

Committee Date	6 th June 2024	
Address	Crystal Palace Park Thicket Road Penge London SE20 8DT	
Application number	24/00478/DET	Officer: Joanna Wu
Ward	Crystal Palace & Anerley	
Proposal (Summary)	Details of reserved matters (appearance, landscape, access, layout and scale) for Sites A and B, Phase 1A of the Crystal Palace Park regeneration development, pursuant to Condition 1 of outline planning permission DC/20/00325/OUT, for the demolition of Ranger's Lodge and Information Centre and the construction of a new Information Centre and Rangers Maintenance Building, the conservation and repair of heritage assets within the Geological Court of the Tidal Lakes and Dinosaurs, and Italian Terraces; relocation of the Paxton Bust; alterations to hard surfaces, ground levels and tree removal; landscaping enhancements including introduction of new trees and planting; accessibility improvements; provision and rearrangement of pedestrian paths/vehicular access routes, car and cycle parking and new gateway feature at Penge Gate; provision of new play space, new seating, lighting, wayfinding; drainage and ground works."	
Applicant	Agent	
London Borough of Bromley	Ms Sarah Eley, HTA	
Reason for referral to committee	Strategic application/Major development	Councillor call in No

RECOMMENDATION	APPROVAL OF DETAILS
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<p>KEY DESIGNATIONS</p> <ul style="list-style-type: none"> • Air Quality Management Area • Archaeological Priority Area • Crystal Palace Park Conservation Area • Green Chain • Historic Park and Garden (Grade II*)
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- Metropolitan Open Land (MOL)
- PTAL Level 1b-6a
- Renewal Areas
- Site of Importance for Nature Conservation
- Statutory Listed Buildings / Locally Listed Buildings
- Strategic Outer London Development Centre
- Views of Local Importance

Land use Details		
Use Class or Use description	Existing GIA area (to be demolished)	Proposed GIA area
Information centre (replacement)	193.8 sqm	193.8 sqm
Park maintenance building	--	300 sqm
TOTAL proposed floorspace		300 sqm

Car Parking: Penge Gate			
	Existing	Proposed	Difference in spaces (+ or -)
Standard bays	31	15	-16
Accessible bays	2	4	+2
Active Electric (Enlarged)	0	2	+2
TOTAL	33	21	- 10

Cycle parking			
	Existing	Proposed	Difference in spaces (+ or -)
Maintenance Building/Depot	0	4	+4
Information centre	0	22	+22

Representation summary	<p>Neighbour letters were sent on 20th February 2024. The consultation was for a minimum of 21 days.</p> <ul style="list-style-type: none"> • On 29th February site notices were posted and on 23rd February a press advert was published notifying local residents that they could view and comment on the application on the Council's website.
Total number of responses	3
Number of neutral representations	2
Number in support	1
Number of objections	0

SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The proposals for Site A (Tidal Lakes and Maintenance Building/ Depot) and Site B (Italian Terraces) support the conservation of the heritage assets, including the restoration of the Dinosaur Statues, Geological Court and Italian Terraces, in a manner appropriate to their significance and would accord with the overarching 'sustainable development' principles of the NPPF.
- The new Information Centre and Maintenance Building are considered to be appropriate for Metropolitan Open Land. The only inappropriate development that could have potential harm to the MOL would be the new step-free ramp at the lower Italian Terrace. However, this proposal would give rise to a number of significant benefits, such as community benefits and access for all.
- The proposed landscaping works appear sympathetic to the original Park layout and the proposals will deliver publicly accessible green spaces. All of this would provide substantial public benefits and enhancements for visitors.

1. Background

- 1.1 An outline planning permission (planning ref: 20/00325/OUT) for the Crystal Palace Park Regeneration Plan was granted in March 2023, including the detailed highways access alterations at Anerley Hill Gate entrance, Penge Gate car park, Old Couple Lane (Rockhills Gate), Sydenham Gate car park and the creation of three additional accesses for the residential development at Rockhills and Sydenham Villas. Reserved matters relating to appearance, landscaping, internal access routes, layout and scale, within the application site as shown on Fig 1, have now been submitted for approval. A copy of the Decision Notice for this outline permission is attached in Appendix A.
- 1.2 The application site includes:
 - Site A (Tidal Lakes and the maintenance building/ depot) – formerly referred to as Area F: Tidal lakes and part Area G: Cricket Ground Area.
 - Site B (Italian Terraces) – formerly Area C: Italian Terrace. It is noted that in this application part of the Upper Italian Terrace has been excluded.
- 1.3 As stated in the outline permission, the highest priority restoration works are planned to take place in Phase 1A. In this application, the main restoration works include:
 - The Prehistoric Animal Sculptures;
 - The Upper and Lower Italian Terrace walls; and
 - The Bust of Sir Joseph Paxton.



Fig 1: Sites A and Site B of the Crystal Palace Park

- 1.4 Site A Tidal Lakes area is located on the southeastern part of the park and it includes the Geological Courts, Dinosaurs Sculptures and play area. The new maintenance depot building is located in a separate Site A plot to the north of the main Site A. Site B is located in the western part of the park where it includes the Italian Terraces.
- 1.5 Capel Manor College and the Crystal Palace Farm, which were previously included as part of Area F in the outline consent have now been excluded from Site A. It is envisaged that the details of any proposed works at Capel Manor College and the Farm will be subject to a separate planning application.
- 1.6 In order to facilitate these restoration works, three Listed Building Consent applications have been submitted for the proposed works at the Geological Courts and Animal Sculptures, Italian Terraces and the Bust of Sir Joseph Paxton. These applications are currently under review.
- 1.7 A non-material amendment to the outline consent (planning ref: 20/0325/AMD3) has been approved recently to allow changes to the approved size of the new information centre and the location of the new maintenance depot.
- 1.8 In addition, the applicants have also submitted applications to discharge the following site-wide conditions prior to the submission of this reserved matters application. These conditions set out the site-wide strategies for the park and

act as overarching strategies to facilitate the phasing of the proposed developments.

- Condition 3: Tree compensation strategy
- Condition 4: Park-wide Landscape Management Framework – for Area F (Tidal Lakes and Capel Manor Farm) and Area C (Italian Terraces)
- Condition 5: Arboricultural: a scheme for the protection of the retained trees
- Condition 6: Bat and Bird Surveys
- Condition 19: Pedestrian and Cycle Strategy – for Area F – exclude the Capel Manor Farm (Site A) and Area C (Site B) only

1.9 Three separate Listed Building Consent applications have also been submitted to set out the details for the heritage restoration works:

- Grade I listed Prehistoric Animal Sculptures and Geological Court,
- Grade II Italian Terraces, and
- Grade II listed Sir Joseph Paxton Bust

2. LOCATION AND SITE DESCRIPTION

Crystal Palace Park

- 2.1 Crystal Palace Park is a Grade II* listed park on Historic England's 'Register of Historic Parks and Gardens of special historic interest in England' and almost the whole park is designated as Metropolitan Open Land (MOL). It was once home to Sir Joseph Paxton's 'Crystal Palace', which, in its original form, housed the Great Exhibition of 1851 in Hyde Park. The park also included elaborate landscaping as well as water features and fountain designed by Sir Joseph Paxton.
- 2.2 The park shares its boundary with the London Boroughs of Lambeth, Croydon, Lewisham and Southwark for which it is also of strategic significance.
- 2.3 The Bromley Local Plan identifies Crystal Palace as a potential Strategic Outer London Development Centre (SOLDC) with specialist economic functions of more than sub-regional importance related to leisure, tourism, arts, culture and sports. The designation as a SOLDC represents the continuation of the aims of the Masterplan and the park itself represent opportunities to encourage growth of more than sub-regional importance beyond its boundaries, particularly in the Crystal Palace, Penge and Anerley Renewal Areas.
- 2.4 The Park contains a range of sporting, recreational, educational facilities and tourist attractions. It includes a number of Statutory Listed historic buildings and features. Notable attractions include Dinosaur Island: a collection of over 30 statues created by Benjamin Waterhouse Hawkins in the 1850s set within a model geological landscape in the Lower Tidal Lake (also used for boating); a children's playground; information centre; café; maze, concert platform; a rose garden; skate park; the upper and lower Palace Terraces and Italian

Terraces; the ornamental sphinxes; Crystal Palace Museum and Capel Manor College and urban farm.

- 2.5 The application site is within the *Crystal Palace Renewal Area*, one of five 'renewal areas' in Bromley, designated in response to London Plan Policy SD10 'Strategic and local regeneration'. Bromley's Renewal Areas include the areas most 'deprived' as evidenced by the 2015 English Indices of Deprivation (Bromley Local Plan).
- 2.6 The Park gates are open from 7:30am midweek and 9am on weekends and bank holidays, and are closed at sunset throughout the year. There is an extensive network of pedestrian and cycle routes within the Park which connect with local services and facilities and public transport. The park is included as part of the South East London Green Chain and includes strategic green chain and capital ring walks. The majority of the Park falls within the designated MOL is also designated as a Borough Grade I Site of Importance for Nature Conservation (SINC), though this designation excludes parts of the Park such as the caravan site, Palace Terrace, upper terrace and central car park.
- 2.7 Most of the Park area also falls within the Crystal Palace conservation area, managed through adopted Supplementary Planning Guidance (SPG). There are also a number of designated heritage assets adjacent to the site.
- 2.8 The view from the Upper Italian Terrace of Bromley, Beckenham and West Wickham is a view of Local Importance in the Bromley Local Plan and there are a number of important historic views within the Park.
- 2.9 The application site is divided into Site A (Tidal Lakes and new maintenance depot area) and Site B (Italian Terrace).

Site A (Tidal Lakes and new Maintenance Depot)

- 2.10 Site A has an area of 10.09 ha in total, including 9.84 ha in the southeastern part of the site and 0.25 ha for the new maintenance depot area. It is notable for its 29 Grade I (NHLE ref. number 1067798) listed prehistoric animal sculptures, popularly known as the Dinosaurs and the Grade II listed Guy the Gorilla statue (NHLE ref. number 1431362). These features are set within the man-made Tidal Lakes, which historically served as the source for the Park's water features. The lakes are bordered by Victorian geological displays, the Geological Courts, and are utilised for boating. Pathways and bridges around the lakes facilitate access and feature educational displays. Overlooking these lakes situated to the northern edge is the Crystal Palace Park Café. The Site also contains other community facilities such as an Information Centre and public toilets and is a well-used area of the Park.
- 2.11 Site A includes a section of the Grand Centre Walk which is a key feature within the Park connecting the grade II* listed NSC (National Sports Centre) to Penge Gate.

- 2.12 Penge Gate currently provides 33 car parking spaces and it is an essential access to the Park, connecting it to Penge, Penge West Station, and Thicket Road.
- 2.13 The new maintenance depot would be located to the northeastern part of the Park. In the original outline consent, the plan was to dismantle the existing depot and relocate it to the north, near the Ranger's Lodge to provide space to facilitate the future development of the Sydenham Villas residential area. In this current application, the existing depot will be retained on site (until a time that the Sydenham Villas residential development may be progressed) and a new maintenance depot will be constructed. The whole site falls within the Crystal Palace Park conservation area but part of this site falls outside the MOL and SINC area.

Site B (Italian Terraces)

- 2.14 Site B has an area of 7.38 ha and sits in the north-west of the Park. It features Grade II listed Italian Terraces, designed by Sir Joseph Paxton, a notable feature of the Park's landscape. The upper terrace was originally the Site of the Crystal Palace itself, with steps leading down to the Italian Terraces. These terraces are adorned with sculptures, some of which remain in place today, for example the Grade II listed sphinxes, which flank the steps between the terraces.
- 2.15 The Italian Terraces are situated at the highest point of the Park, near the Boundaries Gate and the bus terminal. They are a significant part of the Park's history and continue to be a focal point for visitors, offering a glimpse into the Park's rich heritage.
- 2.16 Site B is primarily accessed from within the Park by several integrated stepped access routes. The nearest gateways into the Park from Site B are from Anerley Hill Edge, the Bus Station on Crystal Palace Parade and from Crystal Palace Station.
- 2.17 The detailed programme and works for each area will be discussed in Section 3 below.

