

GREATER LONDON AUTHORITY

Good Growth

Claire Brew

Principal Planner – Major Developments
Housing, Planning and Regeneration
London Borough of Bromley
Civic Centre, Stockwell Close
Bromley, BR1 3UH

Our ref: GLA/4436/01
Your ref: DC/20/00325/OUT
Date: 2 June 2020

Dear Claire

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

Crystal Palace Park, Thicket Road, Peng, London, SE20 8DT
Local Planning Authority reference: DC/20/00325/OUT

I refer to the copy of the above planning application, which was received from you on 28 February 2020. On 2 June, Jules Pipe CBE, Deputy Mayor for Planning, Regeneration and Skills, acting under delegated authority, considered a report on this proposal, reference GLA/4436/01. 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 115 of the above-mentioned report; however, the possible remedies set out in that report could address these deficiencies.

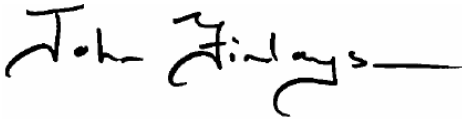
The application represents EIA development for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations. The environmental information made available to date has been taken into consideration in formulating these comments.

If your Council subsequently resolves to make a draft decision 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 to refuse the application; or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send the Mayor 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.

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

Yours sincerely

A handwritten signature in black ink that reads "John Finlayson" with a long horizontal flourish extending to the right.

John Finlayson
Head of Development Management

cc Gareth Bacon MP, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, MHCLG
Lucinda Turner, TfL
Jim Strike, AECOM
Lydia Lee, Bromley Council

Crystal Palace Park

in the London Borough of Bromley
planning application no. DC/20/00325/OUT

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

Erection of up to 210 residential units (0% affordable housing) to part fund a comprehensive phased regeneration of Crystal Palace Park, including the restoration of heritage assets, demolition and earthworks, landscape and access improvements, and the construction of new buildings in educational, cultural, community use and together with new play space, park maintenance facilities and alterations to existing car and coach parking arrangements.

The applicant

The applicant is **Bromley Council** and the agent is **AECOM**.

Strategic issues summary

Principle of development: The application proposes inappropriate development on Metropolitan Open Land (MOL) which would cause harm to openness. Very special circumstances have not been demonstrated which would clearly outweigh this harm. As such, the application is contrary to the NPPF and London Plan. Harm caused by the loss of the specialist caravan site facility could be outweighed by the range of public benefits proposed, as could the loss of parts of the park to residential use. Further discussion is required in relation to social infrastructure facilities (paragraphs 32 to 66).

Housing and affordable housing: No affordable housing is proposed on public sector land which is subject to a 50% threshold for affordable housing. Affordable housing is required and prior to Stage 2, the applicant must set out all available options to provide affordable housing, including through grant funding, different options in term of tenure mix and by providing affordable housing off-site or via a cash in lieu contribution. Early and late stage viability review mechanisms are required. Further discussion is required in relation to play space (paragraphs 67 to 74).

Heritage and urban design: Improvements to the park in relation to landscape, heritage, access and recreation are strongly supported. The significant heritage related public benefits associated with the restoration and repair of designated heritage assets on the Heritage at Risk Register could outweigh the less than substantial harm caused to the setting of the Grade II* listed park and Crystal Palace Conservation Area arising from the proposed development on the edges of the park (paragraphs 75 to 91).

Climate change: The energy, drainage and urban greening approaches are acceptable (paragraphs 92 to 95).

Transport: A further significant reduction in the quantum of public parking within the park is required, to reduce car journeys and promote active and sustainable travel. Parking management measures and charges are required and further information is required for temporary event car parking. A conditioned Events Management Plan should be secured by condition or S106 agreement. Further discussion is required to demonstrate that final parking levels would not impact bus operations. The potential implications of the application on the potential tram extension to Crystal Palace require further consideration (paragraphs 96 to 111).

Recommendation

That Bromley Council be advised that the application does not comply with the London Plan and the Mayor's Intend to Publish London Plan, for the reasons set out in paragraph 115; however, the possible remedies set out in this report could address these deficiencies.

Context

- 1 On 28 February 2020, 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 the Mayor's Intend to Publish 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 consideration in deciding what decision to make.
- 2 The application is referable under the following categories of the Schedule to the Order 2008:
 - *Category 1A.1: Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.*
 - *Category 3D: 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 floorspace of more than 1,000 square metres or a material change in the use of such a building.*
 - *Category 3F: Development for a use, other than residential use, which includes the provision of more than 200 car parking spaces in connection with that use.*
- 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; to take over the application for determination himself; or allow the Council to determine it itself.
- 4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.
- 5 The Mayor of London's statement on this case will be made available on the GLA website, www.london.gov.uk.

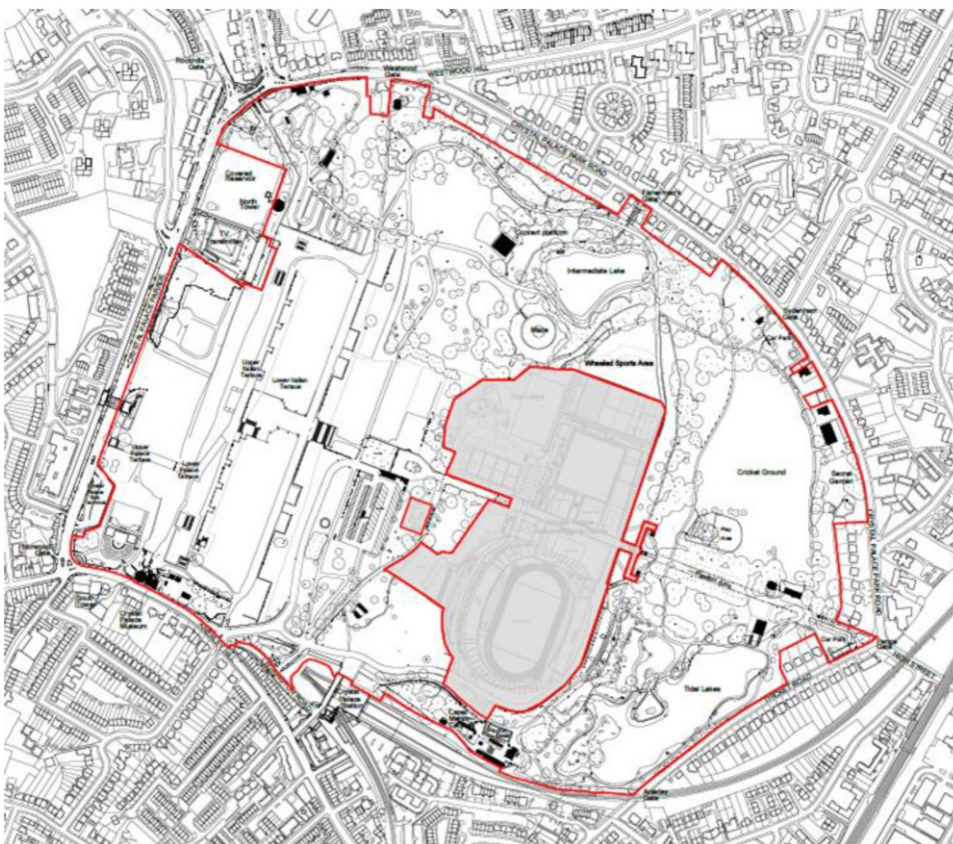
Site description

- 6 The application site is approximately 78 hectares in size and covers the majority of Crystal Palace Park which is predominantly designated as Metropolitan Open Land (MOL). The site boundary is shown below in Figure 1 and excludes the National Sports Centre complex, the site of the Crystal Palace Television Transmitter and the covered reservoir. The site is bounded by Crystal Palace Parade (A212) to the west; Anerley Hill (A214) and Crystal Palace Station to the south; Thicket Road to the south-east; Crystal Palace Park Road (A234) to the north and east; and Westwood Hill (A212) to the north. Crystal Palace Park falls entirely within the administrative area of the London Borough of Bromley and is located close to the boundaries of four other London Boroughs - Lewisham, Southwark, Lambeth and Croydon.
- 7 The park is one of the largest in south-east London and serves a regional function due to its size, location and the range of sporting, recreational and educational facilities and the historic and tourist attractions it contains. The area of the park covered by the planning application comprises areas of open undulating grassland, playing fields, woodland and informal shrub and tree planting

areas, two large lakes, a children's playground, information centre, cafe, maze, concert platform, a rose garden, skate park, the upper and lower Palace Terraces and Italian Terraces, Crystal Palace Museum and Capel Manor College and urban farm, as well as a number of car parks and vehicle access roads. The Lower Tidal Lake contain the famous pre-historic animal/dinosaur sculptures and are also used for boating. An intermediate lake is located further north on higher ground which is used for fishing. Crystal Palace Caravan and Motorhome Club occupy a site to the north-west of the main park which is accessed via Old Cople Lane. This site is in private use and currently has no public access.

8 Although not included within the application site boundary, the National Sports Centre forms a continuous part of Crystal Palace Park and includes an athletics stadium, 50-metre swimming pool, weightlifting gym, tennis courts, indoor and outdoor artificial grass pitches and squash courts, as well as car parking and pedestrian and vehicle access routes, including an elevated concrete walkway, together with a 12-storey Lodge Tower and a collection of two-storey houses, which were originally designed as accommodation for athletes.

Figure 1 – application site boundary



9 The vast majority (99%) of the application site is designated as Metropolitan Open Land (MOL) as set out in Bromley Council's Local Plan Proposals Map (2019). However, the application site boundary also includes a park maintenance facility on Crystal Palace Park Road, an adjacent St John's Ambulance facility, the *Diddy Dinos Nursery* and a two-storey park rangers' lodge at Sydenham Gate, which all fall outside of the designated MOL. The park also falls within the South East London Green Chain and includes strategic green chain and capital ring walks. The majority of the planning application site which falls within the designated MOL is also designated as a Site of Importance for Nature Conservation (SINC), though this designation excludes the caravan site, Palace Terrace, upper terrace and central car park. In terms of topography, the park rises steeply towards the ridge at Crystal Palace Parade (109 metres AOD) and falls in gradient towards Penge Gate (52 metres AOD) to the south-west.

