

Committee	PLANNING COMMITTEE A	
Report Title	LAND SOUTH OF OLD BROMLEY ROAD ENTRANCE, BECKENHAM PLACE PARK, OLD BROMLEY ROAD, LONDON, BR1	
Ward	Downham	
Contributors	Adonica Giborees	
Class	PART 1	11 May 2017

Reg. Nos. DC/16/097594

Application dated 22 June 2016

Applicant Access Sport CIO

Proposal The construction of a community BMX cycling facility comprising a limestone grit track, landscaped grass mounds and a temporary metal storage unit at Beckenham Place Park, BR1.

LEW-01; 6429_LD_PLN_xxx; Construction Phase Plan; Block Plan; Site Location; Proposed Site Layout 3D Model 1; Proposed Site Layout 3D Model 2; Proposed Site Layout 3D Model 3; Design & Access Statement & Planning Statement, Ecological Appraisal, Phase 1 Flood Risk Assessment ; Beckenham Place Park Masterplan (for illustrative purposes).

Planning Statement and Statement in response to objections (received 25th November 2017);

Examples of BMX track signage (received 7th February 2017); and

Images of existing car park; London BMX parking note (received 10th April 2017)

Background Papers

- (1) Case File LE/250/D/TP
- (2) Local Development Framework Documents
- (3) The London Plan

Designation

Area of Archaeological Priority
PTAL 2
Green Chain Area and Walk

Metropolitan Open Land
Green Corridor
Site of Nature Conservation Importance
Flood Risk Zone 1
Area of Archaeological Priority
Urban Green Space
Beckenham Place Park

Screening

N/A

1.0 Property/Site Description

- 1.1 The application site is located within the north-eastern section of Beckenham Place Park, approximately 70 metres south of the Old Bromley Road entrance. The site is comprised partially of amenity green space together with an informal parking area.
- 1.2 To the north of the site is Cherry Blossom Pre-school, a skate park facility, children's play area, and two one/two storey buildings. To the east and south of the site is the Ten Em Bee Sports Development Centre and its playing fields. Further to the south east is the Ashgrove Estate comprising industrial and business units. The remainder of Beckenham Place Park is located to the south and west of the application site, as is the River Ravensbourne. To the north of the park there are a mixture of residential properties as well as a social club along Old Bromley Road.
- 1.3 The site is designated as Metropolitan Open Land, Public Open Space and Green Chain Area. The majority of Beckenham Place Park to the west is designated as a Site of Importance for Nature Conservation. Additionally, the site is located within Flood Zone 1 and has a Public Transport Accessibility Level (PTAL) of 2.

Regeneration proposals

- 1.4 Beckenham Place Park is the largest area of publicly accessible open space in the Borough, extending to 96ha, though is under-used relative to other parks. In 2014, the Council submitted a stage 1 bid to the Heritage Lottery Fund (HLF) for the regeneration of Beckenham Place Park through the Parks for People programme, which was approved. The Parks for People programme is focused on getting more local people to use regenerated open spaces.
- 1.5 The plans for Beckenham Place Park include new sport and leisure facilities including a 5km running route, trim trail, all weather and walking trails giving better access for those with limited mobility and for buggies, open water swimming and better cycling facilities generally, enhanced skate park and space for informal sports, such as football, cricket and rounders. Other features will include a restored natural lake, wet woodland area, a new cafe in the restored listed stableblock, new toilets in the east and west sides of

the park, an education centre, a volunteering hub, new children's play areas, an orchard and community food growing.

- 1.6 Planning and listed building consent applications were submitted in November 2016 for Phase 1, relating to the western side of the park. Proposals for the eastern side, within which the application site is located, are being developed in partnership with the Environment Agency and it is expected that an application will be submitted in the Autumn.
- 1.7 The present application for a BMX facility has been brought forward independently of the wider regeneration proposals, whilst also having been designed to integrate with the masterplan.

2.0 Planning History *Application site*

- 2.1 An application was submitted (ref. DC/04/56660) for the refurbishment of the changing rooms/public toilets building at Beckenham Place Park, Old Bromley Road, Bromley. This included the construction of an additional storey at first floor level incorporating a balcony, and a two storey extension to the side, to provide changing rooms, toilets, classrooms, offices, workshop, garage, tuck shop, café, plant rooms, stores and associated facilities, together with alterations to the elevations. The proposal also included landscaping, and the provision of a Go-Kart Track and car parking. The application was withdrawn.

Adjacent site

- 2.1 An application has been submitted for the proposed regeneration of part (west of rail line) of Beckenham Place Park, Beckenham Hill Road (ref: DC/16/099042). This application is yet to be determined. Related to DC/16/099042, an application for Listed Building Consent for the proposed rebuilding and conversion of the stable block at Beckenham Place Park, to provide a cafe and education centre, together with alterations to and refurbishment of Southend Lodge and the Gatehouse (re: DC/16/099043). This application is yet to be determined.