3. PROPOSAL

Overview of reserved matters application

- 3.1 The proposed works for this reserved matters application are summarised as follows:

Repair / restoration of heritage assets

- Grade I prehistoric dinosaurs and their associated geological features, lakes and islands
- Grade II Italian Terraces
- Restoration and relocation of Bust of Sir Joseph Paxton

New buildings/ structures

- New information centre
- New Maintenance Depot
- New dinosaur themed play areas within Tidal Lakes area
- Widening Grand Central Walk
- Step-free ramp at lower Italian Terraces

Landscaping proposals

- Landscape improvements including removal of clutter, redundant fencing, etc.; improvements to pedestrian routes; enhancement of habitat diversity; restoration of historic views; Paxton Axis and Grand Centre Walk; re-establishment of Parkland and associated landscape
- Installation of wayfinding signs and low energy lighting on footpaths; surface water drainage systems and benches
- Alteration to highways access at Penge Gate car park

Means of Access (within the Park)

- Improvements to highway, pedestrian and cycle access points throughout the Park
- Modification of public car parking area at Penge Gate

Demolition

- Existing information centre
- Ranger's Lodge (No. 33 Crystal Palace Park)

3.2 The detailed proposed works for Site A are summarised as follows:

- Renovation of the Grade I listed dinosaurs and their setting, including the Tidal Lakes, as outlined in the Historic England commissioned Sally Strachey report
- Creation of a vehicle entrance and exit gateway at Penge Gate car park which is separate from the pedestrian entrance.
- Renovation of Penge Gate car park to maximise usable area and include disabled parking bays, electric vehicle charging points and secure cycle parking.
- Creation of a pedestrian focused Gateway into the Park through Penge Gate.
- Creation of a new dinosaur themed play area visible from Crystal Palace Park Cafe and adjacent amenity space.
- Landscaping works
- Enhanced pedestrian and cycle routes
- Removal of excess vegetation
- Replacement of the existing Information Centre with a new Information Centre on the existing concrete foundation
- Demolition of the Rangers Lodge (No. 33 Crystal Palace Park Rd) and replacement with a new maintenance depot
- New cycle parking at the new Information Centre, Maintenance Depot, the new play area and the cafe



Fig 2: Site A - Proposed works

3.3 The detailed proposed works for Site B are:

- Conservation and repair of the Terrace walls and replacement of missing balustrades and copings to the Upper and Lower Italian Terraces.
- Repair of the North Wing Wall;
- Refurbishment of open grass area and drainage improvements on the lower Italian Terrace
- Relocation and mounting of the Bust of Paxton on a new plinth at its original location on the Lower Italian Terrace;
- Reforming grass to define southern end of Terraces.
- Installation of upper Italian Terrace sloped accessible route and embankment and lower Italian Terrace ramp
- Restoration of four statues
- Re-landscaping of open grass area and improved drainage to facilitate use for occasional events.
- Recreation of the layout of paths following a grid system
- Restoration of steps along Paxton Axis and along former line of northern and southern transept
- Introduction of ornamental tree specimens and groups in key locations.
- Landscaping works to improve site levels
- Removal of excess vegetation.



Fig 3: Stie B – proposed works

3.4 Most of the proposed works have already been approved in principle in the outline planning consent. However, some proposals have been revised as follows:

- Two substations currently located at Penge Gate would be retained at their current locations rather than be removed (Site A)
- More cycle parking spaces to be located at the new play area and café (Site A)
- Reduction in the number of accessible routes (ramps) at the lower Italian Terrace from two to one (Site B)

3.5 These proposed works will be discussed further in Section 5.

4. RELEVANT PLANNING HISTORY

4.1 In 2011, a Masterplan submitted by the London Development Agency (now the GLA) was granted Outline planning permission, Conservation Area Consent and Listed Building Consent by the Secretary of State. (refs: 07/03897/OUT, 07/03906/CAC and 07/03907/LBC). An Environment Impact Assessment (EIA) was undertaken for this scheme. The Environmental Statement, including a suite of technical reports, was submitted with the planning application. However, the funds to deliver the £67 million scheme

were not identified at this point and this prevented this Scheme from being implemented.

- 4.2 The Masterplan (ref: 07/03897/OUT) included a museum, park maintenance facilities, children's nursery, cafes, information and retail kiosks, greenhouses, a treetop walk, a horticultural and animal husbandry training college, removal of the caravan site, as well as the development of 180 homes around the perimeter of the Park as 'enabling development' for the restoration of the Park and structures therein.
- 4.3 In May 2012, planning permission was granted for use of buildings, storage container and adjacent land for horticulture and arboricultural training (ref: 12/00318/FULL2).
- 4.4 In November 2015, listed building consent was granted for conservation works to the dinosaur sculptures, to include cleaning, repair and associated works (ref:15/02847/LBC).
- 4.5 In November 2015, listed building consent was granted for repairs to the granite steps and sphinxes to include repainting of the statues (ref: 15/04121/LBC)
- 4.6 In November 2015, planning permission was granted for demolition of the existing single storey cafe and terrace and erection of a two storey building comprising cafe on ground floor and cafe/ event space on first floor; external ground and first floor terraces and construction of a connecting bridge from the first floor terrace to the lakeside path (ref: 15/03106/FULL1).
- 4.7 In September 2016, permission was granted for the proposed formation of a skatepark (outdoor wheeled sports area) with associated landscaping/ excavation/ regrading works on land adjacent to sports pitches (ref: 16/02679/FULL1)
- 4.8 In November 2017, the Council issued a Screening Opinion pursuant to Regulation 5 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in respect of an application for the Comprehensive phased scheme for landscaping including planting of new trees and improvements to the Crystal Palace Park comprising the dismantling and refurbishment of, alterations to, and demolition of existing buildings and structures (ref: 17/04985/EIA).
- 4.9 In March 2018, the Council issued a Scoping Opinion confirming which topics should be included in the Environmental Statement to accompany any planning application and which topics could be 'scoped-out' (ref: 18/00352/EIA).
- 4.10 In November 2019, planning permission was granted construction of a footbridge in Crystal Palace Park for access to the Crystal Palace Dinosaurs on Dinosaur Island (ref: 19/03578/FULL1)

- 4.11 In October 2020, a reserved matters application was received for Details of layout pursuant to outline permission DC/07/03897/OUT granted by the Secretary of State on 13th December 2010 for a comprehensive phased scheme for landscaping and improvement of the Park.
- 4.12 In March 2023, outline planning permission with all matters reserved except highways access for comprehensive phased regeneration of Crystal Palace Park was granted. This application included: the conservation and repair of heritage assets; removal of existing hard surfaces; alterations to ground levels and tree removal; landscaping including planting of new trees; demolition of existing buildings and structures; creation of new pedestrian paths/vehicular access roads / car, coach and cycle parking; changes of use including part of the caravan site to part public open space and part residential; erection of new buildings and structures comprising: up to 2300sqm for a cultural venue (Use Class D2), up to 530sqm of park maintenance facilities (Sui Generis) including the dismantling and reconstruction of existing maintenance depot; up to 150sqm information centre (Use Class D1); up to 670sqm for a community centre (Use Class D1); up to 3779sqm of educational institution at the Capel Manor College Farm Site (Use Class D1) of which 3399sqm comprises educational buildings and 380sqm comprises ancillary shelters/outbuildings; and up to 16,352 sqm of residential (Use Class C3) accommodation to provide up to 210 residential dwellings, together with associated and ancillary works including utilities and surface water drainage, plant and equipment. Full planning permission is sought for alteration to highways access at Anerley Hill Gate entrance, Penge Gate car park, Old Cople Lane (Rockhills Gate), Sydenham Gate car park and the creation of three additional accesses for the residential development at Rockhills and Sydenham Villas. (ref: 20/00325/OUT).
- 4.13 In November 2023, planning permission was granted for changing facilities for users of the park with severe disabilities at land adjacent to the Crystal Palace Park Café (ref: 23/03026/FULL1).
- 4.14 In April 2024, a non-material amendment application (ref: 23/03025/AMD3) was granted for the amendment to the development description of permission ref: 20/00325/OUT to remove the reference to “the dismantling and relocation of the Maintenance Depot” and to the approved maximum size of the Information Centre, i.e. “up to 150sqm” and the replacement of approved plans set out in condition 2.
- 4.15 In February 2024, five site-wide pre-reserved matters discharge of condition applications were submitted and are pending approval at the time of writing. The relevant conditions are: Condition 3 – Planting Compensation Strategy (ref: 20/00325/CONDIT); Condition 4 – The Framework Landscaping Plan and Landscape Management Plan (ref: 20/00325/CONDT1); Condition 19 – Pedestrian and Cycle Strategy (ref: 20/00325/CONDT2); Condition 6 – Ecology Surveys (ref: 20/00325/CONDT3) and Condition 5 – Tree Protection Plan, Arboricultural method Statement) for Phase 1A Site A and Site B only (ref: 20/00325/CONDT4).

- 4.16 In March 2024, three Listed Building Consent applications were submitted and are pending approval at the time of writing. The relevant applications are: (Planning ref: 24/00929/LBC) for proposed works to the Grade I listed Prehistoric Animal Sculptures and Geological Court; (Planning ref: 24/00936/LBC) for proposed works to the Grade II listed Sir Joseph Paxton Bust and (Planning ref: 24/00935/LBC) for proposed works to the Grade II Italian Terraces.

5. CONSULTATION SUMMARY

a) Statutory:

5.1 Greater London Archaeological Advisory Service – No objection

5.2 Transport for London – No objection

- The creation of a vehicle entrance and exit gateway into Penge Gate car park which is separate from the pedestrian entrance is supported as is the reduction in vehicles accesses on Thicket Road and replacement with landscaping and removal of the dropped kerb/crossover of the footway and reinstatement of a level route. I assume these works and others on the public highway will be undertaken by a s278 agreement.
- Whilst renovation of this car park to include disabled bays, electrical charging points and secure cycle parking is welcomed, please satisfy yourselves that the general car parking proposed which whilst acknowledged as being less than existing is the minimum necessary to support the activities and uses of this part of Crystal Palace Park. There should be a management scheme in place for the car park, including charging, to deter use by commuters, local residents and others not visiting the park and to encourage sustainable and active travel by the latter.
- The ‘pedestrian-centric’ approach to the design is also welcomed. However, further consideration and detail is needed as to the provision for cyclists and cycling to encourage the full range of active travel by all people to, from and within the park be they staff or visitors or just passing through.
- It is welcomed that a large monolith sign is proposed at the new Penge Gate Entrance with finger Posts and mini-posts to be installed at key junctions within this part of the park. It is assumed these will be Legible London signage. Colleagues at TfL will be pleased to discuss further the details of this signage and arrangements for installation.
- To achieve the proposed separation of pedestrians and cyclists from that for vehicles off Thicket Road suitable signage will be required directing them to their own dedicated access and away from the proposed combined car park entry and exit. Consideration is also needed as to how best to manage the shared use by pedestrians and cyclists to ensure safety, comfort and convenience of all.
- The proposed provision of contractor car parking during the works is contrary to London Plan policy and should be removed for all but disabled workers. Instead contractors should use public transport – Penge West station is nearby as are a number of bus services – and active travel. In respect of the latter cyclist facilities should be provided.

- 5.3 Historic England – In support on heritage grounds
- A copy of the comments is attached in Appendix B.
- 5.4 Sport England - No objection
- 5.5 Highways – No objection
- Comments are referenced in section 7.6 of this report
- 5.6 Drainage (Lead local flood authority) – No objection
- 5.7 Natural England - No objection
- Refer to general advice
- 5.8 The Garden Trust – No objection
- 5.9 Network Rail – Neutral
- Refer to the Asset Protection informatives

b) Non-Statutory / Amenity Groups

- 5.10 Thames Water – No comments
- 5.11 Environmental Health – No comments
- 5.12 Secure by Design Officer - No objection
- Short term advice: Planting next to a footpath should be arranged with the lowest-growing specimens adjacent to the path.
 - Medium term advice:
 - Paths - can be colour-coded to give them their own identities; better quality lighting such as LED lights;
 - The paths should have clear sight lines and no obstruction of the lighting.
 - Other areas of the park can keep their trees and limited lighting so that the wildlife is not massively affected.
 - Signage can have different functions, such as stating the distance, indicating directions, indicating expected behaviours and also warning users of potential dangers. The signs can also be used to inform visitors that CCTV is present in the area.
- 5.13 London Fire Brigade – consulted and did not comment
- 5.14 Orpington Field Club and Bromley Biodiversity Partnership sub-group – Concerns raised:
- There appears to be more native trees included in the planting lists, although there may be scope to include more native species. For example in the north west corner of Site B, several crab apple trees are to be planted, but rather than use a native British variety, one that is native to China has been suggested.

