academy and points to the fact that Crystal Palace Football Club is currently South London's only Premier League team, and that the Club's existing Category 2 Academy has a very good reputation for producing Premier League footballers, including the current England National Football Team Manager, Gareth Southgate. In summary, the applicant contends that it needs a full-size indoor football pitch to meet the Football Association's Category 1 Academy requirements as well as the proposed suite of full-size open-air pitches (including an artificial turf 3G pitch with floodlights), and smaller pitches for its foundation and Early Youth teams. It also points out that other London Premier League clubs have similar facilities. This element of the applicant's VSC case is also accepted.

Impact on openness

22 The proposed new indoor sports building to accommodate CPFC's Category 1 Academy building measures 116 metres long and 81 metres wide, with a maximum height of 19 metres at the ridge and approximately 6 metres at the eaves, with a curved roof. The applicant team has carefully considered where the proposed building should be located on the site, and how its rectilinear form should be orientated so that the shorter edge would face onto Copers Cope Road in order to minimise impact on openness viewed from this key point. The remainder of the Copers Cope Road frontage (some 31 metres) will be opened up with a new 3G pitch allowing views to the MOL beyond. Furthermore, the approach of anchoring the new building partly at the previously developed part of the site that until most recently, was occupied by the former 'Goals', which included buildings that had a visual incursion on the site's openness, is supported.

Other harm associated with the inappropriate development on MOL

23 It is noted that the size and massing of the new indoor football pitch building would result in some encroachment into the dense scrub and semi-natural woodland (MOL). Whilst, as discussed above, there is support for the location and orientation of the new full size indoor football pitch building, it is essential that any other harm associated with encroachment into the MOL is minimised as far as possible. The applicant should also confirm whether it has explored other alternative sites for the scale and size of its proposal on brownfields that would not involve Green Belt or MOL.

Conclusion on principle of development

24 The provision of new and improved outdoor sports and recreational facilities on this MOL site is supported, and also the proposed proportionate extensions to the existing buildings would not harm openness. However, the new indoor football pitch

building is materially larger than the existing situation and would harm openness. It therefore fails to meet relevant exception tests of the NPPF and is inappropriate development. However, the applicant has demonstrated very special circumstances that justify the development this element of the proposal. The development by virtue of its public benefits which include an enhanced sports academy, community access and ensuring long-term and viable use of the site for outdoor sport would outweigh the harm the scheme would cause, and the applicant has demonstrated very special circumstances that justify the development. In principle, the proposal accords with London Plan Policy 7.17, the Mayor's intend to publish London Plan Policy G3, and the NPPF.

Sports facilities and community use

25 Policy S5 of the Mayor's intend to publish London Plan 'Sports and recreation facilities' and London Plan Policy 3.19 'Sports facilities' set out that those proposals that increase or enhance the provision of sports and recreation facilities will be supported; whereas those that result in a net loss of sports and recreation facilities, including playing fields should be resisted.

26 In satisfying Policy S5 of the Mayor's intend to publish London Plan and Policy 3.19 of the London Plan, the applicant has demonstrated that there would not be a loss of sports facilities, and the improvements to sports and recreation use is strongly supported.

27 The applicant's planning statement confirms that the club is committed to enhanced use of the indoor and 3G full-size pitches by CPFC's foundation community programme (Palace for Life, which delivers health, education and sporting programmes for more than 14,000 local children and young adults), outside of times that the academy would use them – namely afternoons and evenings. The applicant has stated that its aspiration is to assist people from all sectors of the diverse local community to access the facilities and to benefit from active sports engagement.

28 Whilst the applicant's aspiration and commitment as discussed above is welcomed, active engagement with relevant sports national governing bodies such as the National Football Association and Sport England; and local sports communities, is highly recommended. A detailed community use agreement for affordable and accessible usage of the sports facilities must be secured by the council. The details in terms of pricing, nature of coaching, and hours per week of accessible usage must be incorporated in the draft community use agreement and must be submitted prior to stage 2 referral to the Mayor.

Urban design

29 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within chapter seven which address both general design principles and specific design issues. London Plan Policy 7.1 and the Mayor's intend to publish London Plan Policy D1 set out a series of overarching design principles for development in London.

30 It is noted that the existing buildings will be retained (with some internal reconfiguration and refurbishment) in order to accommodate the requisite academy accommodation. Visually, the existing buildings are a collection of structures developed

on the site over a period of time and are not architecturally harmonised. Alongside these reconfiguration and refurbishment, a number of small extensions to the existing buildings are proposed in order to improve the functionality of the Football Academy, including a new entrance lobby, levelled viewing deck to the rear of the pavilion and viewing balcony into the covered pitch. These elements of the proposed redevelopment and the provision of additional open-air pitches of varying sizes and a 3G pitch, and the two 250-seater stands, will not have a significant impact on the openness of the MOL.