10 The entirety of Crystal Palace Park is identified as a Strategic Outer London Development Centre in Bromley's Local Plan reflecting its sub-regional importance for leisure, tourism, arts, culture and sport. Upper Norwood Town Centre is located to the west.

11 The site is subject to a number of heritage designations. Crystal Palace Park itself is a Grade II* listed registered park and garden and the majority of the park falls within the Crystal Palace Conservation Area (though the conservation area excludes the Palace Terrace, TV mast and reservoir), but includes the Grade I listed prehistoric animal sculptures (dinosaurs), the Grade II* listed pedestrian subway, which lies under Crystal Palace Parade, the Grade II listed upper and lower Italian Terraces, the Grade II listed bust of Sir Joseph Paxton, the Grade II listed Gate Pier to the Rockhills, the Grade II listed Royal Navy Volunteer War Memorial, the Grade II listed gorilla statue.

12 The following designated heritage assets within the site are currently on the Heritage at Risk Register which is maintained by Historic England to identify heritage assets which are at risk as a result of damage, neglect, decay or inappropriate development:

- the Grade II* Crystal Palace Park as a whole;
- the Grade I listed dinosaurs;
- the Grade II* Crystal Palace Pedestrian Subway;
- the Grade II listed Upper and Lower Terrace; and
- Grade II listed north and south railings, walls and boundary marker at Crystal Palace Park Parade.

13 There are also a number of designated heritage assets adjacent to the site, including the Grade II* listed 1960s National Sports Centre building and Crystal Palace Station, 14 Anerley Hill and 108 Westwood Hill which are all Grade II listed. The wider area includes the Belvedere Road Conservation Area, Penge High Street Conservation Area, the Westow Hill Conservation Area and the Upper Norwood Conservation Area. The view from the Upper Italian Terrace is a view of Local Importance in the Bromley Local Plan and there are a number of important historic views within the park.

14 Public transport accessibility levels (PTALs) vary widely across the park due to its size, ranging from PTAL 0 within the centre of the park, to PTAL 6a close to Crystal Palace Station, Penge West Station and adjacent to Crystal Palace bus station. Crystal Palace and Penge West stations are on different branches of the London Overground East London Line (ELL) and National Rail Southern Railway networks. Crystal Palace bus station provides access to 11 routes and there are 23 other bus stops on the main roads which run parallel to the perimeter of the site.

15 A Housing Infrastructure Funding (HIF) award for the East London Line (ELL), amongst other elements, would deliver two extra trains per hour at Crystal Palace, resulting in a peak frequency of 6 trains per hour. Subject to the grant agreement, these could operate from 2024 and would improve public transport for those parts of the site within walking distance of the station. The A212, which forms the site's western boundary, is part of the Strategic Road Network. There are no nearby sections of the Transport for London Road Network.

16 In terms of land ownership, Bromley Council is the freehold owner of the entire park, with various sections of the park leased to other bodies, including the National Sports Centre which is leased to the GLA. The caravan park, Capel Manor college/urban farm, the museum, ambulance facility, fishing lake, TV mast site and reservoir are all subject to separate leases with various bodies.

Background and history

17 The park was originally designed by Sir Joseph Paxton and was formally opened by Queen Victoria in 1854. Paxton was also the designer of the original Crystal Palace which was constructed temporarily in Hyde Park as part of the Great Exhibition and then relocated to Crystal Palace Park for its opening. The park is recognised as the first theme park of its kind in the world and the Crystal Palace was located on the highest western side of the park adjacent to Crystal Palace Parade on what is now known as the 'Palace Terrace' with a series of Italian Terraces and steps located to the east following the park's sloping topography. These terraces originally contained Italianate gardens and fountains which were influenced by the Palace of Versailles. The original layout of the park was orchestrated around the Paxton Axis – a central direct route through the middle of the park connecting the Palace to Penge Gate in the east.

18 Whilst the Palace was a popular cultural and event venue during the Victorian and Edwardian era it fell in to decline and the company running the Palace and the park was declared bankrupt in 1911. Fire destroyed the Palace in 1936 and the park was used as a dump for bombsite rubble during and after the London Blitz. The National Sports Centre was constructed by the London County Council during the early 1960s as part of a wider masterplan which was never completed in its entirety. As evident from the park's status on the heritage at risk register, many of original features of the park are in a poor state of repair and in urgent need of maintenance and restoration, with areas around the upper and lower terraces fenced off for structural and safety reasons. This western part of the park which includes the Palace Terrace and Italian Terraces is of a substantial size and scale but is a relatively uninviting and under-utilised section of the park in need of restoration and improvement.

Details of the proposal

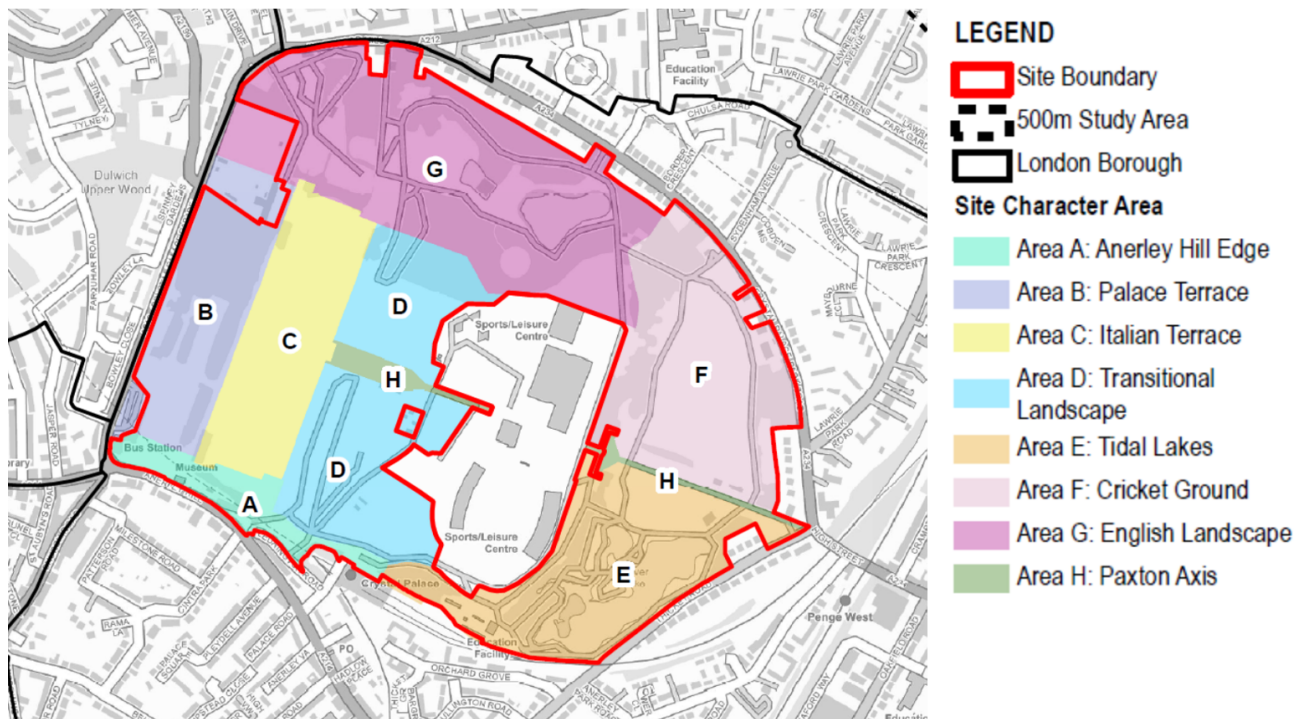
19 The application seeks outline planning permission (with all matters reserved except access) for the provision of up to 210 residential dwellings to part fund a comprehensive phased regeneration of Crystal Palace Park, including the restoration of heritage assets, park improvements, new educational facilities and enabling residential development. In summary, this would include the following:

- **conservation and repair of heritage assets** – including the Upper and Lower Italian Terrace walls; the prehistoric Animal Structures; the bust of Sir Joseph Paxton; the gate piers to Rockhills; the north and south railings and walls along Crystal Palace Parade; a section of the Crystal Palace basement wall (Paxton Tunnel Wall); and the Colonnade Wall.
- **landscape improvements** – including the removal of clutter and fencing; improvements to pedestrian routes; biodiversity enhancements; restoration of historic views and the central park axis; the re-establishment of parkland and associated landscape; a new dinosaur themed playground.
- **earthworks** – re-profiling and landscaping of the Upper and Lower Palace Terraces to create gardens and an event space, with associated utilities infrastructure; re-profiling of the landscape in the Transitional Landscape Area (see Figure 2 below); works to create a new maintenance depot adjacent to Sydenham Gate.
- **removal of existing hard surfaces** – including the car and coach parking within the Transitional Landscape area and hardstanding associated with the existing playground and caravan club site and Capel Manor College farm site.
- **demolition of the following buildings and structures:**
 - the *Diddy Dinos* nursery, St John's Ambulance facility, park ranger's lodge and park depot adjacent to Crystal Palace Park Road
 - the existing buildings at the Capel Manor College farm site
 - the existing buildings within the caravan site
 - the park information centre
 - the maintenance building to the east of the Crystal Palace Museum
 - four substations
- **the construction of new buildings and structures** comprising:
 - a cultural venue in Class D2 use (up to 2,300 sq.m.)
 - a community centre in Class D1 use (up to 670 sq.m.)
 - up to 4,516 sq.m. of educational use in Class D1 use and ancillary shelters and outbuildings at two sites - the Capel Manor College Farm Site and Capel Manor College Anerley Site;
 - up to 530 sq.m. of park maintenance facilities (Sui Generis) including the dismantling and reconstruction of existing maintenance depot;
 - up to 150 sq.m. information centre (Use Class D1);
 - up to 18,847sq.m. of (enabling) residential development to provide up to 210 residential dwellings (Class C3 use) within two sites at Rockhills and Sydenham Villas, as described in more detail below.