- It appears that there is no reference to bat hibernation surveys being conducted for the lead mine area (Area 11 of the proposed repairs area).
- Finally, there are concerns on the bat foraging corridors that may be interrupted during the works. It would be ideal if the works could be phased so that bat foraging and commuting is not overly disturbed.

5.15 Friends of Crystal Palace Dinosaurs – In support

- Other comments and concerns include:
 - It is considered that the proposals in this application are brief and do not appear to have been sufficiently informed by detailed study of the Sally Strachey Historic Conservation (SSHC) reports and maintenance plans. It is suggested that the recommendations in the Maintenance Plan drafted by The Morton Co. in approximately 2021 should also be included in current plans.
 - New information centre - The plans show many competing uses for the space. The large open room will be a hire-space for classes and events (these are already provisioned elsewhere in the Park and local community, e.g., café, sports centre, CP Museum, new CP Subway, Concert Platform, Capel Manor, local facilities).
 - no facility for archival storage of loose assets from the site, as advised by Historic England. It is critical that this is accommodated in a way that is accessible to users of the collections for interpretation and research.

(The response from the applicants to these issues are attached in Appendix C)

5.16 The Victorian Society – In support

- A sensitive planting scheme should be implemented to place the sculptures in their proper setting and enhance their significance as fully as possible.
- Little detail is provided for the visual impact of the play area. It is concerning that the various examples of other similar play areas shown in the Design and Access Statement are of a scale and prominence that would be unsuitable here. Developed proposals must be more sensitive to their surroundings.

5.17 Woodland Trust – consulted and did not comment

c) Adjoining Local Authorities:

5.18 **LB Croydon – consulted and did not comment**

5.19 **LB Lambeth – consulted and did not comment**

5.20 **LB Lewisham – No objection**

5.21 **LB Southwark – In support**

d) Adjoining Occupiers:

Support

- It was delighted to see the regeneration plan for the park which has fallen into disrepair and provide upgraded facilities for local residents
- Plans are thoughtful, including step free access to the park which is currently limited
- Encourages wildlife to flourish with the introduction of wild flowers

Comments

- There is the need for scrupulous ecological checks to be carried out on those trees earmarked for removal;
- They should provide roosting/ breeding sites for owls, woodpeckers or bats;
- Concerns on the loss of a Little Owl roost (within the grounds of Crystal Palace Sports Centre) that has been reported as a result of recent tree-felling at this location
- Rapidly declining species which have high legal protection.
- The neighbours are not convinced that the completed bird survey has recognised the full ornithological value of those trees that have already been lost and others that are under threat
- Request for a further, more rigorous and comprehensive assessment to be carried out on any trees that have been earmarked for removal and keep as many trees as possible.

6. POLICIES AND GUIDANCE

6.1 National Planning Policy Framework (NPPF) 2024

6.2 National Planning Practise Guidance (NPPG)

6.3 The London Plan (2021) policies relevant to this application:

SD1 Opportunity Areas

SD2 Collaboration in the Wider South East

SD7 Town centres: development principles and Development Plan Documents

SD10 Strategic and local regeneration

D1 London's form character and capacity for growth

D2 Infrastructure requirements for sustainable densities

D3 Optimising site capacity through the design-led approach

D4 Delivery good design

D5 Inclusive design

D8 Public realm

D11 Safety, security and resilience to emergency

D12 Fire safety

D13 Agent of Change

D14 Noise

S1 Developing London's social infrastructure

S2 Health and social care facilities

S3 Education and childcare facilities

S4 Play and informal recreation

S5	Sports and recreation facilities
S6	Public toilets
E10	Visitor infrastructure
E11	Skills and opportunities for all
HC1	Heritage conservation and growth
HC3	Strategic and Local Views
HC4	London View Management Framework
HC5	Supporting London's culture and creative industries
G1	Green infrastructure
G2	London's Green Belt
G3	Metropolitan Open Land
G4	Open space
G5	Urban greening
G6	Biodiversity and access to nature
G7	Trees and woodlands
G8	Food growing
G9	Geodiversity
SI1	Improving air quality
SI2	Minimising greenhouse gas emissions
SI3	Energy infrastructure
SI4	Managing heat risk
SI5	Water infrastructure
SI6	Digital connectivity infrastructure
SI7	Reducing waste and supporting the circular economy
SI8	Waste capacity and net waste self-sufficiency
SI12	Flood risk management
SI13	Sustainable drainage
T1	Strategic approach to transport
T2	Healthy Streets
T3	Transport capacity, connectivity and safeguarding
T4	Assessing and mitigating transport impacts
T5	Cycling
T6	Car parking
T6.5	Non-residential disabled persons parking
T7	Deliveries, servicing and construction
T9	Funding transport infrastructure through planning
DF1	Delivery of the Plan and Planning Obligations
M1	Monitoring

6.4 Mayor Supplementary Guidance

- Accessible London SPG (2014)
- Planning for Equality and Diversity in London SPG (2007)
- Optimising Site Capacity: A Design-led Approach LPG (2023)
- Public London Charter LPG (2021)
- Fire safety LPG (draft – June 2022)
- Play and Informal Recreation SPG (2011)
- Providing for Children and Young People's Play and Informal Recreation (2012)
- Social Infrastructure SPG (2015)

- London View Management Framework (2012)
- All London Green Grid (2012)
- London's Foundations (2012)
- Preparing Borough Tree and Woodland Strategies (2013)
- Urban greening factor LPG (February 2023)
- Air quality positive LPG
- Air quality neutral LPG
- Be Seen energy monitoring LPG
- Energy Planning Guidance
- The control of dust and emissions in construction SPG (2014)
- Sustainable Transport, Walking and Cycling
- Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy SPG
- Culture and Night-Time Economy (2017)
- Sustainable Design and Construction (2014)
- Character and Context (2014)

6.5 Bromley Local Plan 2019

5	Parking of commercial Vehicles
13	Renewal Areas
14	Development Affecting Renewal Areas
15	Crystal Palace Penge & Anerley Renewal Areas
20	Community Facilities
21	Opportunities for Community Facilities
22	Social Infrastructure in New Developments
24	Allotments and Leisure Gardens
26	Health and Wellbeing
27	Educational Facilities
30	Parking
32	Road Safety
33	Access for all
34	Highway Infrastructure provision
35	Transport Investment Priorities
36	Safeguarding land for transport investment
37	General Design of Development
38	Statutory Listed Buildings
39	Locally Listed Buildings
40	Other Non-Designated Heritage Assets
41	Conservation Areas
42	Development Adjacent to a Conservation Area
43	Trees in Conservation Areas
45	Historic Parks and Gardens
46	Ancient Monuments and Archaeology
48	Skyline
50	Metropolitan Open Land
51	Dwellings in the Green Belt or on Metropolitan Open Land
53	Land Adjoining Green Belt or Metropolitan Open Land
54	South East London Green Chain

57	Outdoor Recreation and Leisure
58	Outdoor Sport, Recreation and Play
59	Public Open Space Deficieincy
60	Public Rights of Way and Other Recreational Routes
69	Development and Nature Conservation Sites
70	Wildlife Features
72	Protected Species
73	Development and Trees
74	Conservation and Management of Trees and Woodlands
77	Landscape Quality and Character
78	Green Corridors
79	Biodiversity and Access to Nature
111	Crystal Palace Strategic Outer London Development Centre
113	Waste Management in New Development
115	Reducing Flood Risk
116	Sustainable Urban Drainage Systems
117	Water and Wastewater Infrastructure Capacity
118	Contaminated Land
119	Noise Pollution
120	Air Quality
122	Light Pollution
123	Sustainable Design and Construction
124	Carbon reduction, decentralised energy networks and renewable energy
125	Delivery and Implementation of the Local Plan

6.6 Bromley Supplementary Guidance

- Planning Obligations (2010) and subsequent addendums
- Urban Design Guide SPD (2023)
- Crystal Palace Conservation Area
- Bromley Biodiversity Plan (2021-2026)

7 ASSESSMENT

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

- Principle of development
- Design and Visual Impact
- Heritage Impacts
- Impact on neighbouring residential amenities
- Transport and Highways
- Green infrastructure and Natural Environment
- Energy and Sustainability
- Environmental Health - Air Quality, Noise & vibration and Land Contamination
- Flooding and Drainage
- Community Engagement
- S106 and CIL
- Other issues

7.2 Principle of development – Acceptable

- 7.2.1 London Plan Policy G3 affords Metropolitan Open Land (MOL) the strongest possible protection and says it should be protected from inappropriate development. Proposals that harm MOL should be refused. National Green Belt policies, set out within the NPPF, apply to MOL and therefore MOL is given the same protection as Green Belt.
- 7.2.2 Para 8.3.1 of Policy G3 states that “Metropolitan Open Land is strategic open land within the urban area. It plays an important role in London’s green infrastructure – the network of green spaces, features and places around and within urban areas. MOL protects and enhances the open environment and improves Londoners’ quality of life by providing localities which offer sporting and leisure use, heritage value, biodiversity, and health benefits through encouraging walking, running and other physical activity”.
- 7.2.3 Policy 50 of the Bromley Local Plan (BLP) is consistent with the London Plan. Policy 111 of the BLP states any proposals for the Crystal Palace Strategic Outer London Development Centre (SOLDC) will be subject to other policies in the Local Plan, notably Metropolitan Open Land policies and guidance related to the Crystal Palace Park Conservation Area and will be required to be consistent with the objectives identified as part of the approved masterplan for the Park.
- 7.2.4 As set out in paragraph 154 of the NPPF, the construction of new buildings should be regarded as inappropriate development in the Green Belt. Exceptions to this of relevance to the proposed redevelopment are:
- a) buildings for agriculture and forestry;
 - (b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
 - (c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
 - (d) the replacement of a building provided the new building is in the same use and not materially larger than the one it replaces; and
 - (g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
 - not have a greater impact on the openness of the Green Belt than the existing development; or
 - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to

meeting an identified affordable housing need within the area of the local planning authority.

7.2.5 Paragraph 155 states that certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These are:

- a) mineral extraction;
- b) engineering operations;
- c) local transport infrastructure which can demonstrate a requirement for a Green Belt location;
- d) the re-use of buildings provided that the buildings are of permanent and substantial construction;
- e) material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and
- f) development brought forward under a Community Right to Build Order or Neighbourhood Development Order.

7.2.6 The principle of whether the proposed developments would be appropriate or inappropriate developments in the MOL has been assessed as part of the outline planning application. In summary, the appropriate developments in this reserved matters application are:

- *Repairs to Heritage Assets (Sites A and B)*
- *New dinosaur themed play areas within Site A*
- *Replacement of Information Centre (Site A)*
- *New Maintenance Depot (Site A)*
- *Widening Grand Central Walk (Site A)*
- *Improvements to highway, pedestrian and cycle access paths throughout the Park and layout alteration of Penge Gate car parking area*
- *Upper Italian Terrace sloped accessible route and embankment*
- *Landscape improvements*
- *Earthworks – landscaping of the Italian Terraces*
- *Alterations to hard surfaces*

7.2.7 These developments would preserve the openness of the MOL and enhance the Park's functions. Therefore, these developments are considered to be acceptable in the MOL.

7.2.8 The following are considered inappropriate in the MOL as they do not meet any of the exceptions in paragraphs 154 or 155 of the NPPF:

- *Lower Italian Terraces ramp (Site B)*

In order to address the level difference between the ground level and the lower terrace, 2 step-free ramped routes were approved as part of the outline permission. Fig 4 shows that two ramps would be located at the lower Italian Terrace (locations highlighted in orange). In this reserved matters application,

only one ramp is proposed to the southwestern side of the lower Italian Terrace. The details of this structure are discussed in Section 7.3.21.

Given the size and footprint of the proposed ramp and also its prominent view from the Paxton Axis, this structure impacts on openness and would therefore be considered as inappropriate development. However, despite this officer's consider there are 'very special circumstances' which clearly and demonstrably outweigh the harm caused to the MOL (see below).