3.0 Current Planning Application *The Proposals*

- 3.1 The proposal is for the construction of a BMX bike track facility. The track would be 33m wide and 55m long. It would run around the edge of the site with a number of internal loops and would be approximately 250 metres long in total. It would have a series of obstacles ranging between 0.8m and 1.6m in height along each one of 6 straights. The 'start hill' (1.8m high) and the 6 straight stretches of track would be connected by 6 asphalted berms (corners). The track would be approximately 1,570 sq.m. in area.
- 3.2 The facility is proposed to be constructed using porous limestone dust for the track, with tarmac berm edges and starting point. The banks of the track would be grassed and seeded with wildflowers.

- 3.3 In order to construct the track facility, topsoil would be stripped back to the subsoil and clay level to a depth of approximately 10cm-15cm.
- 3.4 The only other excavation would be for drainage channels and soakaways. Drainage channels would typically be 50cm-70cm deep and soakaways usually up to 1m deep.
- 3.5 A 3m buffer would be provided between the outer edges of the track and existing paths and boundaries. No boundary treatment or flood lighting is proposed.
- 3.6 The site layout leaves three triangular-shaped spaces to the side of the BMX track facility; in the southern section, this would remain as open grass land, the eastern section would house a storage unit on repaired former car park surface, and the western section would be grassed.
- 3.7 The proposed storage unit would measure 6.1m (L) x 2.4m (W) x 2.4m (H), and would provide temporary storage of equipment for the community club including bikes which children could use during lessons.
- 3.8 The track would be an open access public facility open throughout the year and during the hours that the park is open (from 8am until 16.00-18.30 during November-March and 19.00-21.00 during April-October).
- 3.9 A community club would also host structured sessions up to three times per week (Saturdays and Sundays between 10.00 and 13.00 and after school during spring/summer months between 17.00 and 19.00). It is expected that there would be approximately 1 session per day (on average). The structured sessions are proposed to be open to all members of the community, and the club would share the track with any casual users.
- 3.10 Signage would be put up for the purpose of setting out general information relating to the use of the track.

Supporting Documents

Design & Access Statement and Planning Statement (July 2016, Access Sport CIO)

- 3.11 This document outlines the design development of the proposed scheme, and provides a policy compliance overview in support of the subject application. Supplementary statements submitted during the course of the application respond to issues raised during the consultation process.

Phase 1 Flood Risk Assessment (September 2016, Ambiantal Technical Solutions Limited. 2016)

- 3.12 This document sets out the potential sources of flooding, vulnerability and compatibility of the proposed development, an assessment of the flood impact, and recommended mitigation measures.

- 3.13 The report concludes that the proposed development is considered to be suitable assuming appropriate mitigation (including adequate warning procedures) can be maintained for the lifetime of the proposal.

Ecological Appraisal (July 2016, Land Use Consultants Limited)

- 3.14 This report provides an initial assessment of the ecological importance of the habitats in the areas relevant to the proposed BMX track facility, classification of the site's constituent habitats, and consideration of its suitability for notable faunal and floral species.
- 3.15 The report concludes that the site is considered to provide negligible ecological value, predominantly comprising amenity grassland which is both poor in structure and species diversity. Recommendations are made with respect to suitable seed mix for the proposed planting.

4.0 Consultation

- 4.1 This section outlines the consultation carried out by the applicant prior to submission and the Council following the submission of the application and summarises the responses received. The Council's consultation exceeded the minimum statutory requirements and those required by the Council's adopted Statement of Community Involvement.
- 4.2 Site notices were displayed and letters were sent to residents and businesses in the surrounding area and ward councillors.

Pre-Application Consultation

- 4.3 The applicant's Planning Statement sets out a number of communications undertaken with key stakeholders and organisations. These included school surveys, ward assemblies, discussion groups, as well as visitor observations. Key findings from the pre-application consultation are set out in the 'Community Engagement' section (pages 18-20) of the applicant's Planning Statement.
- 4.4 In addition, the applicant had pre-application discussions with Council officers (through a correspondence service).

Council Consultation

Written Responses received from Local Residents and Organisations

- 4.5 A total of nine representations were made in respect of the application. Of these, 4 were objections, 1 was in support and 5 provided comments.
- 4.6 The letter of support stated support for all the plans for the regeneration of Beckenham Place Park, especially the BMX track.
- 4.7 The objections raised the following points (summarised):

- Location

- Anti-social behaviour
- Disturbance / Disruption
- Appearance of storage facility
- Generation of rubbish
- Traffic impacts
- Environmental impacts
- Impacts on privacy
- Loss of green and open space
- Conflict with other activities in vicinity
- Concerns raised regarding disturbance caused by motorcyclists riding up and down Old Bromley Road performing hazardous tricks and endangering pedestrians and other road users.
- An unsupervised BMX facility in the proposed location coupled with the history and crime and antisocial behaviour make the proposal an unacceptable risk to the local community.
- Question as to the need for a further sporting activity centre, given the presence of the Ten-Em-Bee Sports Development Centre nearby.
- Risks of bad behaviour and petty crime.
- Concerns of disruption to the local community.
- Question as to why the BMX track facility could not be located in the former golf course area away from residential properties.
- Unclear on why the proposal includes a temporary storage facility and the appearance of a storage container.
- Whether the proposal is to be a locked facility – issues of people congregating at all hours without supervision. Preference for new higher fencing and gates in wrought iron.
- Rubbish would be generated as a result of the proposal.
- Increase in vehicles driving in the wrong direction along Old Bromley Road, a one-way road system.
- Environmental impacts –Ravensbourne River is close by and site is habitat for wildlife.