- **access improvements** - alteration to highways access at Anerley Hill Gate entrance, Penge Gate car park, Old Cople Lane (Rockhills Gate), Sydenham Gate car park and the creation of three additional accesses for the residential development at Rockhills and Sydenham Villas, together with improvements to highways, pedestrian and cycle routes throughout the park.
- **modification of public car and coach parking** – to provide 136 car parking spaces and 10 coach parking spaces (an overall net reduction of 339 spaces and 1 coach parking space)
- **change of use** of the caravan site to part public open space and part residential.

20 The various landscape character areas referred to are shown below in Figure 2.

Figure 2 – landscape character areas



21 In terms of enabling residential development, 140 residential units are proposed at Rockhills within two 5-storey blocks with 84 car parking spaces, and Sydenham Villas would contain up to 70 residential units within up to six blocks with building heights up to 4-storeys with 43 car parking spaces (a car parking ratio of 0.6 in both instances). The total quantum of existing buildings floorspace proposed for demolition is 2,818 sq.m. and the total amount of floorspace proposed for new buildings would be 27,043 sq.m. This is set out by land use in Tables 1 and 2 below:

Table 1 - Existing building footprint to be demolished by land use (GEA)

Use Class	Floorspace (sq.m.)
D1	941
Sui Generis	1,877
Total	2,818

Table 2 – Proposed building footprint to be constructed by land use (GEA)

Use Class	Floorspace (sq.m.)
Total D1 use (college sites, nursery and information centre)	5,366
D2 cultural venue	2,300
C3 residential	18,847
Sui Generis	530
Total	27,043

22 The outline application includes parameter plans and a development specification and framework document. The development specification provides a more detailed description of the outline proposals for which planning permission is sought, which is summarised below. The parameter plans establish minimum and maximum physical limits for the development and an illustrative masterplan has been submitted which depicts the applicant's overall ambitions for the project. The applicant has stated that Listed Building Consent applications will be submitted alongside the Reserved Matters Applications.

Case history

23 The site has an extensive planning history. Most recently and of most relevance to this application is the 2007 masterplan submitted by the London Development Agency (LPA Ref: 07/03897/OUT; GLA ref: 1295a). This hybrid planning application (part outline/part detailed) proposed the comprehensive phased regeneration of the park, including landscape and access improvements and the restoration of heritage assets and enabling residential development. Planning permission was granted by the Secretary of State on 13 December 2010 following a Public Inquiry. Although similar to the current proposals in some respects, the 2007 masterplan and planning application covered the entire park and included the refurbishment of the Grade II* listed National Sports Centre, the demolition of peripheral sports facility buildings and structures including the park's elevated concrete walkway and platform, Lodge Tower and other residential dwellings and the construction of a new regional sports centre over two-storeys cut into the landscape and topography of the park with a green roof.

24 The various heritage assets listed above were also proposed to be restored and enhanced as part of the proposals including the terraces, subway and dinosaurs. The scheme also included the construction of two large green houses, one of which would be on the site of the Grade II listed Italian Terrace, with the other one located within the English Landscape area. A new cricket pavilion building was also proposed and the enabling residential development was in the form of 180 residential units on the same development sites – Rockhills and Sydenham Villas – as is proposed in the current application. This figure is slightly below the 210 units proposed in the current application, but was subject to the same maximum building height parameters.

25 Whilst this scheme was never completed, the applicant has stated that this planning permission is extant. However, it is unclear to GLA officers which elements of the proposal have been implemented and this should be confirmed so that GLA officers can reach a fully informed view of the weight that should be given to the decision and planning consent granted by the Secretary of State in 2010.

26 In terms of pre-application advice on the current scheme, a GLA pre-application meeting took place on 13 December 2017 and a GLA pre-application advice note was issued on 11 April 2018. In summary, GLA officers strongly supported the applicant's efforts to secure a high-quality restoration of the Park's historic features and landscape, and very strongly recommended that the applicant and its advisors continue to work closely with the owners, operators and users of the National Sports Centre so that emerging plans and thinking would very closely align and demonstrate how the entire park could be successfully restored. The GLA's advice note also confirmed that the provision of housing within MOL would be contrary to the London Plan and draft London Plan, as would a lack of affordable housing. It was finally confirmed that the loss of the caravan park would also be contrary to the London Plan.

27 More recently a further GLA pre-application meeting took place on 16 January 2020 and a further GLA pre-application advice note was issued on 27 January 2020. This set out a number of key outstanding strategic planning concerns with the proposals including the impact on MOL and the applicant's presented very special circumstances case; the absence of affordable housing, the extent to which all potential options to provide affordable housing had been explored ; integration and alignment with proposals for the National Sports Centre and the degree of certainty that a comprehensive scheme for the entire park could come forward and would not be compromised by

the proposal being delivered in isolation. A number of transport issues in relation to parking levels and transport safeguarding were also identified.

28 Separate to this, a GLA pre-application meeting was also held on 11 December 2018 on Capel Manor College's proposals at its Anerley & Farm sites which fall within the proposed site boundary and for which a formal GLA pre-application response was issued on 25 March 2019. This note recognised that the applicant's stated the educational need for new and replacement facilities and the benefits of the proposal could constitute very special circumstances case for inappropriate development in MOL, subject to this outweighing the harm caused and the design of the scheme minimising the proposed built form and ensuring mitigation measures were optimised to reduce the level of harm as much as possible. In addition, the applicant was advised that the outstanding matters regarding the Tramlink issue of (see transport section) should be resolved satisfactorily, together with other matters in relation to transport, heritage and sustainable development.

Strategic planning issues and relevant policies and guidance

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

30 The following are relevant material considerations:

- The National Planning Policy Framework:
- National Planning Practice Guidance
- The London Plan Intend to Publish version (December 2019) – which should be taken into account on the basis set out in paragraph 48 of the NPPF.
- The Secretary of State's 13 March 2020 Directions issued under Section 337 of the Greater London Authority Act 1999 (as amended) to the extent that these are relevant to this particular application they have been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation.
- The Mayor's Affordable Housing & Viability Supplementary Planning Guidance
- The Secretary of State's 2010 decision to grant planning permission for the 2007 Crystal Palace Park Masterplan (LPA Ref: 07/03897/OUT; GLA ref: 1295a).

31 The relevant strategic issues and corresponding policies are as follows:

- Principle of development *London Plan; Intend to Publish London Plan;*
- Housing and affordable housing *London Plan; Intend to Publish London Plan;*
- Urban design and heritage *London Plan; Intend to Publish London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG;*
- Inclusive access *London Plan; Accessible London: Achieving an Inclusive Environment SPG;*
- Climate change *London Plan; Sustainable Design and Construction SPG; London Environment Strategy;*
- Transport *London Plan; the Mayor's Transport Strategy;*

Principle of development

Metropolitan Open Land (MOL)

32 As set out above, Bromley Council has recently adopted a new Local Plan (2019) and no changes were made to the extent of designated MOL within Crystal Palace Park. Whilst the proposed

enabling residential development at Sydenham Villas site falls outside of the designated MOL, the following proposed buildings would fall within the MOL:

- the education buildings and ancillary shelters and outbuildings for Capel Manor College at the existing Capel Manor College Farm Site and the proposed new site on Anerley Hill
- the cultural venue
- residential and community use buildings at Rockhills (existing caravan site)
- replacement park maintenance facilities
- replacement park information centre

33 London Plan Policy 7.17 and Policy G3 of the Mayor's Intend to Publish London Plan state that Metropolitan Open Land (MOL) should be afforded the same planning policy status and level of protection as the Green Belt, in accordance with the 2019 National Planning Policy Framework (NPPF). As set out in the NPPF, inappropriate development is, by definition, harmful to the Green Belt/MOL and should not be approved except in very special circumstances. Paragraph 144 of the NPPF states that local planning authorities should ensure that substantial weight is given to any harm to the Green Belt when making planning decisions and confirms that very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. This principle therefore extends to designated MOL.

34 The construction of new buildings within MOL is considered inappropriate development apart from a limited number of specific forms of development set out in the exceptions listed in paragraph 145 of the NPPF, would be considered not inappropriate. Of potential relevance to this application, this list of NPPF exceptions at paragraph 145 includes:

(a) buildings for agriculture and forestry;

(b) the provision of appropriate facilities for outdoor sport and outdoor recreation, providing these facilities are connected to the existing use of land and preserve the openness, whilst also not conflicting with the purposes of including land within the Green Belt/MOL;

(d) the replacement of a building, providing the new building is 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, providing this would not have a greater impact on the openness compared to the existing development; or not cause substantial harm to openness where affordable housing is proposed which would meet an identified need.

35 Previously developed land is defined as land which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure; however, the NPPF glossary definition prescribes that parks cannot constitute PDL.

The extent of inappropriate development in MOL

36 In summary, GLA officers consider that the majority of the proposed buildings would be inappropriate development with the exceptions being the new park information centre and maintenance facility which would be not inappropriate development, the rationale for which is set out in more detail below for each of the main elements of the proposed development.

Rockhills (caravan club site)

37 The proposals for 140 residential units, together with associated parking and a community centre and nursery at the Rockhills site would comprise inappropriate development given that the proposed new buildings would cover a significantly extended building footprint compared to the limited number of permanent buildings located on the existing caravan site. So, whilst it could potentially be argued that the caravan site no longer forms part of the park (though this should be clarified by the applicant), the proposed buildings would adversely impact openness and accordingly, NPPF exceptions would not apply to this element of the scheme.