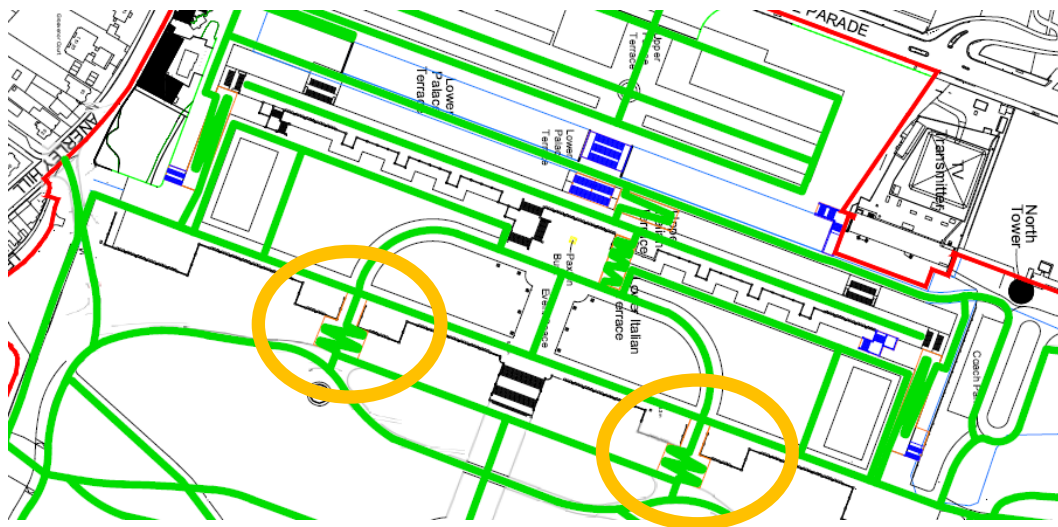


Fig 4: Step free, all weather surface route in green (approved in outline consent)

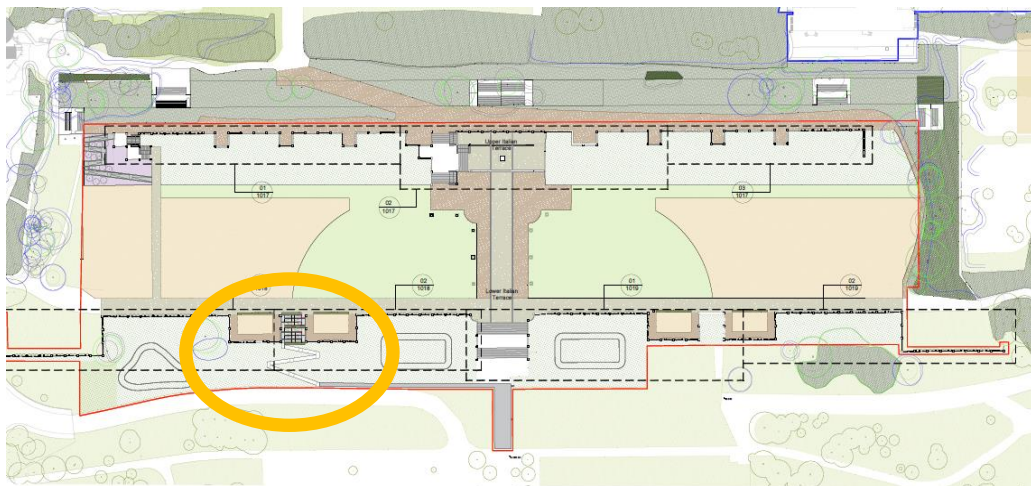


Fig 5: Site B – proposed Upper Italian sloped access route and lower Italian step-free ramp

Very Special circumstances – Access for all and Community benefits

7.2.9 Whilst it is noted that the planning statement does not set out the reasons for considering the ramp under “very special circumstances”, the applicants recommend that planting strips and integrated seating would minimise the visual intrusion of this structure.

7.2.10 In accordance with the requirements of Policy 33 (part a) 'Access for All' of the BLP, the proposed ramp structure would address issues on accessibility and legibility across the Park. Currently there is no step-free access from the ground level to the lower Italian Terrace and the inclusion of the ramp structure therefore serves to improve access to the Park. The overall proposal would increase the numbers of visitors to the site and it is considered that the community benefits provided by the improved step-free access weighs significantly in favour of the application. The recreational benefits of improving access and enhancing pedestrian and cycling connectivity throughout the Park were seen as significant public benefits of the application at outline stage, and these weighed heavily into the planning balance and in considering whether very special circumstances existed.

7.2.11 Therefore, it is considered that this structure is acceptable in this MOL location.

7.3 Design and Visual Impact – Acceptable

7.3.1 Policy 37 of the BLP states that developments proposals are expected to complement the scale, proportion, form, layout and materials of adjacent buildings and areas; positively contribute to the existing street scene and/or landscape; and respect important views, heritage assets, skylines, landmarks or landscape features.

7.3.2 The appearance, landscape, scale and layout are included in this reserved matters application. The applicants also provide the footprint and heights of the buildings, including the new Information Centre and Maintenance Depot.

Replacement of Information Centre (Site A)

7.3.3 The proposed Information Centre would be located at the same location as the existing one within Site A and it would be built on the existing concrete foundations. It would provide an enhanced education focus for the lower end of the Park as well as wider community Park interpretation and information facilities.

7.3.4 The proposed information centre would have a total floorspace of 194 sqm. Whilst it is noted that the proposed footprint of the new information centre would be larger than the approved information centre in the outline permission, i.e. "up to 150sqm", the size of new information centre would be similar to the existing information centre and would enhance the flexible use of the building, i.e. for both community, educational and visitors' use. The maximum building height of 4.5 metres is within the outline consent parameters. The benefits of retaining the existing concrete floor slab to reduce the embodied carbon of the proposed new building are acknowledged. The deviation from the footprint parameters approved in the outline consent in order to accommodate additional community facilities alongside Crystal Palace Park Trust requirements is broadly accepted.

7.3.5 The proposed finishing materials for this building would be of natural/ black vertical timber cladding. This design approach to create a lightweight timber framed structure with timber cladding to ensure that the building sits comfortably within the natural park setting is supported. The simple form and contemporary detailing of the building is considered to be appropriate for the site and the wider surroundings. The proposed landscape layout for the Information Centre which includes accessible access appears to be well considered.



Fig 6: Information Centre illustration

New Maintenance Building/Depot (Site A)

7.3.6 The new Maintenance Depot would be located partially outside of the MOL and on the edge of the Park on the site of the Ranger's Lodge at No. 33 Crystal Palace Park Road.

7.3.7 The principle of the new maintenance depot has been established and approved in the outline consent. The proposed footprint of this depot would fall within the maximum parameters approved in the outline consent. The proposed materials for this building would be in painted metal cladding and the building would be bounded by a 2m-high secure fence.

7.3.8 The Council's Urban Design officer has been consulted and considers that the preference for the proposed materials would be a timber clad finish as it would appear more in keeping with the park setting and less visually intrusive from Crystal Palace Park Rd and the adjacent Conservation area. The applicants state that the proposed metal finish would provide a good level of robustness, appropriate for its use. The "off the shelf" cladding finish can be fabricated off site and brought to site for its assembly and therefore, it will minimise the impact of construction on site. In addition, the applicants propose planted screening to this area of the site. The proposed material finish will be painted

in grey and it is extremely robust to cope with the uses as a maintenance depot and combat vandalism. On balance, these functional requirements are considered appropriate for the building's use and setting and therefore, the proposed materials are considered acceptable.



Fig 7: Maintenance Building illustration

Dinosaur-themed Play area (Site A)

7.3.9 A new play area would be located in the northwestern corner of Site A, opposite the existing play area. It will cater to children between 0 and 12 years old and includes a wide variety of equipment.. The key elements of the play area are:

- Imaginative excavation site theme, integrating geological strata and prehistoric elements.
- Dinosaur-themed play features, creatively interpreted for exploration and education.
- Play structures include slides shaped by 'claw marks', swings resembling dinosaur vertebrae, and a sandpit in the form of a dinosaur footprint.
- Equipment varies for different age groups, with challenging activities around the perimeter and central features for younger children.
- Accessible play opportunities are integrated throughout the area.
- Biodiverse sensory planting to support discovery of the natural environment and education on the evolution of plants.



Fig 8: Illustrative plan of proposed play area



Fig 9: Proposed play area illustration

Fig 9a: Proposed play area illustration



7.3.10 It is noted that the location of the new play space is in accordance with outline permission parameters but reconfigured to provide a more efficient arrangement than the existing with specific engaging dinosaur-themed play. The ongoing engagement with local community groups to co-design the play space is welcomed. The design concept and general arrangement outlined within the Design and Access Statement which includes inclusive play provision is supported.

7.3.11 The play area will be delivered in three phases and the existing play area will be retained until the new play space has been delivered in full. This approach has been developed to assist with prioritising restoration works to the Grade I and Grade II listed Structures within the Park. It is understood that workshops have taken place between the Design Teams of the application site and adjacent National Sports Centre site in order to safeguard a potential link between the respective public realm/play space proposals. The detailed design of the play equipment, along with the phasing arrangements and how these link to the wider park development and the NSC site, will need to be submitted to and approved by the Council as part of a planning condition.

- Phase 1 – 5-12 age play area; 0-5 age play area
- Phase 2 – 0-12 age play area
- Phase 3 – 0-5 age play area

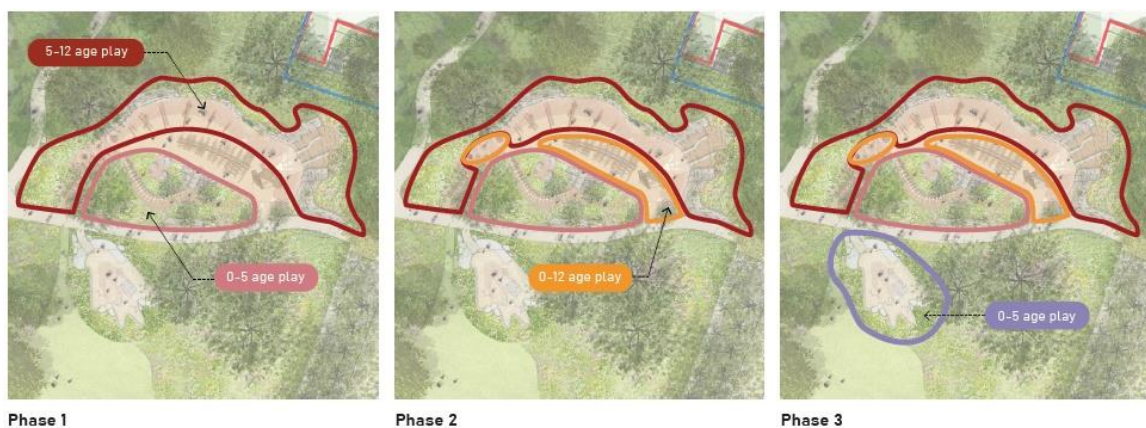


Fig 10: Play area proposed phasing plan

Penge Gate Entrance Gateway (Site A)

7.3.12 The current Penge Gate entrance to the Park is in poor condition. The gate is narrow for a key entrance to the Park and the surrounding walls to either side of the gate are mismatched and cracked in places. The opportunity to separate pedestrian and vehicle entrances to the park and improve the visual prominence of the pedestrian access point is welcomed.

7.3.13 The new entrance will be widened with a new feature gate marking the pedestrian Gateway from the south-east corner of the Park. The gate and entrance route are better aligned with the central axis of the Grand Centre Walk to tie in with the prominent axis and symmetry of the Park's design.

7.3.14 Metalwork in the new gate is to reference the distinctive Crystal Palace building structure and pattern, tying into the rich historical narrative of the Park. The prominent location of the gate at the lowest point of the current axis presents an opportunity to interpret a visual link to the Palace structure which once sat at the highest point of the axis.

7.3.15 A monolith will be included in front of the entrance for signage and wayfinding. The proposed metalwork design referencing patterns from the historic Crystal Palace building is contextually appropriate. It is understood that the typography

for signage is being developed in collaboration with the Crystal Palace Park Trust to ensure coherency across the Park's branding. The Design Out Crime Officer comments on the signage are noted and the final design for the details of all wayfinding and signage are required to be submitted and agreed by condition.

7.3.16 The Park boundary walls to either side of the new gate will be renewed with 2m high brick walls. Full details of all proposed boundary treatments (including brick types) in Site A are required by condition. New planting areas are proposed to either side of the gate to mark the entrance. Due to the entrance route having steep levels from fixed constraints such as existing Highways levels and crossings, and numerous existing trees it is not possible to regrade the route to create a shallower and more accessible pathway. Therefore, a secondary entrance is provided, with a shallower 1:22 gradient to the south of the main gate.