Illustrative visuals of the development: Source-applicant's Design and Access Statement, November 2019.

31 However, the design and access statement states that an essential part of Elite Player Performance Plan - EPPP Category 1 status is the requirement for an indoor pitch and that it is essential for the CPFC to have a full-sized covered football pitch in order to maximise practice and training programmes across age groups. Whilst the Club's aspiration is appreciated, the introduction of this element of the proposal with a maximum height of 19 metres at the ridge will have substantial impact on the openness of the MOL. However, given the careful consideration in regard to the location of the proposed building partly on the previously developed land and its orientation, so that the shorter edge would face onto Copers Cope Road, on balance, the design is acceptable.

Inclusive access

32 Policy D3 'Inclusive design' of the Mayor's intend to publish London Plan and Policy 7.2 of the London Plan seek to ensure that proposals achieve the highest standards of accessible and inclusive design (not just the minimum). The proposed redevelopment of the Academy will offer a fully inclusive access and sports programme. It is also noted that six disabled car parking bays will be provided within 30 metres of the building entrance, which is welcomed. However, all the proposed inclusive access measures must be secured through condition.

Fire safety

33 In accordance with Policy D12 'Fire safety' of the Mayor's intend to publish London Plan, all major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor.

This Statement was not submitted with the planning application at this stage and should be submitted before the case is referred back to the Mayor at Stage 2. The council should then secure its implementation through an appropriate condition.

Climate change

Energy

34 The only planning documentation provided for energy issues is a short note, which suggests that there is no heating and cooling element provided to the covered indoor football pitch and that lighting use will be occasional, and so the applicant does not envisage Part L of London Plan energy requirements will apply to the development. However, after reviewing the Design and Access Statement it is clear that the proposed development also includes the refurbishment and extension of existing buildings. The buildings are fundamentally linked to the other facilities proposed on site, and this and the floodlights will have a significant energy use and should be considered against the London Plan requirements as for a typical application. Stage 1 energy comments are separately sent out to the applicant and the Council. Key points include:

- An energy statement, which accords with energy policies of the London Plan and The Mayor's intend to publish London Plan must be submitted.
- Confirmation regarding the scope of Mechanical, Electrical and Plumbing (MEP) services provided to the covered indoor football pitch.
- Details on the extension of buildings and the potential for upgrade to newbuild standards.
- Overheating and potential for connection to district heating should be considered.
- PV should be maximised, and low carbon heating e.g. heat pumps should be considered.

Transport

Trip generation

35 A multi-modal trip generation assessment has been undertaken. However, further information is required to support its assumptions: for example, no modal split has been provided for the match days, therefore TfL is unable to agree with the applicant's conclusion that the events will have a moderate to minor impact on the public transport network.

Car parking

36 Eighty-seven general parking spaces are proposed, which is a reduction of forty-one spaces from current provision. However, no clear justification has been provided for the quantum proposed and TfL considers this can be further reduced, taking into consideration the proposed daily vehicular trips to the site. A further six disabled parking spaces are proposed. This is equivalent to seven per cent of total provision, which is welcomed. In line with the Mayor's intend to publish London Plan Policy T6.4, at least 20 per cent of car parking spaces should be provided with active Electric Vehicle Charging Points (EVCP), with passive provision for all remaining spaces.

Match days

37 On match days, 500 spectators can be accommodated on the site. It is anticipated that matches at this site will only be on rare occasions. Furthermore, the applicant states that it will agree a separate parking strategy with the council prior to any match taking place, which will include detail on the usage of off-site car parks. However, a more appropriate management tool for match days would be an Event Management Plan, which should be secured through condition. With the greater focus on active and sustainable travel, as highlighted within the Mayor's Transport Strategy and the Mayor's intend to publish London Plan, the Management Plan should include details on the measures that will be implemented to promote spectators to use sustainable and active travel to access this site.

Healthy streets

38 In line with London Plan Policy T2, it is expected that all developments will deliver improvements to support the Mayor's ten Healthy Street indicators. However, there is no detail on how the proposed development supports the delivery of the Mayor's Healthy Streets approach within the Transport Assessment (TA), and an Active Travel Zone assessment has not been undertaken. This work should be undertaken, and the applicant should set out proposed mitigation measures.