Capel Manor College sites

38 This element of the scheme proposes new buildings spread over two separate sites for Capel Manor College at the existing urban farm site and the site on Anerley Hill adjacent to the Crystal Palace Museum. In both instances, the proposed primary use of the new buildings is for educational use, rather than agriculture and forestry, so exemption (a) of the NPPF does not apply. The submitted parameter plans confirm that the new buildings proposed on both sites would be materially larger than the existing buildings being replaced, and in both instances, there would be harm to openness. Consequently, NPPF exemptions (b) and (d) would not apply and the proposals therefore constitute inappropriate development within the MOL.

Cultural venue

39 The proposed cultural venue adjacent to the Crystal Palace Subway includes the construction of a new building on the Palace Terrace which would not preserve openness of the MOL and would therefore comprise inappropriate development within MOL.

Information centre and park maintenance facility

40 The replacement park maintenance facility would be relocated to the site of the existing park rangers' building at Sydenham Gate which would be demolished. This building does not lie within MOL and whilst the new park maintenance facility would marginally extend into the designated MOL, the majority of the footprint of the proposed building would be outside the MOL. The new information centre would be located on the site of the existing information centre. In both instances, the proposed buildings comprise appropriate facilities connected with the park and would preserve the openness of the MOL. As such, both of these elements fall under the NPPF exception (b) and would be appropriate development within MOL and supported in land use terms.

Assessment of harm to the openness of the MOL arising from inappropriate development

41 The National Planning Practice Guidance (NPPG) states that assessing the impact on openness is effectively a planning judgement based on the circumstances of a particular application. Drawing on case law, the NPPG also confirms that openness is capable of having both spatial and visual aspects and it may be relevant to assess both components, as well as other factors such as duration and remediability of a proposal and the degree of activity generated^[1].

Rockhills (caravan club site)

42 The existing caravan club site measures 2.43 hectares, of which, approximately 1.03 hectares is currently covered by hardstanding and a total of five one and two-storey buildings with relatively small building footprints the majority of which are clustered to the north of the site. Whilst the applicant has not confirmed the footprint of the existing buildings, the submitting plans show that the vast majority of the 1.03 hectare area mentioned above comprises hardstanding rather than buildings. In visual terms the site contains a number of mature trees which are clustered around the northern part of the site, along Old Cople Lane and around the perimeter of the site with the park and the topography rises steeply to the north. As a result, whilst the rear of the main reception building is visible from Westwood Hill, there is currently very limited visibility into the site from the park.

43 In spatial terms, the application proposes a significant increase in overall building footprint and their height and mass which would harm the openness. This has been generally minimised to some extent by the placement of buildings at the far northern perimeter of the site parallel to Westwood Hill, within the area of the site which contains the majority of existing buildings. In visual terms, having undertaken site visits and had regard to the applicant's Townscape and Visual Impact Assessment (TVIA), GLA officers consider that due to the way the caravan site functions as a private site and its topography and landscape context, the visual impact of the proposed development from within the existing park (to the south) would be limited. Notwithstanding this, the size, scale and

[1] MHCLG, NPPG, Paragraph: 001 Reference ID: 64-001-20190722

massing of the proposed buildings would have a significant impact on openness as viewed from Westwood Hill, albeit the visual impact would not be as significant from within the park.

Capel Manor College farm site

44 The existing Capel Manor College urban farm site is located on relatively steeply sloping land adjacent to the south-east boundary of the park adjacent to the railway. It contains a croft building in educational use, along with a number of smaller stables, outbuildings and animal pens which surround a central yard. The total coverage of the existing buildings is approximately 689 sq.m. The application proposes the site's redevelopment to construct two new U-shaped courtyard buildings facing onto central yards, providing 3,399 sq.m. of educational floorspace with a further 380 sq.m. of additional ancillary outbuildings and shelters. As such, in spatial terms there would be a relatively significant increase in the size, scale and massing compared to the existing buildings, particularly at the western part of the site. This would cause harm to the MOL. In visual terms, the applicant's TVIA demonstrates that the proposed building would be highly visible from the adjacent pathway which leads down to the dinosaur lake from Crystal Palace Station. The U-shaped layout and design of courtyards would however to some extent minimise the harm to the MOL by placing the majority of the built form parallel with the railway and towards the periphery of the park. The sloping topography and landscape context could also enable a high quality new building to blend into the landscape in this location, subject to the illustrative materials approach being secured.

Anerley Hill site

45 There are very few existing buildings on the Anerley Hill site beyond shipping containers and a small maintenance building. The site is visually segregated from the rest of the park due to the presence of a 1.8 metre brick wall along Anerley Hill and landscape screening on the depot's boundary with the park. The application proposes the construction of a 602 to 737 sq.m. L-shaped building in education use fronting Anerley Hill to provide five new workshops/studios for Capel Manor College with a main entrance on Anerley Hill and service yard to the rear. Some trees would be removed but the majority of the landscape screening would be retained on the park side. There would be increase in the built footprint and massing and scale which would cause harm. The applicant's TVIA shows that the visual impact would be restricted to views from Anerley Hill and from the lawns in front of the lower Italian Terrace where glimpsed views of the building would be seen between the trees.

Cultural venue

46 The Cultural Venue would be located on undeveloped land adjacent to the Palace Terrace and subway parallel to Crystal Palace Parade. The proposed building would be between 12.5 to 14 metres in height and cover an area of MOL approximately 40 metres wide and 13 metres deep. Indicative plans show the building as three storeys, with a ground floor café, reception and shop and exhibition space at first and second floor level, as well as the basement and subway. Overall, taking into account the existing and proposed situation and the applicant's TVIA, GLA officers consider that the impact of this proposed building on the openness of the MOL would be significant. However, due to the topography and visibility of the site, the visual impact would be localised.

Very special circumstances

47 The applicant's case for very special circumstances can be broadly summarised as follows:

- Heritage benefits – Ensuring the restoration and repair of highly significant designated heritage assets and preventing their continued deterioration and decay and improving their condition with the aim of removing the assets from the Heritage at Risk Register. These include: the Grade I listed dinosaurs; the Grade II* Crystal Palace Park as a whole; the Grade II* Crystal Palace Pedestrian Subway; the Grade II listed Upper and Lower Terrace; and Grade II listed north and south railings, walls and boundary marker at Crystal Palace Park Parade. Improving the setting of these assets by restoring key elements of the original historic landscape design including the Paxton Axis. Improving the extent to which the significance of heritage assets can be appreciated

by visitors. These proposals would also significantly enhance the character and appearance and overall significance of the Crystal Palace Conservation Area.

- Community benefits – Enhancing the facilities available within the park for recreational use including sporting and play facilities; increasing the quantum of land within the park that would become publicly available and which is not currently publicly accessible (+1.52 hectares of land located in the existing caravan club site, which would be returned to park land and made publicly accessible); removing the fencing around the Intermediate Lake which is currently restricted to enable public access and views across the lake; improving access and circulation routes and entrances available within the park to enhance its use and addressing key movement barriers and improved levels of inclusive access; improving the degree and quality of public access to the Capel Manor College facilities.
- Educational benefits – educational need for enhanced replacement facilities for the college which is the only college in London specialising in education and training for environment and land-based industries. The applicant has also stated that the landscape and horticulture students on site would support the ongoing management and maintenance of landscaping within the park and that the current premises are not fit for purpose.
- Cultural benefits - the applicant states that the cultural venue is required to secure the long-term management and use of the Crystal Palace subway, which is on the Heritage at Risk Register and not currently accessible to the public. It would also provide further overall cultural benefits associated with the provision of a visitor attraction and event space in this location of the park.
- Economic benefits – associated with increased visitors to the park, as well as students and employment associated with the college, events and cultural facility.
- Recreational benefits – associated with the provision of enhanced open space, landscape improvements and provision of more diverse range of recreational, play and sporting opportunities.

Enabling residential development

48 A key element of the applicant's case for very special circumstances is that enabling residential development, including inappropriate residential development within the MOL at Rockhills is required to help fund the costs of the restoration works. In summary, the regeneration plan is currently anticipated to cost approximately £40 million, with the majority comprising capital costs associated with the proposed heritage restoration works, earthworks, landscaping, access and play space improvements across the park. In addition to these costs, the applicant envisages the ongoing management and running of the park via a trust and that this would be made economically sustainable as a result of the ongoing revenue generated by events within the park and also an initial capital endowment of £4.3 million, which is also included within the scheme costs. Based on the level of grant and other funding expected to be available, the applicant envisages that there would be an overall funding gap of £24.2 million. The applicant's Financial Viability Appraisal suggests that this shortfall would be closed by the proposed residential development. However, this is predicated on both sites providing 100% market sale housing, with no affordable housing provided. This is contrary to the Mayor's strategic target that 50% of all new homes in London should be affordable and that public sector sites such as this should maximise the delivery of affordable housing and be subject to an affordable housing threshold of 50%.