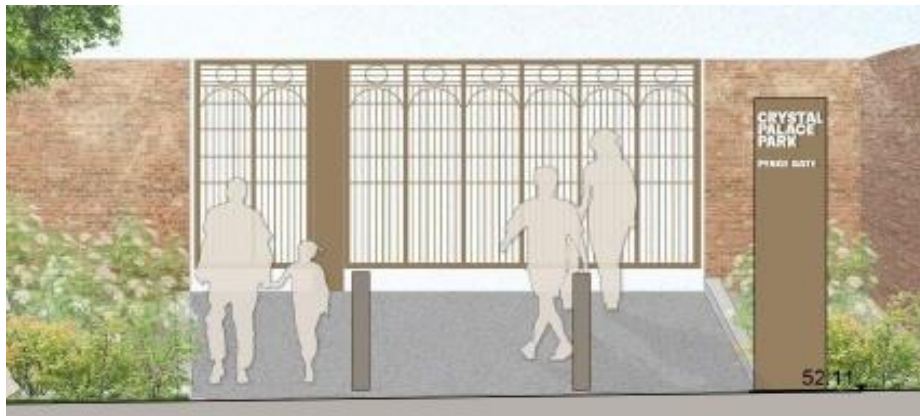


Fig 11: Elevation looking to new gate feature from Thicket Road



Fig 12: Extract plan showing Penge Gate entrance

Widening of Grand Centre Walk (Sites A and B)

7.3.17 The Grand Centre Walk is the central spine that Paxton used to unify the various character areas within the Park. The route originally terminated just before the current toilet block and Information Centre but now extends to Penge Gate.

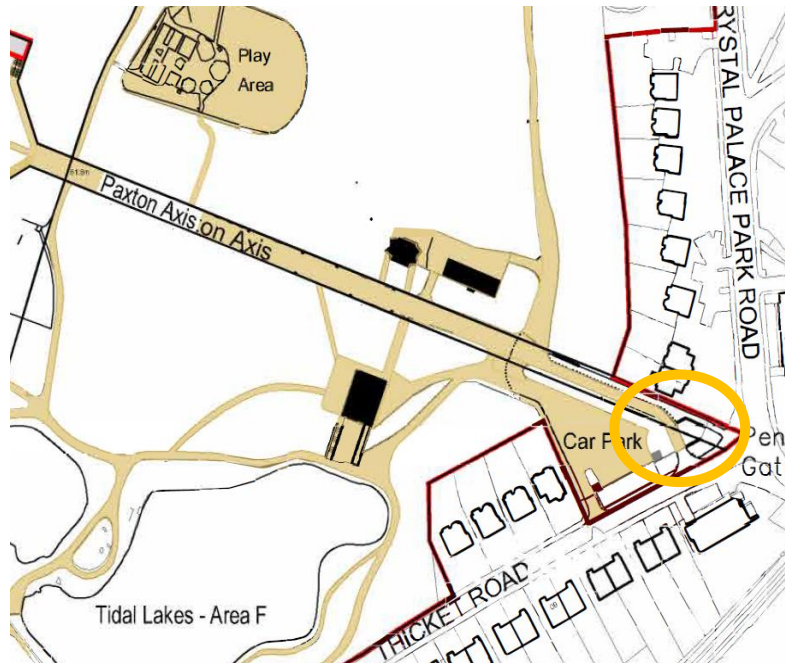


Fig 13: Existing hardstanding area (source: outline permission)



Fig 14: Proposed hardstanding area at Penge West Gate

7.3.18 The proposal is to restore the original extent of the Walk, which has been narrowed since Paxton's design by a double row of London Plane trees introduced either side.

7.3.19 The current width of the path would be retained and resurfaced in asphalt with decorative stone chippings. The original width of 29.26m will be reinstated with flexi-pave (or equivalent) which will surround the base of the London Plane trees. Due to the extensive root network of the trees, a no-dig construction will be necessary. This surface is naturally permeable.

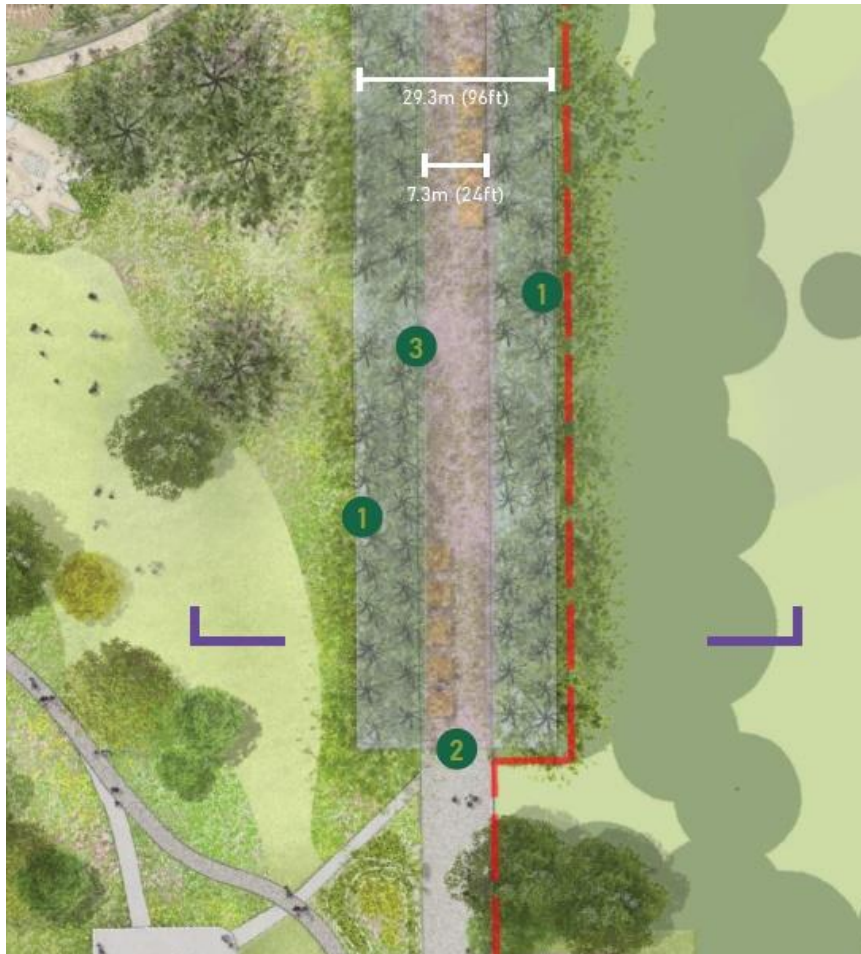


Fig 15: Illustrative plan of the improvements to the Grand Centre Walk

7.3.20 The Grand Centre Walk extends to Italian Terraces. The design intent to enhance and strengthen the central axial route and create a sense of destination through the relocation of the Paxton Bust is supported. The realignment of the path at the base of the steps and the installation of natural stone paving strips to reinforce a strong sense of symmetry is welcomed. As set out in the outline consent, it is noted that in Site B there would be a reduction of the landscape layout to the essential requirements, such as seating, steps, new paths and additional ramps, in order to prioritise the full restoration works to the walls, balustrades and steps. This is acknowledged and considered acceptable.

Lower Italian Terrace accessible ramp (Site B)

7.3.21 As discussed in section 7.1, the proposed lower Italian Terrace accessible ramp is considered to be inappropriate development in the MOL although it is considered to be acceptable under “very special circumstances”. The overall ramp would be 5.3m high (similar to match the height of the lower Italian Terrace) and 15m wide to the upper level of the ramp and 30m wide near the ground level. A seating area has been integrated halfway up the ramped route as a resting point and to offer views out over the Park. Historic England have been consulted throughout the design development stage and have raised no objections to the proposed ramp.

7.3.22 Officers commented that having only one ramp instead of two to the lower Italian Terrace could impact on the sense of symmetry in accordance with the original design ethos of the park. However, it is considered that this proposal would significantly enhance accessibility at this location and would encourage more visitors with mobility difficulties or families with prams etc, it is considered that the assessment of the appropriateness of the lower terrace ramp design should be informed by Historic England guidance.



Fig. 16 - Illustration of Lower Italian Terraces accessible ramp

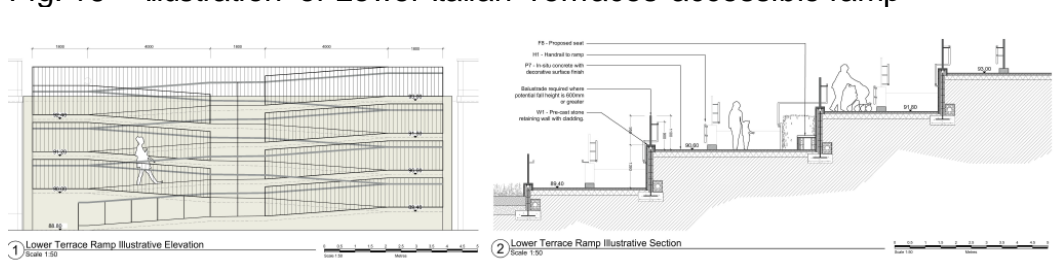


Fig. 17 - Illustrative front elevation and cross section plans

Upper Italian Terrace sloped accessible route and embankment (Site B)

7.3.23 A new step-free access would also be located to the southwestern wing of Upper Terrace with a user-friendly design and less challenging gradients. This ramp would be screened by additional tree planting and would create a more efficient and accessible route between the Lower and Upper Terraces integrated into the landscape. It would also enhance and re-grade the embankments between terraces, increasing accessibility, which is supported by officers.



Fig 18: Upper Italian Terrace sloped accessible (Site B)

Furniture (seating areas) – Sites A and B

7.3.24 In the outline permission, it was noted that in Site A, there are a high number of benches and bins along the Grand Centre Walk and there are a few benches and seating areas around the Tidal Lakes, particular the western side. These benches are not co-ordinated and surfacing below and around benches varies in condition, limiting accessible use. In Site B, most of the area is unlit at night and also there are no significant pieces of street furniture on the Terraces.

7.3.25 In this reserved matters application, the proposed landscape layouts for both Sites A and B are:

- Retaining and refurbishing benches and bins across Site A, allowing for lifting, cleaning and making good for the furniture items and their setting.
- Providing additional space for movable seating for large events around the Grand Centre Walk (such as the weekly market).
- Providing seating opportunities around the lakes as rest points that make the most of the views to the Dinosaur Sculptures.
- Introducing timber benches and providing back and arm rests as needed.
- Building on the narrative of the Geological Illustrations to form seating edges, seats and features.
- Positioning benches near the edge of the Lower Terrace belvederes to provide resting points with views over the Park.

- Improving lighting on major routes and key locations in Sites A and B

7.3.26 The locations of existing and proposed street furniture are illustrated on the plans below.



Fig 19: Site A – Existing and proposed street furniture locations and Types

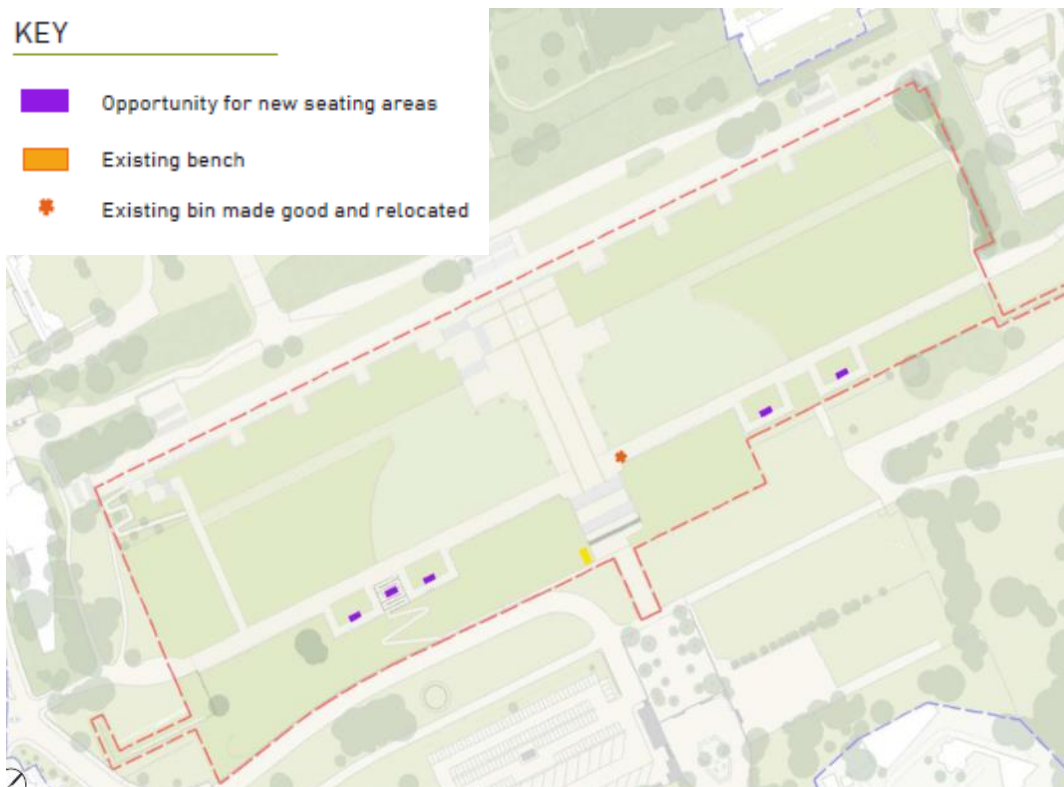


Fig 20: Site B – Existing and proposed street furniture

7.3.27 Overall, the new buildings and the park-wide proposed infrastructure improvements are sensitively designed and considered to respect and enhance the setting of this Historic Park. The scheme design is therefore considered to be acceptable in terms of visual impacts.