39 It is noted that an analysis of accident data has been undertaken, and potential improvements identified. A number of these improvements i.e. speed reduction measures, including a pedestrian crossing, will improve pedestrian and cyclist safety. To help support a strategic mode shift at this site, the council is encouraged to engage with the applicant to implement of number of the improvements identified. These improvements will need to be delivered through a S278 agreement with the appropriate highway authority.

Cycle parking

40 Cycle parking provision at this site should be increased to the Mayor's intend to publish London Plan standards. The applicant is strongly encouraged to exceed The Mayor's intend to publish London Plan standards at this development, taking into consideration its proximity to local cycle network. Further information is required which demonstrates how all cycle parking provided accords with London Cycle Design Standards (LCDS).

Freight

41 No outline delivery and servicing plan (DSP) has been provided to support the application, however information on this matter has been included within the TA. A full DSP for this development should be secured through condition, in line with the Mayor's intend to publish London Plan Policy T7.

42 Limited information on the construction of the proposed development is included within the framework construction logistics plan (CLP) has been included within the TA. In line with the Mayor's intend to publish London Plan Policy T7, a full CLP should be secured through condition. This should be prepared in line with TfL guidance. The full CLP should contain details on how the site will adhere to the Mayor's Vision Zero

principles and the measures that will be implemented to protect pedestrians and cyclists (with consideration given to the location of two Quietways in the vicinity of the site).

Travel plan

43 A draft travel plan has been provided. A full travel plan should be secured through condition. The targets contained within the travel plan should reflect the strategic mode shift target and contain measures that will be implemented to promote sustainable and active travel for each type of user at this site.

44 Summary of key issues:

- Car parking at this site should be reduced to support strategic mode shift;
- Further clarification is needed in respect of trip generation;
- Cycle parking should be increased to accord with The Mayor's intend to publish London Plan standards;
- Further information is needed to demonstrate how the scheme would deliver the Mayor's Healthy Streets approach, and
- A CLP, DSP and travel plan must be secured by conditions.

Local planning authority's position

45 Bromley Council's planning officers have confirmed that currently, they are assessing the proposal with a targeted planning committee meeting date towards the end of January 2020.

Legal considerations

46 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged or direct the Council under Article 6 of the Order to refuse the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

47 There are no financial considerations at this stage.

Conclusion

48 London Plan and the Mayor's intend to publish London Plan policies on Metropolitan Open Land, sports facilities and community use, urban design and inclusive access, climate change and transport are the key strategic issues relevant to this planning application. The application does not yet comply with the London Plan and the Mayor's intend to publish London Plan; the following changes might lead to the application becoming compliant:

- **Metropolitan Open land:** The provision of new and improved outdoor sports and recreational facilities on this MOL site is supported. However, the indoor football pitch building is materially larger than the existing situation and would harm openness. It therefore fails to meet relevant exception tests of the NPPF and is inappropriate development. However, the applicant has demonstrated very special circumstances that justify the development. The proposal by virtue of its public benefits which include an enhanced sports academy, community access and ensuring long-term and viable use of the site for outdoor sport would outweigh the harm the scheme would cause. In principle, the proposal accords with London Plan Policy 7.17, the Mayor's intend to publish London Plan Policy G3, and the NPPF.
- **Sports facilities and community use:** A detailed community use agreement for affordable and accessible usage of the sports facilities must be secured by the council.
- **Urban design and inclusive access:** The design is acceptable. Key materials, submission of fire safety statement and the approach to inclusive access must be secured.
- **Climate change:** An energy statement must be submitted. Confirmation regarding the scope of MEP services provided, details on the extension of buildings and the potential for upgrade to newbuild standards required. Overheating and potential for connection to district heating, maximizing PV, and low carbon heating e.g. heat pumps should be considered.
- **Transport:** Car parking must be reduced, further clarification is needed to support the trip generation provided, cycle parking should be increased and further information is needed to demonstrate how the site would deliver the Mayor's Healthy Streets approach. A CLP, DSP and travel plan must be secured by conditions.

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Mrs Claire Brew
London Borough of Bromley
Bromley Civic Centre Stockwell Close
Bromley
Kent
BR1 3UH

Our ref: SL/2019/119762/03-L01
Your ref: 19/04644/FULL1
Date: 10 March 2020

Dear Mrs Claire Brew

Erection of a covered full-size football pitch, creation of an artificial full-size pitch with floodlighting, and regrading of the site to create a full-size show pitch with spectator seating & six training pitches (two full-size, two 3/4 size & two half-size). External alterations and lobby & link extensions to the existing buildings. Installation of maintenance/store sheds, water tanks and under-pitch infrastructure. Associated highway and landscaping works.