Phasing and delivery of public benefits

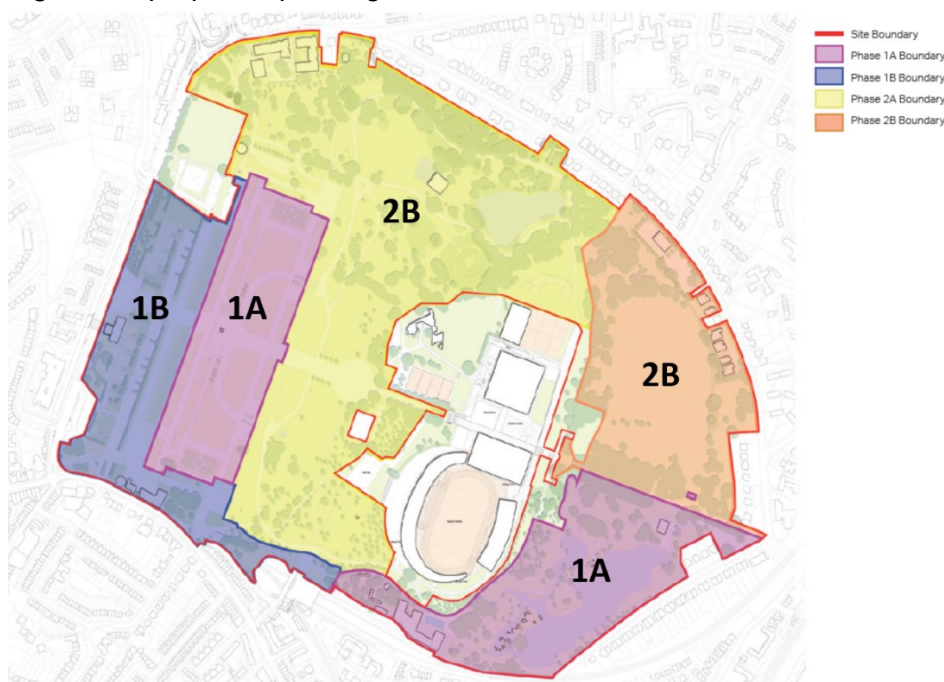
49 The applicant's indicative phasing programme shows that the main heritage restoration works would take place in the first two phases, with the proposed residential development in the last two phases. This is summarised below:

- Phase 1A focuses on the Italian Terrace and the Tidal Lakes, including the Information Centre; and Capel Manor College Farm site.

- Phase 1B would comprise works to the Palace Terrace, subway, cultural venue and Anerley Hill Edge including the new Anerley Hill campus.
- Phase 2A would focus on the English Landscape and Transitional Landscape areas including the upper section of the Paxton Axis. This phase would include the Rockhills residential scheme and areas of the caravan park being returned to public access and park use.
- Phase 2B will be focussed on the Cricket Ground and associated lower section of the Paxton Axis and would include the Sydenham Villas residential development.

50 This approach to phasing is supported in principle as it would ensure that the key public benefits listed above and which contribute towards the applicant's very special circumstances case would be delivered before the enabling residential development commenced. Should planning permission be granted, this approach should be robustly secured by a planning obligation and/or Grampian condition, with the capital receipts generated from the enabling residential development clearly ring fenced to deliver the identified enhancements. The wording and design of any such condition or obligation will require further detailed discussion. Further detail would also be needed to confirm the timing and delivery of other public benefits, for example, enhancements to access, circulation, landscaping and play space.

Figure 2 – proposed phasing



Assessment of the applicant's case for very special circumstance

Heritage benefits

51 GLA officers recognise that there are range of substantial benefits associated with the restoration and repair of heritage assets which are on the Heritage at Risk Register and are individually and collectively of a high level of significance. This element of the scheme is therefore strongly supported. The urgent need for the works to be undertaken to prevent the further deterioration or loss of the heritage assets is also acknowledged. As such, appropriate weight must be given to the conservation and enhancement of these heritage assets.

52 Given the extent of the required heritage restoration works, the costs associated with this element of the scheme are significant and it is noted that detailed surveys have been undertaken, and whilst an itemised cost plan has been provided as requested at pre-application stage, this will need to be independently verified to ensure that its assumptions are valid. GLA officers also note that these costs are estimates at this stage, given the outline nature of the scheme.

53 In addition, the proposals will require significant levels of grant funding to ensure overall viability which has not yet been secured. Furthermore, there is no the necessary grant funding applications will be successful, thereby raising important deliverability concerns. It is also not clear what would happen if insufficient funding was secured.

54 It is also unclear which elements of the scheme the enabling residential development would fund, for example, what elements of the scheme could be delivered without the inappropriate enabling residential development on MOL. Furthermore, although the applicant has modelled the impact of providing affordable housing within the scheme (which shows the funding shortfall is increased), the applicant has not set out what elements of the scheme could be either removed or revised to enable affordable housing to be provided. Hence, whilst the application potentially allows significant heritage benefits to be realised, the applicant has not yet demonstrated that these benefits are fully deliverable or whether they are dependent on the inappropriate zero affordable residential MOL development it is proposing.

Community and recreational benefits

55 The proposed community and recreational benefits mainly comprise increased public access to areas of the park which are not currently accessible (+1.52 hectares) and improvement to the park's landscape, recreational, sporting and play space facilities and access routes. These would all comprise significant public benefits which are strongly supported and for which there is a clear need. However, these benefits could potentially be achieved in other ways, for example grant funding, car parking charges, or direct Council contributions. Hence, as set out above, the applicant has not yet demonstrated that these community and recreational benefits are contingent on the inappropriate residential development on MOL. Further information and discussion is therefore required before GLA officers can reach an informed conclusion on whether the public benefits associated with the proposed heritage, community and recreational benefits do necessitate inappropriate enabling residential development at Rockhills and whether this would outweigh harm to the MOL they would cause and other harm.

Educational benefits

56 The educational need for the new educational buildings and the educational benefits associated with their provision has been satisfactorily demonstrated. Capel Manor is the only college in London that specialises in education and training for the environment and land-based industries, including vocational qualifications and apprenticeships. The college's existing facilities are located within the farm site and the Jubilee Stand within the National Sports Centre, and the applicant has demonstrated that there is a clear need for improved and larger replacement facilities. The college is strongly linked to the park and would be involved in the park's ongoing maintenance. A review of alternative available sites (which would potentially cause less harm to the MOL) has been undertaken and no available alternative sites have been identified.

57 The public benefits associated with the new buildings in terms of the provision of specialist skills, education and training, larger and enhanced facilities with improved public access at the existing farm site are significant. As such, and taking into account the size and scale of the proposed new buildings and their spatial and visual impact, GLA officers consider that the educational benefits set out above would comprise very special circumstances that would clearly outweigh harm to the openness of the MOL and any harm by reason of inappropriateness. However, the applicant's very special circumstances case must be assessed as a whole as it is a single outline application.

Cultural benefits

58 As set out above, the applicant's very special circumstances case for this element of the scheme is based on its role in ensuring the long-term management and use of the Crystal Palace subway, which is on the Heritage at Risk Register and not currently accessible to the public. The venue would also provide cultural benefits by creating a new visitor attraction and event space in this part of the park. Significant weight should be attached to the potential to restore a Grade II* listed

heritage asset, ensure its significance can be appreciated and to return the space to an optimum viable use, in line with the NPPF. However, the stated cultural benefits have not been fully demonstrated and further detail is required on the proposed use of the venue and programme of events. In addition, further detail is required to explain and justify the footprint, scale and height of the proposed building to demonstrate that harm to the MOL and any other harm has been minimised. As such, GLA officers do not consider that very special circumstances for this element have been sufficiently demonstrated at this stage.

Economic benefits

59 Whilst increased visitors and jobs within the site would have a positive impact, this would not constitute a very special circumstances and justify the proposed harmful inappropriate development. The provision of additional employment opportunities and the enhanced visitor experience of the park are recognised and accepted as one element of the applicant's VSC case.

Conclusion – Very special circumstances

60 In summary, GLA officers consider that whilst very special circumstances have been demonstrated which would clearly outweigh the harm caused to the MOL and other harm in relation to the proposed educational buildings at the Capel Manor College farm and Anerley Hill sites, the application must be considered as a whole and very special circumstances have not been demonstrated in relation to the inappropriate development at Rockhills and the proposed cultural venue.

Visitor infrastructure

61 London Plan Policy 4.5 and Policy E10 of the Mayor's Intend to Publish London Plan support the provision of a range of visitor infrastructure, including camping and caravan sites in appropriate locations. These policies are relevant to the principle of the development given the proposed loss of the existing caravan club site, which is one of only three such sites within London. Loss of this facility would therefore significantly reduce the number of specialist touring facilities available within London and therefore the loss of this facility will need to be balanced against the overall public benefits of the scheme.

62 The applicant has stated that it has sought to relocate the caravan site to an alternative site within Bromley, and AECOM were commissioned to undertake a review of potential sites. However, all potential sites were considered unsuitable due to loss of publicly accessible land, vehicle access constraints and impacts on neighbouring residents. The applicant has therefore concluded that there are no suitable sites for the caravan park within Bromley Whilst it would be preferable for the caravan club site to be relocated as part of the proposed scheme, this is not proposed and GLA officers acknowledge that the caravan club is of a specialist nature which would be potentially hard to relocate within Bromley. It is therefore suggested that the applicant consider possible sites elsewhere in south London and not just within Bromley given the regional role of the facility offers.

Community, social and health infrastructure

63 London Plan Policies 3.16-3.18 and Policies S1-S3 of the Mayor's Intend to Publish London Plan support the provision of high quality, new and enhanced social infrastructure, including healthcare, education, childcare and community uses in accessible locations. Conversely, the loss of social infrastructure in areas of defined need should only be permitted where replacement infrastructure is provided; or where proposals form part of a wider infrastructure delivery and investment programme to meet future population needs and improve services. Replacement facilities should be operational before existing facilities are demolished to ensure continuity of social infrastructure provision.

64 As set out above, the application proposes to demolish the *Diddy Dinos Nursery* to enable the residential development at Sydenham Villas. This facility would be replaced by a new nursery at the Rockhills site, which would be located within a stand-alone two-storey community building adjacent to the park. In terms of phasing, the applicant has stated that the new community facility/ nursery would

be completed prior to the existing nursery being demolished to ensure continuity of social infrastructure and child care facilities. The existing and proposed nursery floorspace should however be confirmed. Subject to there being no net loss in terms of floorspace and the phasing approach set out above being appropriately secured, this element of the proposed development would comply with the relevant policies in the London Plan and the Mayor's Intend to Publish London Plan relating to social infrastructure and childcare facilities.

65 The St Johns Ambulance facility would also be demolished as part of the proposals to facilitate the provision of residential development at Sydenham Villas. GLA officers require further information on the nature of the existing facility and where this facility would be relocated to, to ensure this element of the scheme accords with relevant policies in the London Plan and the Mayor's Intend to Publish London Plan relating to social infrastructure and health care facilities. Clarification from the infrastructure provider is sought in this respect to confirm whether this facility is surplus to their requirements or being relocated.