7.4 Heritage Impacts – Acceptable

Archaeology

7.4.1 The conservation of archaeological interest is a material consideration in the planning process. Paragraph 200 of the NPPF says that applicants should submit desk-based assessments, and where appropriate undertake field evaluation to describe the significance of heritage assets and how they would be affected by the proposed development. This information should be supplied to inform the planning decision. If planning consent is granted paragraph 211 of the NPPF says that applicants should be required to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) and to make this evidence publicly available.

7.4.2 For Sites A and B, the archaeological interest is focussed on the international site of the geology and dinosaur park plus the site of the Crystal Palace building. Due to the fire that damaged the Crystal Palace in 1936, most of the records associated with the building were lost. Therefore, it is necessary to treat the footprint of the Crystal Palace and related structures and terraces as an archaeological site. Any interventions within this space should therefore be undertaken within this context.

7.4.3 Given that the sites have heritage assets of archaeological interest, a condition was imposed on the outline planning consent (Condition 23) requiring that details of a programme of archaeological investigation in accordance with a Written Scheme of Investigation for these sites should be provided prior to any development taking place. The archaeological investigation would consist of a response to the proposed ground disturbance works and the historic material located about the Park. Historic England has been consulted and has raised no objections to the proposal.

Built Heritage

7.4.4 Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) set out the obligation on local planning authorities to pay special regard to safeguarding the special interest of listed buildings and their settings, and preserving or enhancing the character or appearance of conservation areas.

7.4.5 Paragraph 205 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be).

- 7.4.6 The proposals in this reserved matters application seek to address the longstanding Heritage at Risk issues at Crystal Palace Park, including the restoration of many landscape features within the grade II* Registered Park and Garden and its important built structures, including the Grade II Italian Terraces and the Grade I prehistoric dinosaurs and their associated geological features, lakes and islands.
- 7.4.7 The proposals to make a positive contribution to the designated heritage assets in a manner appropriate to their significance is supported by Historic England and would accord with the overarching principle of 'sustainable development' running through the NPPF.
- 7.4.8 For the proposed works to the Italian Terraces, Historic England supports the principle of the partial reinstatement of masonry walls and balustrades subject to the testing of materials to establish a suitable compatibility with the existing stone. Assessment of the appropriateness of the proposed repairs and the implementation/inspection of works should be determined/ approved by Historic England. It is proposed that all repairs and reinstatements of the balustrades are to be constructed from pre-cast reconstituted stone. The scope of the proposed works in this application is supported by officers, subject to Historic England approval, through their assessment of the separate Listed Building Consent applications.
- 7.4.9 A full set of comments from Historic England are attached in Appendix B. With regards to the works proposed to the statutory listed heritage assets, three listed building consent (LBC) applications have been submitted for the proposed works for:
- Grade I listed Prehistoric Animal Sculptures and Geological Court,
 - Grade II Italian Terraces, and
 - Grade II listed Sir Joseph Paxton Bust.

These applications have provided more detailed restoration works for these heritage assets and are currently in consultation with Historic England and the Conservation Officer.

7.5 Impact on neighbouring residential amenities – Acceptable

- 7.5.1 Development proposals are required, by policy, to respect the amenity of occupiers of neighbouring buildings and those of future occupants, providing healthy environments and ensuring they are not harmed by noise and disturbance, inadequate daylight, sunlight, privacy or by overshadowing.
- 7.5.2 The neighbouring comments are noted. Most of the neighbouring concerns relate to whether the ecology surveys include the roosting/ breeding sites for owls, woodpeckers or bats. It is noted that some concerns are related to Crystal Palace Sports Centre which is not part of this application site. With regards to the bird and tree surveys, these would be covered by a site-wide ecology surveys (Condition 21) and tree surveys (Conditions 25 and 26) required by the outline permission.

7.5.3 There are no immediate neighbouring properties around Sites A and B. Nevertheless, a Construction and Environmental Management Plan (CEMP) condition (Condition 9) was imposed in the outline permission which would provide an overarching strategic framework for the management of environmental effects and the implementation of measures prior to, and during, the demolition and construction phase of the Proposed Development.

7.5.4 A CEMP condition is recommended in addition to a noise monitoring strategy (Condition 39). Noise monitoring will be undertaken at receptor locations that are considered to be at risk from potential high noise levels. Noise monitoring will determine compliance with Local Authority limits and the need for any additional mitigation if limits are exceeded. It is therefore considered that the neighbouring impacts for the proposed works at Sites A and B are acceptable.

7.6 Transport and Highways – Acceptable

Penge Gate Car park Access (Approved)

7.6.1 Various junction alterations, including Penge Gate Car Park, were approved in the outline permission. The approved works for this entrance include:

- New two-way entry/exit which will be widened to accommodate two-way traffic.
- Existing exit-only access removed allowing for improved pedestrian access at Penge Gate
- Relocation of existing kerb buildout on Thicket Road
- New internally illuminated 'no entry' bollard signs to be installed.
- Fig 21: Penge Gat Car Park Layout and access routes

7.6.2 In the outline permission, two substations were proposed for demolition at this location. However, in the current scheme these substations would be retained on site. The applicants state that the maintenance access to these substations would be unaffected by the proposals.

Penge Gate Car Parking Layout

7.6.3 In the outline planning consent, a total provision of 21 parking spaces, including 15 standard sized bays and 6 enlarged bays (4 accessible bays and 2 electric vehicle bays) have been approved. The detail provided in the current application are consistent with what was approved. The car parking provision at this location is considered acceptable and would accord with Policy 33 of the BLP and London Plan Policy T2, which requires development to support the ten Healthy Streets Indicators in line with Transport for London guidance, reduce dominance of vehicles on London's streets, and be permeable and well-connected to walking and cycling routes, as well as public transport.



Penge Gate Car Park Modification

Fig 21: Penge Gat Car Park Layout and access routes

7.6.4 The Highways Officer has been consulted and has raised no objections to this arrangement. It is recommended that a swept path analysis for this car park should be submitted prior to the commencement of works. This is already a requirement of Condition 20 of the outline consent, along with details of car park management, electric vehicle spaces and disabled persons bays.

7.6.5 Emergency vehicle and servicing access will be maintained into the main Park, but a security gate or bollards will be provided to prevent unauthorized access from the car park. In addition, a signage condition is recommended to include details to be provided of how the pedestrian and vehicular entrances will be clearly demarcated.

Maintenance building yard access

7.6.6 The service access to the new Maintenance Depot would be shared with the existing Sydenham Gate Car Park main access. The proposed access point on Crystal Palace Park has already been approved at outline planning stage and the Sydenham Gate car park layout would be reconfigured, subject to another reserved matters application.

7.6.7 The proposed access to the Maintenance Building yard area would be controlled with a gate or bollards. The Highways Officer has been consulted and raised no objections. It is recommended that a swept path analysis for

this car park should be submitted prior to the commencement of works (covered by Condition 20 of the outline application).

Walking and cycling network for Sites A and B

7.6.8 The outline permission includes a condition requiring the submission of details of a site-wide Pedestrian and Cycle Strategy (Condition 19) in advance of this reserved matters application submission.

Cycle Parking

7.6.9 In the outline permission, a total of 125 cycle parking spaces are to be provided within the park, with 20 cycle parking spaces provided for the new Information Centre and 4 for the Maintenance Depot. In this current reserved matters application, an additional 8 new cycle parking spaces would be provided for the café and another 8 for the new children's play area. The provision of additional cycle parking in these locations is welcomed. It is considered that the proposed locations for these cycle parking facilities are acceptable. The cycle parking provision should be in line with Policy T5 of the London Plan, and the design should accord with London Cycle Design Standards (LCDS). This arrangement would be secured by Condition 47 of the outline planning consent.

Construction Logistics/Construction Management/ Delivery and Servicing

7.6.10 The applicants are also required to provide details on the Construction Logistics Plan for all construction activities in each phase, providing detail on how pedestrian and cyclist movement through the park will be maintained and how public transport will not be impacted during construction. Submission of these details is secured by Condition 9 of the outline planning permission. The Highways and Environmental Health Officers have been consulted and have raised no objections to this reserved matters application.

7.6.11 A Delivery and Servicing Plan for this reserved matters application is required by Condition 43 of the outline planning consent. This includes arrangements for delivery and servicing for temporary events (or alternatively this could be secured through a Framework Events Management plan).

7.7 Green Infrastructure and Natural Environment – Acceptable

7.7.1 London's green infrastructure is the network of parks, green spaces, gardens, woodlands, rivers and wetlands (as well as features such as street trees and green roofs) that is planned, designed and managed to:

- promote healthier living
- lessen the impacts of climate change
- improve air quality and water quality
- encourage walking and cycling
- store carbon
- improve biodiversity and ecological resilience

7.7.2 Policy G1 of the London Plan states that London's network of green and open spaces, and green features in the built environment, should be protected and enhanced. Green infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits. Metropolitan Open Land plays a key role in London's green infrastructure.

7.7.3 Policy G5 provides that Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. The inclusion of urban greening measures in new development will result in an increase in green cover and should be integral to planning the layout and design of new buildings and developments. This should be considered from the beginning of the design process.

Urban Greening Factor

7.7.4 In the outline planning consent, an Urban Greening Factor (UGF) was provided, which demonstrates that the proposed scheme would generate a site wide UGF score of 0.47. This comprised of many existing features including the ponds, woodland areas and amenity grasslands but also new areas of amenity grassland and flower rich perennial planting. Planting improvements were also proposed on the upper Italian Terrace and within the caravan club site.

7.7.5 In this reserved matters application, no updated UGF is provided. However, the applicants confirmed that the implementation of the proposed works at Sites A and B will support the achievement of a UGF score of 0.47 as set out in the original permission. Therefore, the proposals are acceptable and would meet the Mayor's target.

Biodiversity Net Gain

7.7.6 Biodiversity net gain is an approach to development that leaves biodiversity in a better state than before. This means that where biodiversity is lost as a result of a development, the compensation provided should be of an overall greater biodiversity value than that which is lost. This approach does not change the fact that losses should be avoided, and biodiversity offsetting is the option of last resort.

7.7.7 Policy G6 of the London Plan states that the following mitigation hierarchy should be applied to minimise development impacts:

- 1) avoid damaging the significant ecological features of the site
- 2) minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
- 3) deliver off-site compensation of better biodiversity value.

- 7.7.8 The application site is a Grade 1 Site of Importance for Nature Conservation (SINC). In accordance with BLP Policy 69 a development proposal that may significantly affect the nature conservation interest or value of a Site of Importance for Nature Conservation (SINC) will be permitted only:
- If it can be shown that the reasons for the development or benefits to the local community from the development outweigh the interest or value of the site, or
 - Any harm can be overcome by mitigating measures, secured through conditions or planning obligations.
- 7.7.9 In accordance with BLP Policy 70 where development proposals are otherwise acceptable, but cannot avoid damage to and/or loss of wildlife features, the Council will seek through planning obligations or conditions:
- Inclusion of suitable mitigation measures; and
 - The creation, enhancement, and management of wildlife habitats and landscape features to contribute towards the Bromley Biodiversity Action Plan.
- 7.7.10 The Bromley Biodiversity Plan (2021-2026) endeavours to promote coordinated action for biodiversity at the local level. The Plan has been produced by the London Borough of Bromley and the Bromley Biodiversity Partnership to support the delivery of the Bromley Local Plan 2019 and the green infrastructure and biodiversity obligations introduced by the London Plan (2021). The guidance includes details on the approach that developers will be expected to adopt to take in avoiding, mitigating and compensating for biodiversity impacts.
- 7.7.11 Habitats and species in the Bromley Biodiversity Plan are a material consideration in the determination of planning applications. Planning permission will not be granted for development or change of use of land that will have an adverse effect on protected species, unless mitigating measures can be secured to facilitate survival, reduce disturbance or provide alternative habitats (BLP Policy 72).
- 7.7.12 It is noted that the outline permission was approved before February 2024 when the Government's mandatory BNG 10% target was introduced for major developments. However, whilst the provision of 10% BNG is not mandatory, the proposal is still to be assessed under Policy G6 of the London Plan which requires developers to aim to provide a net gain in biodiversity.
- 7.7.13 In the outline application, the BNG assessment identified a predicted total of 277.47 habitat units and 3.78 hedgerow units could be achieved which represent a net gain in excess of 10% compared to the existing habitats on site.
- 7.7.14 In the supporting statement, the proposals for both Sites A and B continue to seek to enhance the ecological value of the Park through the creation of new habitats and mitigation for any habitats that will not be retained to support the Regeneration Plan requirements. Conditions attached to the outline consent

(4 and 21) will ensure that landscapes and habitats are enhanced and managed appropriately.