**National Westminster Bank Sports Ground Copers Cope Road
Beckenham BR3 1NZ**

Environment Agency position

We thank the applicant for the additional information that support a net biodiversity gain for the site. We acknowledge the proposed planting of non-native as well as native trees to help our ecosystem adapt with climate change (As supported by the forestry commission). We do however **maintain our objection** for reasons described below:

Proposed location of tree planting

It would seem from the submitted proposals that it is proposed to plant more trees within existing woodland identified as *Biodiversity enhancement area 1* within Arboricultural Statement dated 3rd March 2020.

In the first instance we would request clarification as to the location of the proposed 48 trees to be planted in this area. We would strongly urge the applicant to address other areas within the curtilage of the proposed scheme to add greater connectivity, such as the northern corner. We would like to make the applicant aware that planting by a watercourse should be balanced in order to achieve areas of shade and light whilst still ensuring habitat connectivity. Therefore it has not been demonstrated if the proposed planting will have a potential detrimental impact upon the river environment.

In addition, we request confirmation of the proposed tree planting given that *Biodiversity enhancement area 1* partly falls within the designated area for flood compensatory storage and thus may conflict with the proposed function of the area which is to be design to be at a certain ground level and free from any structures including vegetation.

Assessment of the impact of the proposal on the River Pool

With reference to the submitted Arboricultural Statement, it has not addressed how parts of the Pool River could be enhanced to achieve biodiversity net gain and more importantly the current and proposed baseline value of the river at this location. Overall net gain should, where applicable, include enhancements to the aquatic ecology as well as to the terrestrial ecology.

Furthermore, there is potential for the proposed development to have a detrimental impact on the aquatic ecology at this location. As described above from the proposed planting of trees within close proximity to the river but also possibility of increased eutrophication from managing the training pitches with surface water run-off flowing directly into the river. The submitted Preliminary Ecological Appraisal (PEA) page 27 refers to the potential impact on the river:

'There are five non-statutory designated sites within 1 km of the site boundary, all of which are sites important for nature conservation (SINCs). The nearest is the river Pool, which is on the eastern boundary of the site. The development may impact this with the potential to change the nature of the river on site, by removal of trees and scrub, the possibility of increased eutrophication due to management practices, as there are additional sports pitches proposed, or by allowing light spill onto the river corridor.'

Given the presence of the 'River Pool at New Beckenham', a Site of Importance for Nature Conservation, we would request that the appropriate level of protection provided from this designated site and that is adequately assessed. Please note for example London Plan policy '**Policy 7.19 Biodiversity and access to nature**' refers to the protection of SINC's which goes on to state '*The indirect impacts of development (eg noise, shading, lighting etc) need to be considered alongside direct impacts (eg habitat loss). New development should improve existing or create new habitats or use design (green roofs, living walls) to enhance biodiversity and provide for its on-going management.*

Any potential loss of biodiversity from the propose development should consider not only the terrestrial but the aquatic environment. As mentioned above the recent submitted information does not provide any commentary on the current and potential biodiversity value of the river consider the proposed development may potentially impact on this environment as described in the submitted PEA by RSK. For example, within the summary of calculations, habitat group 'Rivers and lakes' has a zero existing baseline value, which especially given its designated site status would seem to be incorrect. Enhancements to include naturalisation of the bank where the bank has been engineered deflectors, introduction of gravels, creation of low flow channel.

Overcoming our objection

We first request confirmation of the location of the proposed 48 trees that are to be planted in 'Biodiversity enhancement area 1'. We would strongly urge to seek other areas within the curtilage of the proposed scheme to add greater connectivity, such as

the northern corner but also avoid a potential increase in shading by additional trees adjacent to the river in an already wooded area.

Secondly, depending on the findings of the appropriate assessment of the current and potential impact of the proposed on the river and aquatic ecology we would expect appropriate mitigation to follow that specifically address the specific loss of biodiversity/habitat of the river. As within previous response we have made some recommendations as to what can be achieved. Specifically, enhancements to include naturalisation of the bank where the bank has been engineered, deflectors, introduction of gravels, creation of low flow channel etc should be explored.

We would accept some of these measures and their design, if proposed, to be agreed through condition, such as any in-channel enhancements. However, we would request that at this stage the impact of the proposed development must be identified in the first instance, especially given the presence of the non-statutory designated site and the level of protection it requires as outlined within planning policy.

Yours sincerely,

Mr Ajit Gill
Planning Specialist

Direct e-mail Ajit.Gill@environment-agency.gov.uk

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