Conclusion – principle of development

66 Improvements to the park in relation to landscape, heritage, access and recreation are strongly supported. However, the application proposes inappropriate development on Metropolitan Open Land (MOL) which would cause harm to openness. Very special circumstances have not been demonstrated which would clearly outweigh this harm. As such, the application is contrary to the NPPF and London Plan. Harm caused by the loss of the specialist caravan site facility could be outweighed by the range of public benefits proposed, but a wider alternative site search should be carried out. Further discussion is required in relation to social infrastructure facilities

Housing and affordable housing

Affordable housing and viability

67 London Plan Policies 3.11 and 3.12 and Policy H4 of the Mayor's Intend to Publish London Plan seek to maximise the delivery of affordable housing, with the Mayor setting a strategic target of 50%. Policy H5 of the Mayor's Intend to Publish London Plan identifies a minimum threshold of 50% affordable housing (by habitable room) for sites in public ownership. In terms of tenure split, Policy H7 of the Intend to Publish London Plan sets out the Mayor's preference for at least 30% low cost rent (social rent or London Affordable Rent) and 30% as intermediate housing products, with the remaining 40% to be determined by the Council. Bromley Council's Local Plan sets a target for 35% affordable housing with a 60/40 split between social rent/ affordable rent housing and intermediate provision.

68 At present, the scheme does not propose any affordable housing, contrary to the above strategic policies, with the applicant stating that the provision of affordable housing would make its proposals unviable as the entire capital receipt generated by the enabling residential development at Rockhills and Sydenham Villas is needed to deliver the scheme and help meet the funding shortfall set out above.

69 Affordable housing is however required by national, London and local policy, and the applicant must set out all available options to provide affordable housing, including through grant funding, different options in terms of tenure mix, and by providing affordable housing off-site or via a cash in lieu contribution. These options have not been fully explored or tested and this should be fully scoped and discussed prior to the application being referred to the Mayor at Stage 2.

70 The applicant's current FVA has also been scrutinised by GLA officers and further information has been requested to clarify some of the appraisal's inputs to allow GLA officers to reach an informed view as to whether the scheme could viably support affordable housing. The applicant has also been asked to confirm which elements of its proposals would not be delivered should affordable housing be provided. Finally, early and late stage viability reviews will be required for the residential sites, in accordance with the Viability Tested Route should permission be granted. These should accord with the guidance and formulas set out in the Mayor's Affordable Housing and Viability

Supplementary Planning Guidance and the GLA’s standard template s106 clauses which have been sent to the Council and applicant.

Housing mix

71 London Plan Policy 3.8 states that new development should provide a mix of housing sizes and types, taking into account local and strategic housing requirements, the needs of different groups, the strategic priority for affordable family housing provision and the need to support the private rented sector. Policy H10 of the Mayor’s Intend to Publish London Plan states that schemes should generally consist of a range of unit sizes and sets out a number of factors which should be considered when determining the appropriate housing mix on a particular scheme. This includes housing need and demand, the nature and location of a site, the requirement to optimise housing potential and deliver mixed and inclusive neighbourhoods.

72 Although the exact housing mix is not included within the development specification, the applicant’s planning statement confirms that, based on the footprint and height of the proposed residential buildings, it envisages the 210 residential units would comprise 99% one and two-bedroom units, with the majority being two bedroom sized units (69%). Overall, taking into account the site locations, constraints and PTAL, as well as the characteristics, density, form and tenure of the proposals, GLA officers consider that the proposed housing mix is acceptable in strategic planning terms.

Table 1 – Proposed unit mix (all market tenure)

	Rockhills	Sydenham Villas	Total	%
1-bedroom	55	9	64	30%
2-bedroom	83	61	144	69%
3-bedroom	2	0	2	1%
Total	140	70	210	

Children’s play space

73 Policy 3.6 of the London Plan states that development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. Policy S4 of the Mayor’s Intend to Publish should incorporate high quality, accessible play provision for all ages, of at least 10 sq.m per child. Play space provision should normally be provided on-site; however, off-site provision may be acceptable where it can be demonstrated that this would address the needs of the development and can be provided nearby within an accessible and safe walking distance, and in these circumstances contributions to off-site provision should be secured by a Section 106 agreement. Play space provision should be available to all housing tenures within immediately adjacent blocks and courtyards to promote social inclusion.

74 The applicant has used the GLA’s updated play space calculator (2019) to estimate the likely child yield and play space requirement its current proposals would generate. This shows an expected child yield of 59 children , resulting in a play space requirement of 584 sq.m. The applicant has stated that doorstep play space facilities for children under 4 years of age would be provided within 150 metres of the two residential sites, within the park itself, with further play space facilities for all age groups available within the wider park. This approach is not supported in the case of the Rockhills site which is large enough to accommodate play space provision for children under 4 within the site, in line with the above strategic policies and guidance. Further justification is required to demonstrate why play space provision for children under 4 cannot be accommodated on site in the case of the two Sydenham Villas sites. The final agreed play space strategy, including both on-site and off-site provision would need to be secured by condition and obligation.

Urban design and heritage

Design, layout, public realm and landscaping

75 London Plan Policies 7.1 to 7.5, together with Policies D1-D3, D8 of the Mayor's Intend to Publish London Plan seek high quality design set out a range of urban design principles relating to the quality of public realm, the provision of convenient, welcoming, legible and permeable movement routes and layouts and highlight the importance of designing out crime by, in particular, maximising the provision of active frontages and minimising inactive frontages.

76 Whilst Crystal Palace Park is a well-used local and regional park which is of national and international significance in terms of its history and the range of important heritage assets located within it, the park currently contains a number of under-utilised areas and heritage assets which are in a state of disrepair and in urgent need of restoration to address their continued decline. A number of areas of the park are not publicly accessible, including the caravan club site, Intermediate lake, spaces around the Palace Terrace and the upper and lower Italian Terraces, which are fenced off for structural and safety reasons. Substantial central areas of the park within the Intermediate Landscape Area are also dominated by hard landscaping and car parking. In addition, although certain areas of the park have retained their original historic character and have a strong sense of place, for example, around the boating lake, Tidal Lakes and English Landscape area, and along the tree-lined western section of the original Paxton Axis; ease of movement and legibility across many other areas of the park is lacking, which creates a relatively fragmented landscape which is exacerbated by level changes.

77 The regeneration plan developed by Bromley seeks to build on Paxton's original vision for the park as a single-designed landscape, with a strong focus on the Palace site by re-establishing the central Paxton Axis and providing a mix of formal and informal landscape areas for play, sport, recreation and cultural and entertainment events. The proposed scheme would address many of the above issues by:

- physically restoring and enhancing the appreciation of heritage assets, including ensuring the improved public access and enjoyment of the terraces and subway;
- bringing a significant area of the park back into public access for use by visitors to the park, including the fenced off areas covered by the caravan club park, fishing lake and areas around the Palace and Italian Terraces;
- improving pedestrian and cycle routes and park entrances, including providing additional entrance at Rockhills and providing a range of enhanced step-free all-weather routes;
- removing large areas of hard-standing and car parking within the central Intermediate Landscape Area;
- providing new play areas and community facilities;
- enhancing the existing college facilities and better integrating these into the park and the adjacent local area;
- improvements to landscape, biodiversity, planting, plays space and views.

78 As requested as pre-application stage, the applicant has provided further information to show the extent to which its regeneration proposals for the park are capable of being successfully integrated with the emerging proposals for the National Sports Centre which is being progressed to slightly different timescales by the GLA. Having considered this further information, GLA officers are content that the two schemes could be successfully progressed as stand-alone schemes, whilst ensuring the coherent regeneration of the entire park. Whilst noting the outline nature of the proposed application and level of detail available at this stage, GLA officers do not consider there to be any particular proposals contained within this application would prejudice the latter scheme from coming forwards in a successful and well-integrated manner.

79 The layout, design, height and massing proposed for the Sydenham Villas site is supported. This is generally consistent with the 2010 planning permission and would ensure the provision of six individual blocks ranging in height up to 4-storeys. This would be consistent with and relate positively to the prevailing height, massing and layout of residential buildings within the Crystal Palace Conservation Area and would ensure the new buildings would form an appropriate relationship the park to the west and Crystal Palace Park Road to the north.

80 Two open courtyard buildings would be provided at Rockhills up to 5-storeys in height which would also form a strong relationship with Westwood Hill in terms of layout, height and massing, with surface car parking provided mainly to the rear and a central access road. Whilst this layout arrangement helps to minimise the impact on the MOL, GLA officers are concerned that the spaces to the rear of residential blocks would be dominated by car parking which would have negative design consequences and would negatively impact the use and function of the community building to the west and the quality and enjoyment of the MOL and new accessible areas of the park which are proposed to the south.

Residential quality

81 London Plan Policy 3.5 and Policy D6 of the Mayor's Intend to Publish London Plan promote quality in new housing provision, with further standards and guidance set out in the Mayor's Housing SPG (2016). Minimum quantitative standards for private internal space, private outdoor space and floor to ceiling heights apply to all tenures and types of self-contained housing in Class C3 use within London. In addition, residential and mixed use developments should maximise the provision of dual aspect units and normally avoid single aspect units that are north facing or exposed to significant adverse noise impacts. The 2016 Housing SPG also sets out benchmark unit per core per floor ratios.

82 As the scheme is in outline format, only limited illustrative information is available at this stage in relation to these requirements. The illustrative layouts do suggest a number of north-facing single aspect units are expected at the Rockhills site which should be minimised. Should the Council grant planning permission, conditions should be included in any decision notice to require subsequent detailed Reserved Matters Applications for housing proposed at the Rockhills and Sydenham Villas to comply with these minimum residential quality standards and minimise the provision of north facing single aspect units.