Trees

- 7.7.15 At the National Level it is Government policy to refuse development that will result in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) unless there are wholly exceptional reasons and a suitable compensation strategy exists. Footnote 67 provides the example of infrastructure projects “*where the public benefit would clearly outweigh the loss or deterioration of habitat) and a suitable compensation strategy exists*” (NPPF paragraph 186).
- 7.7.16 Policy G7 of London Plan instructs boroughs to safeguard veteran trees and ancient woodlands, identify opportunities for tree planting, and ensure retention of valuable existing trees in development projects. Replacement for removed trees should be based on their assessed benefits, with additional tree planting encouraged in new developments, especially large-canopied species.
- 7.7.17 Similarly, Bromley Local Plan Policy 73 requires proposals for new development to take particular account of existing trees on the site and on adjoining land, which in the interests of visual amenity and/or wildlife habitat, are considered desirable to be retained. Tree preservation orders will be used to protect trees of environmental importance and visual amenity. When trees have to be felled, the Council will seek suitable replanting.
- 7.7.18 At part of the outline permission, the applicants have submitted a site-wide Tree Compensation Strategy (Condition 3) to assess the approved park’s existing canopy cover and extent of loss established under the outline consent. This also includes the new survey data for Sites A and B collected in September 2023. Also, an Arboricultural report detailing the protection schemes for the retained trees has also submitted and approved under Condition 5 of the outline consent.
- 7.7.19 In this reserved matters application, an Arboricultural Assessment has been submitted for Sites A and B. This assesses the impact of detailed design proposals on existing trees and provides a comprehensive record of trees and evaluates emerging arboricultural effects. The application site includes a diverse array of trees, many categorised as high or moderate quality (BS5837:2012 categories A and B). The majority contribute to the park's character, but removals are proposed for young or stressed trees and unmanaged shrubs, ensuring the park's ecological value and amenity are retained.
- 7.7.20 This Assessment details proposed tree removals, largely in line with the outline permission but with some design adjustments. Notable adjustments include the retention of the Horse Chestnut T533 for Site B (north west corner of the upper Italian Terrace). The assessment recognises the need to remove

some trees due to diminished condition, ensuring ecological sensitivity and agreed removals with the Council's Tree Officer.

7.7.21 The report emphasises phased works to avoid bird nesting seasons and advocates for ecologically sensitive removals. It navigates through the specifics of each tree removal, emphasising the commitment to minimising disturbance to the park's arboricultural landscape. The document recognises the ecological value associated with certain removals while prioritising the park's overall health.

7.7.22 The Tree Officer has been consulted and no objections have been raised. Overall, the approach to trees is considered to be acceptable as the principles have been approved at the outline stage.

Protected Habitats and Species

7.7.23 The basis of all legal wildlife protection in the UK is the Wildlife and Countryside Act 1981 and all wild bird species and their nests and all species of bats are protected under this Act. In addition, the Natural Environment and Rural Communities 2006, section 41 states, "The Secretary of State must [...] publish a list of the living organisms and types of habitat which [...] are of principal importance for the purpose of conserving biodiversity."
<http://www.legislation.gov.uk/ukpga/2006/16/section/41>.

7.7.24 As identified in the Bromley Biodiversity plan, there are a number of habitats and priority species on site. Those habitats relevant to the proposed development are 'woodland', 'scrub', 'ancient and veteran trees' and 'grasslands'. Priority species listed in the Bromley Biodiversity Plan and relevant to the proposed development are birds, mammals (including bats), amphibians and reptiles and invertebrates.

7.7.25 The relevant habitats and priority species within the Crystal Palace Park have been established and agreed in the outline permission and a bat and bird survey condition was imposed (Condition 6). Details of this condition have been submitted and approved which sets out the site-wide biodiversity enhancement measures and how they will be incorporated into the Regeneration Plan.

7.7.26 Under this condition, Orpington Field Club and Bromley Biodiversity Partnership sub-group have commented that further bat surveys for the demolition of Ranger's Lodge and the cave (lead mine) and Limestone Cliffs should be carried out (Area 11 of the proposed repairs area). The applicants have stated that they will carry out an initial "bat roosting inspection" for the lead mine area so as to determine if there are any bats currently using the structure and if there are any structures suitable for roosting bats. This will then be followed by any subsequent measures should bat activities be identified. It is expected that these bat surveys will be carried out in May-June 2024.

7.7.27 A Framework Landscaping Plan and Landscape Management Plan has been submitted and approved under condition 4 of the outline application. Under this condition, the applicants have agreed to revise the proposed crab apple trees to the north west corner of the Italian Terraces at Site B and to include a native alternative.

Lighting scheme

7.7.28 A Lighting Scheme for Sites A and B is included in the Design and Access Statement (section 2.8).

7.7.29 The existing lighting within the Park is of varying quality, with much of the equipment in a state of significant disrepair. For Site A, the columns along Paxton Axis appear to have been relatively recently upgraded to 3000k LEDs, providing good quality light to the key route. There are also LED festoon lights on the cafe building that should be retained. For Site B, there is no existing lighting.

7.7.30 The proposed scheme includes lighting proposals in Site A – Grand Centre Walk, primary routes connecting to Crystal Palace Station, Penge Gate & Car Park area and entry path to Information Centre; and for Site B – along the access ramps and graded paths at the Italian Terraces, arches and the new location for the statue (Paxton Bust). It is noted that these proposals should comply with Condition 32 (Lighting scheme) of the outline permission.



Fig 22: Site A – Proposed lighting area

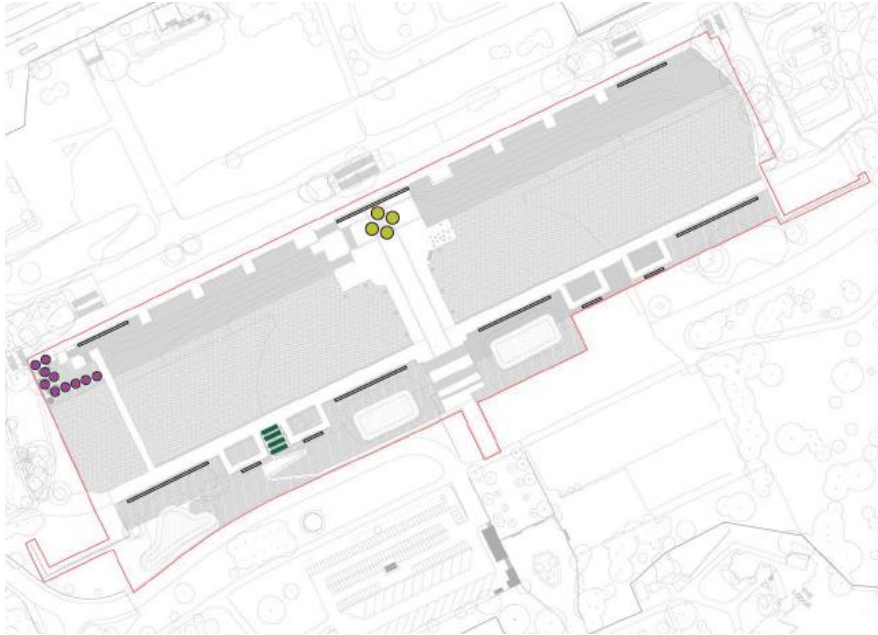


Fig 23: Site B – Proposed lighting area

7.8 Energy and Sustainability – Acceptable

7.8.1 Policy SI2 of the London states that major developments should be net zero-carbon, reducing greenhouse gas emissions in accordance with the following energy hierarchy:

- 1) be lean: use less energy and manage demand during operation
- 2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
- 3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
- 4) be seen: monitor, verify and report on energy performance.

7.8.2 A minimum on-site CO₂ reduction of at least 35 per cent beyond Building Regulations is required – Of the 35% residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures.

7.8.3 Policies 123 and 124 of the BLP are consistent with the strategic aims of the London Plan carbon reduction policies.

7.8.4 An Energy Statement has already been submitted and approved at the outline stage which demonstrated how the zero-carbon target will be met within the framework of the energy hierarchy and therefore, compliance with these principles has already been established. For this reserved matters application, in the Design and Access Statement, the applicants state that energy efficiency features will be incorporated in the proposed buildings and other elements of the redevelopment works within Sites A and B. For example, the building fabric for the new buildings will exceed Part L minimum requirements in terms of u-values and airtightness, low energy LED light fittings will be installed and on-site renewable energy will be incorporated in

the form of Air Source Heat Pumps alongside other electrical systems to provide space heating, cooling and hot water.

- 7.8.5 An updated Energy Strategy will need to be submitted for this phase of development as part of the pre-commencement condition for the outline permission (Condition 28). In the shadow S106 agreement, it was agreed that the applicants have to meet any shortfall in meeting the net zero carbon target via a payment in lieu to the Council's carbon offsetting fund of approximately £500,000, using the London Plan price of £95 per tonne of carbon.

7.9 Environmental Health - Air Quality, Noise & vibration and Land Contamination – Acceptable

Air Quality

- 7.9.1 London Plan Policy SI 1 sets specific requirements for developments in relation to air quality. It mandates that developments be Air Quality Neutral and incorporate design solutions to minimise exposure to air pollution. Large-scale developments should adopt an 'Air Quality Positive' approach, enhancing local air quality and demonstrating measures to reduce pollution exposure. BLP Policy 120 'Air Quality', mandates that developments impacting air quality or located in areas with high pollutant concentrations submit an Air Quality Assessment. They should strive to meet "air quality neutral" benchmarks as per the GLA's report. In Air Quality Management Areas, developments must incorporate Ultra Low NOx boilers and avoid biomass boilers unless they meet emission standards.
- 7.9.2 An Air Quality Assessment has been submitted for Site A only as Site B contains no buildings or developments that would impact on local air quality. For Site A, which constitutes around 14% of the total regeneration area, the proposed works will have minimal impact on local air quality. The development will exclusively use electric energy sources, eliminating combustion emissions. The assessment confirms that the road traffic emissions from the development are not significant and that the air quality for future users will be acceptable. The Proposed Development is classified as 'air quality neutral', and an Air Quality Positive Statement has been completed. Overall, the air quality impact of Site A is considered insignificant.
- 7.9.3 Considering the findings of the Air Quality Assessment it can be concluded that the proposed development complies with regional and local planning policies relating to air quality.

Noise & Vibration

- 7.9.4 Policy D7 of the London Plan mandates a Noise Impact Assessment for development proposals that might lead to significant noise impacts on existing or planned noise-sensitive uses. The assessment ensures that potential noise issues are identified and appropriately addressed in the planning process. Conversely, Policy D8 focuses on noise reduction and mitigation measures within developments. BLP Policy 37(e) requires new development to assess the impact on neighbours which includes noise. BLP Policy 119 focuses on minimising noise impact in developments. It mandates comprehensive noise

assessments, demanding new sources to maintain a 10dB difference from existing background levels at sensitive receptors.

- 7.9.5 A noise assessment has been submitted for Site A in support of this application. The applicants confirm that no noise assessment has been carried out for Site B as there are no operational noise sources associated with Site B's proposals (Environmental Statement – Statement of Conformity Feb 2024).
- 7.9.6 The noise assessment summarises that the function/ use of the Information Centre and the new Maintenance Depot would remain unchanged. It is assumed that the level of activity expected at the new Information Centre and the depot building will be very similar to the level of activity which currently occurs at both existing buildings. The report identified that the main sources of noise at the Maintenance Depot will generally be limited to activities within the yard. For the new Information Centre, it is noted that details on the Information Centre's heating and cooling systems, including air conditioning and ventilation, will have to comply with Condition 39 of the outline permission.
- 7.9.7 Therefore, the noise impact on public amenity spaces is considered insignificant. An assessment of the relocated Maintenance Unit reveals a low impact on nearby receptors during daytime and early morning activities. Therefore, the noise impacts of this application are considered acceptable.

Land Contamination

- 7.9.8 The land contamination assessment has been carried out and approved in the outline permission. The control measures on this matter are included in Condition 9 (CEMP) and Condition 22 (Contaminated Land Assessment).

7.10 Flooding and Drainage – Acceptable

- 7.10.1 Development Plan Policy requires all developments to incorporate Sustainable Drainage Systems (SuDS) or demonstrate alternative sustainable approaches to the management of surface water as far as possible. Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.
- 7.10.2 Drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.
- 7.10.3 The site is in Flood Zone 1 and the surface water flood risk is generally low, although there are medium and high risk areas in some parts of the Park, particularly on some of the pedestrian pathways around the lower lakes.
- 7.10.4 The surface water drainage strategy provides an assessment of the existing runoff rates and the attenuation storage required to restrict the 1 in 100 year storm event (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.

7.10.5 A flood risk and drainage strategy has been submitted. For Site A, this drainage strategy includes a combination of localised surface water management systems. The runoff generated by impermeable surfaces will be controlled individually for each area within the applications. The strategy involves using buried geocellular tanks at the Café and car park areas, filter drains, and the utilisation of existing landscape features for water management.

7.10.6 For Site B, the focus is on landscape-led proposals, with the majority of works involving improvements to the Italian Terraces. The drainage strategy here integrates an extensive network of filter drains and piped filter drainage to manage surface water runoff. Surface water will be conveyed to strategic locations for discharge, followed by conveyance to swales that provide attenuation and control the rate of runoff. The swale features within Site B offer substantial storage capacity, and the hydraulic calculations for the Site B drainage system are detailed in the submitted drainage strategy report.

7.10.7 The Drainage Officer has been consulted and has raised no objections to the proposed arrangements. It is noted that the detailed site-wide drainage strategies would be submitted and approved as part of Condition 29.

7.11 Community Engagement undertaken by the applicants.

7.11.1 As part of this reserved matters application, the applicant has provided a Statement of Community Involvement (SoCI). In summary, the applicants have carried out the following engagement sessions:

1. Information days

Sunday 3rd December and Monday 4th December 2023: Boards were displayed in the Park information centre to update park users on the latest Regeneration Plan proposals. As plans were in development at this point, the detail was high-level and gave users an insight into the direction of the project. These boards covered the following topics: Background to the Crystal Palace Park Regeneration Plan; Overview of Sites A and B; Site A in detail; Information Centre; Play Area; Heritage Trail and Penge Gate; Italian Terraces and Events and Programming. The SoCI states that “Over the two days, 151 people visited the centre. Feedback throughout the days was positive with many noting that the opportunity to be updated and to provide feedback was welcome.”

2. Playground consultation

11am – 4pm, Saturday 11th November 2023: A consultation day was held in the Park to understand what people thought of the current provision. The applicants also asked the same questions via an online survey which was live for 11 days. The SoCI states that “The in-person event was attended by more

than 100 children and their carers who shared their feedback. The online survey received a further 511 responses.” The findings of the survey showed that:

- Priorities for the playground are to have climbing and swinging activities;
- The sandpit is the most popular aspect of the current provision;
- Users find the size of dinosaurs most impressive which is emphasised by the Megalosaurus being the most popular Crystal Palace Dinosaur;
- Wide slides are the most popular option.

3. Additional stakeholder meetings

10th October 2023 (Conservation management plan workshop)

20th November 2023 (Design team update)

7.11.2 The SoCI concluded that these engagement exercises point to a continuing broad level of support for the Regeneration Plan and an investment in its development. Local community members have expressed a keen interest in keeping up to date with proposals as they become more developed and the London Borough of Bromley Regeneration team will continue with engagement approach as the project progresses.

7.12 Planning Obligations

7.12.1 The planning obligations for the outline planning permission are set out within conditions attached to the outline consent and the accompanying Shadow Section 106 agreement for planning ref. 20/00325/OUT.

7.12.2 Condition 8 of the outline consent requires details of a phasing plan for delivering the Regeneration Plan development, including the works to be included in each phase and the timeline for carrying out certain legal obligations.

7.13 Other Issues

Equalities Impact

7.13.1 Section 149 of the Equality Act (2010) which sets a Public Sector Equality Duty (PSED) came into force in April 2011 and requires the Council to consider the equality impacts on all protected groups when exercising its functions.

7.13.2 In the case of planning, equalities considerations are factored into the planning process at various stages. The first stage relates to the adoption of planning policies (national, strategic and local) and any relevant supplementary guidance. A further assessment of equalities impacts on protected groups is necessary for development proposals which may have equality impacts on the protected groups.

7.13.3 With regards to this application, all planning policies in the London Plan and Bromley Local Plan and National Planning Policy Framework (NPPF) which have been referenced where relevant in this report have been considered with

regards to equalities impacts through the statutory adoption processes, and in accordance with the Equality Act 2010 and Council's PSED. Therefore, the adopted planning framework which encompasses all planning policies which are relevant in the officers' assessment of the application are considered to acknowledge the various needs of protected equality groups, in accordance with the Equality Act 2010 and the Council's PSED.

- 7.13.4 It is also necessary to have due regard to the public sector equality duty, which sets out the need to eliminate unlawful discrimination, harassment and victimisation; to advance equality of opportunity; and to foster good relations between people who share a protected characteristic and people who do not share it. The protected characteristics to which the Public Sector Equality Duty (PSED) applies include age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, sexual orientation, religion or belief and sex.
- 7.13.5 The proposed development has been designed to take account of the specific needs of disabled people. It would incorporate suitable means of access for all people from the entrance points, sufficiently wide routes and access ways as well as independent horizontal and vertical movement that is convenient and ensures that people can make use of all outdoor recreational facilities and features within the Park.
- 7.13.6 The proposal would generate various benefits for the local economy by attracting more visitors to the Park and the wider Renewal Area. This would have a positive impact on economically inactive people and those unemployed which are those in the categories of age, sex and disability, as well as indirectly on children (workless households).
- 7.13.7 The overall regeneration of the site with the provision of landscaping and public realm enhancements, enhanced pedestrian and cycle routes, signage, lighting and a new, modern information centre would improve the overall visitor experience (including the safety and of security of visitors). The impact of the proposed development on crime and anti-social behaviour is therefore expected to have varying degrees of beneficial impact on the most vulnerable people including age, disability, sex, pregnancy, race, religion/belief and sexual orientation.
- 7.13.8 The proposal is expected to give rise to negative impacts in relation to demolition and construction, such as increased vehicular movements, noise and air quality aspects. These impacts would have the potential to affect the following equality groups; age, disability, pregnancy and maternity. These impacts are however considered short term and would depend on the measures that would be set out in the Construction Management Plan and other relevant conditions aimed to minimise disruption and mitigate the likely impacts.
- 7.13.9 In conclusion, it is considered that LB Bromley has had due regard to section 149 of the Equality Act 2010 in its consideration of this application and resulting recommendations to the Development Control Committee.

8. CONCLUSION AND RECOMMENDATION

- 8.1 This application is for the reserved matters on issues relating to appearance, landscape, access, layout and scale for Sites A and B only. The main proposed developments are: the demolition of the Ranger's Lodge (No. 33 Crystal Palace Park Rd) and Information Centre, the construction of a new Information Centre and Ranger's Maintenance Building, the conservation and repair of heritage assets within the Geological Court of the Tidal Lakes and Dinosaurs, and Italian Terraces; relocation of the Paxton Bust; alterations to hard surfaces, ground levels and tree removal; landscaping enhancements including introduction of new trees and planting; accessibility improvements; provision and rearrangement of pedestrian paths/vehicular access routes, car and cycle parking and a new gateway feature at Penge Gate; provision of new play space, new seating, lighting, wayfinding; drainage and ground works.
- 8.2 The principles of these proposed works have been established in the outline planning permission (planning ref: 20/00325/OUT). All of the proposed works in this application will conserve the heritage assets in a manner appropriate to their significance and would accord with the overarching principle of 'sustainable development' running through the NPPF. In assessing this application the Council has had due regard to its statutory duty under section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess, and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.
- 8.3 The restoration and repair of the heritage assets and the conservation work are considered to be of significant importance and they are widely supported by statutory consultees, amenity groups, adjoining London Boroughs and members of the public. The methods of repairs and restoration details (including final agreed materials for the Italian terraces) will be the subject of separate Listed Building Consents.
- 8.4 Most of Site A and B fall within MOL (except the new Maintenance Depot location) where inappropriate development should be refused unless 'Very Special Circumstances' clearly outweigh any harm resulting from the proposal by reason of inappropriateness, and any other harm. Within Sites A and B, most of the developments are related to outdoor recreation and they would also preserve the openness of the MOL. Therefore, these proposed works are considered as 'appropriate development' and are acceptable.
- 8.5 Given the size and scale of the proposed accessible ramp to the lower Italian Terrace, this development would have significant visual impacts on the openness of the MOL and is therefore considered to be 'inappropriate development'. However, when taking into consideration the community benefits provided by the new ramp, including the role it will play in supporting

“access for all” principles, this clearly outweighs the harm and therefore this development is considered acceptable in the MOL.

- 8.6 Furthermore, the proposed landscaping works appear sympathetic to the original Park layout and the proposals will see the delivery of publicly accessible green space. The new built facilities and gardens also aim to provide community, educational and cultural enhancements for park visitors. All of these improvements would provide substantial public benefits and an enhanced visitor offer which would benefit the wider renewal area and strengthen the sub-regional importance of the Crystal Palace Strategic Outer London Development Centre, in accordance with policies 15 and 111 of the Bromley Local Plan.
- 8.7 With all the reasons above, the application is recommended for permission, subject to planning conditions and relevant informatives.
- 8.8 This planning application has been processed and assessed with due regard to the Public Sector Equality Duty and, as discussed in the preceding section, officers consider that these proposals would not conflict with this Duty.

RECOMMENDATION: APPROVAL OF DETAILS

subject to the following planning conditions:

SUMMARY OF CONDITIONS AND INFORMATIVES

CONDITIONS

- Compliance with approved drawings

Pre-commencement

- Play space equipment details
- Details on Penge Gate Entrance design, including boundary wall details
- De-silting of the upper lake and reuse of silt

Above-ground works

- Details of wayfinding signage and interpretation, including signage demarcating the separate pedestrian and vehicular access at Penge Gate
- Specification and review of samples of proposed ground surface finishes;
- Detailed designs and specifications for lake edge treatments and finishes to ground surfaces around Grade I listed animal sculptures and geological features;

and delegated authority be given to the Assistant Director: Planning & Building Control to make variations to the conditions and to add any other planning condition(s) as considered necessary

INFORMATIVES

1. The following pre-commencement conditions as set out in the outline permission (planning ref: 20/00325/OUT) should be submitted to and approved by the Council prior to the commencement of works for Site A and Site B.

Phasing Plan submission

- Condition 8

Heritage impacts

- Condition 23 – Archaeological investigation

Transport and Highways

- Condition 9 – Construction and Environmental Management Plan (CEMP)
- Condition 19 – Pedestrian and cycle strategy
- Condition 20 – Parking Design and management Plan
- Condition 43 – Framework Events management Plan
- Condition 47 – Bicycle parking

Green Infrastructure and Natural Environment

- Condition 25 – Tree protection
- Condition 26 – Tree protection
- Condition 21 – Landscape and ecological management plan (bat surveys for Ranger's Lodge and the lead mine)
- Condition 32 – Lighting strategy

Environmental Health impacts

- Condition 22 – Contaminated Land assessment
- Condition 39 – Noise assessment

Flooding and Drainage

- Condition 29 – Surface water drainage scheme

Energy and sustainability

- Condition 28 – An updated Energy Strategy

2. The applicants are advised that the Design Out Crime Officer should be consulted prior to the submission of details of wayfinding signage and interpretation, including signage demarcating the separate pedestrian and vehicular access at Penge Gate.

Attachments

Appendix A Decision Notice for the outline planning permission (planning ref: 20/00375/OUT)

Appendix B Comments from Historic England

Appendix C Applicants' responses to the Friends of Crystal Palace Dinosaurs