Density and optimising housing capacity

83 London Plan Policy 3.4 seeks to optimise housing density, with Policies D1 to D4 of the Mayor's Intend to Publish London Plan placing greater emphasis on a design-led approach to ensure development makes the best use of land, with consideration given to site context, public transport, walking and cycling accessibility and the capacity of surrounding infrastructure. In line with the GLA's pre-application advice, further design detail has been provided which demonstrates that the housing capacity has been optimised in line with the above policies, taking into account the site constraints.

Fire safety

84 In accordance with Policy D11 of the Mayor's Intend to Publish London Plan, the applicant must submit a fire safety statement as part of the planning application, produced by a third party suitably qualified assessor. This should demonstrate how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. A fire strategy is not listed within the application documents and cannot be located within the planning submission and further information is therefore requested in this regard.

Inclusive design

85 London Plan Policy 7.2 and Policy D5 of the Mayor's Intend to Publish London Plan seek to ensure that new development achieves the highest standards of accessible and inclusive design. Appropriate conditions are required to ensure that detailed elements of the proposed scheme accord with the inclusive design principles set out in the above policies. This should ensure the park and associated facilities can be entered and used safely, easily and with dignity by all; is convenient and welcoming; and, provides independent access without additional undue effort, separation or special treatment. Policy 3.8 of the London Plan and Policy D5 of the Mayor's Intend to Publish London Plan require that at least 10% of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' (designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users); and all other new build dwellings must meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. These should be distributed across tenure types and sizes to give disabled and older people similar choices to non-disabled. Should the Council resolve to grant planning permission, compliance with Policy 3.8 and Policy D5 of the Mayor's Intend to publish London Plan should be secured by condition, with further information and design details provided at Reserved Matters Stage.

Heritage

86 London Plan Policy 7.8. and Policy HC1 of the Mayor's Intend to Publish London Plan state that development should conserve heritage assets and avoid harm. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should "*have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*". In relation to conservation areas, special attention should be paid to the desirability of preserving or enhancing the character of conservation areas when making planning decisions.

87 The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

88 As set out in Planning Practice Guidance, public benefits which follow from development could be anything that delivers economic, social or environmental progress as described in the NPPF and may include heritage benefits¹. In relation to enabling development and heritage assets, paragraph 202 of the NPPF states that local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

89 The outline scheme proposes the restoration, repair and enhancement of the setting and overall significance of the following designated heritage assets which are on the Heritage at Risk Register:

- the Grade I listed dinosaurs;
- the Grade II* Crystal Palace Pedestrian Subway;
- the Grade II listed Upper and Lower Terrace; and
- Grade II listed north and south railings, walls and boundary marker at Crystal Palace Park Parade.

¹ MHCLG; Planning Practice Guidance; Paragraph: 020 Reference ID: 18a-020-20190723

90 In addition, the Grade II listed bust of Sir Joseph Paxton would be relocated and its setting significantly improved. The significance of the Grade II* Crystal Palace Park as a whole would be significantly enhanced as a result of these restoration and re-landscaping works, ensuring that the key heritage features can be better appreciated by current and future generations; improving their setting; and also by addressing the urgent need for structural repairs and restoration to key heritage assets which are in a state of disrepair. Collectively, these elements of the scheme constitute significant heritage related public benefits should they be successfully delivered.

91 Development on the edges of the park at Sydenham Gate, Rockhills, Anerley Hill and the existing Capel Manor farm site and the proposed cultural venue would affect the setting of the Grade II* listed park as well as the character and appearance of the Crystal Palace Conservation Area which would harm these two heritage assets albeit, taking into account the existing and proposed context and the applicant's TVIA, the harm caused would be relatively spatially and visually limited. The level of harm would be less than substantial and, taking into account the significance of the heritage assets in question and the statutory and planning policy tests set out above, GLA officers consider that this less than substantial harm could be clearly and convincingly outweighed by the significant heritage related public benefits the application envisages.

Climate change

Energy

92 Whilst the outline nature of the application means that a number of key details are not available at this stage, the applicant's energy statement includes a commitment to achieve a 35% CO₂ reduction on-site on both the domestic and non-domestic elements of the scheme, with energy efficiency measures accounting for 10% and 15% of the required reductions in CO₂ emissions. This generally complies with the minimum on-site targets in the Mayor's Intend to Publish London Plan and is supported. The applicant should clarify whether the CO₂ emissions reductions have been calculated using SAP 2012 or SAP 10 emission factors; use of the latter is strongly encouraged. Renewable energy generation is proposed in the form of Photovoltaic (PV) panels equating to approximately 820 sq.m. of roof area. Air Source Heat Pumps (ASHP) are also proposed, which is supported.

93 Should the application be approved, subsequent Reserved Matters Applications should be required to submit more detailed information in terms of energy efficiency and overheating assessments, in line with GLA guidance. Further details of the specification and performance of the ASHPs should be provided at Reserved Matters stage, as well as commitment to future proof elements of the scheme to allow for a connection to a district heat network should one be provided in the future. Any further shortfall in CO₂ savings should be mitigated via carbon offset payments and secured in any Section 106 agreement.

Flood risk and sustainable urban drainage

94 The site is in Flood Zone 1 and the surface water flood risk is generally low, although there are medium and high risk areas. However, there are drainage issues across the park, particularly on pedestrian pathways around the lower lakes. The surface water drainage strategy provides an assessment of the existing runoff rates and the attenuation storage required to restrict the 100 year (plus 40% climate change) post-development discharge rate for new impervious areas to Greenfield rate. The discharge rates for existing impervious areas would be reduced by 50% from existing situation. The drainage strategy proposes a range of Sustainable urban drainage (SuDs) measures, in line with the London Plan drainage hierarchy. This would make use two attenuation ponds, but also include rain gardens, swales and the use of storage attenuation tanks where necessary, for example, with parking areas incorporating permeable paving and attenuation tanks to control run-off rates. Of the total attenuation volume required (7,850 cubic metres), the majority would be met by the two existing ponds (approximately 60%), with storage tanks provided to address the remaining capacity required. This overall approach is supported. Further detailed drainage strategies (both site wide and by phase) should be submitted and approved.

Urban greening

95 An Urban Greening Factor (UGF) assessment has been undertaken which demonstrates that the proposed scheme would generate a site wide UGF score of 0.47. This would comprise many existing features including the ponds, woodland areas and amenity grasslands but also takes into account new areas of amenity grassland and flower rich perennial planting proposed, for example where the existing central car park would be removed and replaced by lawns and perennial planting areas. Planting improvements are also proposed on the Upper Italian Terraces and within the caravan club site. This overall site wide strategy is acceptable and would accord with the London Plan and Intend to Publish London Plan. Should the application be approved, more detailed urban greening assessments and proposals for residential and educational elements should be required for RMAs and the proposed urban greening proposals secured by condition. Conditions would also be required to require full details of the proposed landscaping improvements and approve works to existing landscapes and trees.

Transport

Public park car parking and non-residential uses

96 In line with Policy T1 of the Mayor's Intend to Publish London Plan, developments within London should support a modal shift, with the Mayor setting an overall target of 80% of journeys to be made by walking, cycling and public transport. To support this, outer London is expected to have a sustainable mode share of 75% and 90% in inner London.

97 At present, the red line application boundary contains 485 existing car parking spaces and 11 coach parking spaces. There are currently no car parking charges for these spaces. In addition to this, there are a further 222 of car parking spaces located within the National Sports Centre site which would be unaffected by the outline planning application as they are not within the applicant's control or the red line application boundary. The amendments to the parking proposed by the application would reduce the parking within the park that is within the red line application boundary to 146 spaces and 10 coach parking spaces. This represents an overall net reduction of 339 car parking spaces and 1 coach parking space. In addition to this, two areas of 'transitional landscape' are proposed which would accommodate temporary events car parking for an additional 565 vehicles.

98 The applicant has undertaken car parking utilisation studies during typical event and non-event days during the week and weekend days. This study has looked at the usage of the existing car parking within both the site boundary and the NSC site and identifies that on a typical weekday, the maximum parking utilisations range from 37% to 45% of spaces available, with event day usage ranging from 47% to 118% of spaces available.

99 Whilst the overall net reduction in car parking within the park is welcomed, the proposed quantum of general parking would not assist in achieving the above modal shift objectives for park users, nor is it reflective of car ownership and usage rates in the surrounding area, much of which is inner London, with the proposed levels higher than the applicant's occupancy study on typical weekend non-event days. Furthermore, in the absence of parking controls and charges, a portion of this parking is and will be by commuters using the nearby stations. Therefore, a further significant reduction is required along with parking management measures to discourage commuters and charging to better reflect the true cost of car use instead of sustainable transport and active travel. As advised at pre-application stage, the event parking is contrary to policy to support sustainable and active travel and limit car use. Justification for the event car parking provision and a more detailed assessment of the potential transport impact has not been provided, and if any event parking is accepted, appropriate controls on the frequency and type of use and suitable management and charging would be required.

100 Whilst there would be an overall net reduction in car parking serving the college, the scheme proposes 4 standard car parking spaces at Anerley Hill, which is within PTAL 6. This does not comply with the Intend to Publish London Plan. Further information is requested to justify the operational need for these spaces in this location, given the PTAL.

Residential car parking

101 In terms of the residential development, 140 residential units and 84 car parking spaces are proposed at Rockhills, of which 10 would be disabled car parking spaces. At Sydenham Villas, 70 residential units are proposed with 43 car parking space, of which 4 spaces would be disabled car parking spaces. This represents a car parking ratio of 0.6 in both instances. Both locations are within PTAL 3 in Outer London. The car parking provision is therefore below the maximum residential car parking standard (0.75) set out in Table 10.3 of the Mayor's Intend to Publish London Plan. Notwithstanding this, as set out under the urban design section of this report, having regard to the applicant's parameter plans and illustrative designs, GLA officers are concerned that the proposals at Rockhills would result in a large area of MOL being utilised for surface car parking, which should be reduced. On both sites the applicant is strongly encouraged to reduce the proposed residential parking levels, given the site locations which are close to inner London and benefit from relatively good public transport access levels.

102 Disabled parking provision would comprise 7% at Rockhills and 6% at Sydenham Villas from the outset. This exceeds the minimum requirements set out in Policy T6.1 of the Mayor's Intend to Publish London Plan, which requires disabled car parking provision for 3% of residential units from the outset and the demonstration that capacity exists for the remaining 7%. In accordance with Policy T6.1, a Parking Design & Management Plan should be secured through condition, detailing how a total of 10 per cent of residential dwellings could be provided with access to a disabled person's parking space should demand arise and to regulate the use and allocation of disabled parking spaces only by those holding Blue Badges.

Electric vehicle charging facilities

103 In line with Policy T6 of the Mayor's Intend to Publish London Plan, at least 20 per cent of residential car parking spaces should have active electric vehicle charging facilities with passive provision for all others. The residential element of the scheme would comply with this requirement. However, in addition to this, adequate electric charging facilities should also be provided for those driving to the park, including some rapid charging.

Controlled Parking (CPZ)

104 To control temporary events, park visitor and on street parking around the site, a contribution towards the extension of the area and/or operating hours of the CPZs outside the park is sought. In addition, CPZ permit free provisions for new residents and staff should be secured.

Residential cycle parking

105 In total, 380 long stay and 26 short-stay residential cycle parking spaces are proposed. 8 more long-stay cycle parking spaces are required to comply with the minimum standards set out in the Mayor's Intend to Publish London Plan.

Non-residential cycle parking

106 An additional 54 cycle parking spaces are proposed within the park, increasing total provision to 207. Whilst this increase is welcomed, the provision compares unfavourably with car parking (368 spaces) and the basis for this figure should be clarified. As a minimum, suitable places should be identified and safeguarded for extra cycle parking to meet demand. The distribution of cycle parking across the park is broadly supported, however further detail should be provided to confirm their exact locations, in particular those close to Crystal Palace rail station and vehicular and cyclist entrances. All cycle parking should be secured by condition including details to comply with the London Cycle Design Standards (LCDS) in line with Policy T5 of the Mayor's Intend to Publish London Plan. Given that many children visit the Park, more cycle parking suitable for smaller and trailer bikes should be provided. Consideration should also be given to a cycle hire scheme, including for disabled people, for trips within the park as well as to and from it.

Public transport highways impact

107 Based on the applicant's Transport Assessment (TA), it is considered that the impact of the proposed permanent uses will have minimal impact on the transport network. In terms of the temporary events proposed, further information should be provided. It is acknowledged that the applicant is only seeking to increase the frequency. However, a 'worse-case scenario' assessment should be undertaken to determine the impact on the public transport and highway network to assist in identifying appropriate management and mitigation measures and to enable significantly increased active and sustainable travel compared to the existing situation. A conditioned Events Management Plan should cover this matter with mitigation secured by condition or legal agreement as appropriate.

Impacts on bus operations

108 Further discussion with TfL is required to confirm that the proposed development and quantum of residential and non-residential car parking would not impact bus operations, taking into account the existing bus access and waiting arrangements within the Crystal Palace bus station and along Crystal Palace Parade. The proposals appear to require access off/on bus lane on Crystal Palace Parade. This requires further consideration and discussion given the number of buses that are stopping and standing in this lane.

Possible Tramlink extension to Crystal Palace

109 Although TfL is not currently pursuing this project and it is not identified within the Mayor's Intend to Publish London Plan or the Mayor's Transport Strategy (MTS), the proposed development could constrain any extension of the Tramlink to Crystal Palace. This potential spur would link into existing tram services from Beckenham towards Croydon. Bromley's Local Plan (2019) commits the Council to safeguard land and route alignments for the extension, but does not identify any specific land or alignment. As such, TfL and the Council will need to carefully consider the potential implications of the application development on the tram extension proposal before the application is referred back to the Mayor at Stage 2.

Pedestrian and cycle routes and park entrances

110 The applicant has undertaken an Active Travel Zone (ATZ) assessment, which is welcomed. Key mitigation measures and qualitative enhancement measures to facilitate sustainable and active travel to and from the site and to address identified accident clusters especially those with vulnerable users should be identified and secured, working with Bromley Council and the adjacent boroughs. New and improved walking and cycling routes are proposed which is strongly supported, the delivery of which would need to be secured via S106. Where a route is suitable for both pedestrian and cyclists, this should be designed to accord with the LCDS. Walking and cycling routes through the residential development should be created to further improve permeability, with their delivery secured through the appropriate mechanism. Further information on proposed wayfinding should also be provided. Modifications to the four main vehicle access points to the Park are proposed. Significant improvements are required to support the Healthy Streets approach in line with the Mayor's Intend to Publish London Plan.

Deliveries, servicing, construction and travel plans

111 A Framework Delivery and Servicing Plan (DSP) has been submitted; however, further needs much more detail for each land use and the proposed temporary events. Swept path analysis indicates that some vehicle movement would be contrary to Vision Zero policy and this requires revision. A new loading bay, which also incorporates a disabled persons' parking space, on Crystal Palace Parade is proposed for the cultural venue. As raised at pre-application stage, there are concerns about its impact on adjacent bus operations and its effective management which requires further discussion. A full Delivery and Servicing Plan and Construction Logistics Plan should be secured, along with a full Travel Plan for each use including temporary events to deliver the Mayor's strategic mode shift targets

Local planning authority's position

112 Bromley Council planning officers are reviewing the scheme and do not yet have a committee date identified.

Legal considerations

113 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

114 There are no financial considerations at this stage.

Conclusion

115 The policies of the London Plan and the Mayor's Intend to Publish London Plan policies on Metropolitan Open Land (MOL); visitor infrastructure; social and healthcare infrastructure; housing and affordable housing; play space; urban design; heritage; energy; flood risk and drainage; urban greening and transport are relevant to this application. The following strategic planning issues should be addressed to ensure compliance with the London Plan and the Mayor's intend to publish London Plan:

- **Principle of development:** The application proposes inappropriate development on Metropolitan Open Land (MOL) which would cause harm to openness. Very special circumstances have not been demonstrated which would clearly outweigh this harm. As such, the application is contrary to the NPPF and London Plan. Harm caused by the loss of the specialist caravan site facility could be outweighed by the range of public benefits proposed, but the applicant should extend the area it has looked at for a new campsite to adjoining boroughs. Further discussion is required in relation to social infrastructure facilities
- **Housing and affordable housing:** No affordable housing is proposed on public sector land which is subject to a 50% threshold for affordable housing. Affordable housing is required and prior to Stage 2, the applicant must set out all available options to provide affordable housing, including through grant funding, different options in term of tenure mix and by providing affordable housing off-site or via a cash in lieu contribution. Early and late stage viability review mechanisms would be required within any approval. Further discussion is required in relation to play space.
- **Urban design:** The potential improvements to the park the scheme sets out in relation to landscape, heritage, access and recreation are strongly supported and the overall design strategy underpinning the regeneration plan is supported. GLA officers are content that the application proposals are capable of being successfully integrated with the emerging proposals for the National Sports Centre site to ensure the coherent overall regeneration of the entire park. Residential quality and inclusive design standards should be secured by condition.
- **Heritage:** The significant heritage related public benefits associated with the restoration and repair of designated heritage assets on the at Risk Register could outweigh the less than substantial harm caused to the setting of the Grade II* listed park and Crystal Palace Conservation Area arising from the proposed development on the edges of the park.

- **Energy:** The energy strategy is acceptable, subject to further information being provided. Should the application be approved, subsequent Reserved Matters Applications should be required to submit more detailed information in terms of energy efficiency and overheating assessments, in line with GLA guidance. Further details of the specification and performance of the ASHPs should be provided at Reserved Matters stage, as well as commitment to future proof elements of the scheme to allow for a connection to a district heat network should one be provided in the future. Any further shortfall in CO2 savings should be mitigated via carbon offset payments and secured in any Section 106 agreement.
- **Flood risk and drainage:** This overall approach to incorporate SuDs is supported and complies with the London Plan drainage hierarchy. Further detailed drainage strategies should be submitted and approved.
- **Urban greening:** The overall site wide strategy and urban greening factor assessment is acceptable and would accord with the London Plan and Intend to Publish London Plan. Should the application be approved, more detailed urban greening assessments and proposals for residential and educational elements should be required for RMAs and the proposed urban greening proposals secured by condition. Conditions would also be required to require full details of the proposed landscaping improvements and approve works to existing landscapes and trees.
- **Transport:** Whilst the overall net reduction of 339 public car parking spaces within the park is welcomed, a further significant reduction is required in line with the Mayor's transport objectives to reduce car journeys and promote active and sustainable travel. Parking management measures and charges are required to discourage the use of public parking by commuters using nearby stations and from visitors to the park and events. Justification is required for the temporary event car parking, which will require appropriate management controls. Further detail is required in relation to the events to determine the associated transport impacts. An Events Management Plan is required which should identify appropriate management and mitigation measures and to enable significantly increased active and sustainable travel compared to the existing situation. This should be secured by condition or S106 agreement. Further discussion with TfL is required to confirm that the proposed quantum of residential and non-residential car parking would not impact bus operations and justify the operational need for car parking at Anerley Hill. Walking and cycling improvements should be secured by condition/s106 obligation. Given the existing transport safeguarding, TfL and the Council will need to further consider the potential implications of the application on the Tramlink extension before the application is referred back to the Mayor at Stage 2. The following standard conditions are required: a Parking Design & Management Plan; provision of electric vehicle charging facilities; cycle parking provision and its design in accordance with the London Cycling Design Standards; a Delivery and Servicing Plan; Construction Logistics Plan; and Travel Plan.

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