- The track would provide an elevated view of residential properties.
- Loss of green and open space.
- Shared access with playground may be hazardous to young children.

4.8 The responses neither objecting nor supporting the proposal made the following comments:

- The track could be linear along the fence line between Beckenham Place Park and the Ten Em Bee Sports Development Centre football grounds to the east, so that it does not take up the only parking area in this vicinity.
- Comment regarding the presence of asbestos, World War II bomb damage material and made-ground in the park. Contamination assessment is absent in the application.

Written Responses received from Statutory Agencies

4.9 *Designing Out Crime Officer (Metropolitan Police Service)*

No objections or comments.

Historic England – Archaeological Advisory Service

4.10 Historic England neither object nor support the application. Conditions are recommended however, requiring a written scheme of investigation by a suitably qualified professional, a watching brief for investigation and recording of features of archaeological interest which are revealed, and protective fencing to avoid accidental damage to the archaeology of the surrounding Beckenham Park Place Park landscape.

Environment Agency

4.11 The Environment Agency (EA) have no objections to the proposal. However they offer the following advice with respect to flood risk management, pollution prevention, and permits/consents/licenses:

The EA consider that the proposed development poses a low risk of flooding. They are satisfied that the location of the BMX track will not impede access to the bund for the flood alleviation scheme (FAS) which is currently being worked on in collaboration with the Council.

- Care will need to be taken to prevent any pollution to the Ravensbourne River, such as the discharge of sediment.
- The applicant will need to obtain the appropriate waste exemption or permit from the Environment Agency for the imported fill material (classified as waste) to be used on site.

Sport England

- 4.12 Object due to inadequate information, specifically whether replacement car parking would be provided prior to the BMX cycling facility being operational.

Responses from Internal Consultees

Ecological Regeneration Manager

- 4.13 The Council's Ecological Regeneration Manager has advised that there are no significant comments to make, however would like for the recommendation made in the ecological appraisal to incorporate an element of species-rich wildflower planting as part of the scheme design to be fully realised. A request has been made to require a mechanism to secure the delivery of this planting.

Highways and Transportation

- 4.14 It has been confirmed in the plans submitted as part of the wider park regeneration works (in the Transport Statement, Travel Plan & Parking Management Plan section 4.4.2) that the car park accessed via Old Bromley Road will be slightly relocated, but is expected to continue to provide around 20 parking spaces as it does currently. So, as the off-street parking provision will be re-provided as part of the wider park regeneration works, the proposed BMX Track Facility is considered unobjectionable.

Environmental Health Officer

- 4.15 Having checked the available historical records, there are no signs of any significant contaminative type activities having taken place in 1860, 1916 and 1953. In the intervening years there could be localised areas of contamination, however given the limited area and level of excavation involved in the proposed works, it is considered that a condition requiring a watching brief during excavation works and specifying that the chemical quality of imported materials will need to be appropriate for the use would be sufficient in this case.

5.0 Policy Context

Introduction

- 5.1 Section 70(2) of the Town and Country Planning Act 1990 (as amended) sets out that in considering and determining applications for planning permission the local planning authority must have regard to:-
- (a) the provisions of the development plan, so far as material to the application,
 - (b) any local finance considerations, so far as material to the application, and
 - (c) any other material considerations.

A local finance consideration means:

- (a) a grant or other financial assistance that has been, or will or could be, provided to a relevant authority by a Minister of the Crown, or
- (b) sums that a relevant authority has received, or will or could receive, in payment of Community Infrastructure Levy (CIL)

5.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) makes it clear that 'if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise'. The development plan for Lewisham comprises the Core Strategy, the Development Management Local Plan, the Site Allocations Local Plan and the Lewisham Town Centre Local Plan, and the London Plan. The NPPF does not change the legal status of the development plan.

National Planning Policy Framework

5.3 The NPPF was published on 27 March 2012 and is a material consideration in the determination of planning applications. It contains at paragraph 14, a 'presumption in favour of sustainable development'. Annex 1 of the NPPF provides guidance on implementation of the NPPF. In summary, this states in paragraph 211, that policies in the development plan should not be considered out of date just because they were adopted prior to the publication of the NPPF. At paragraphs 214 and 215 guidance is given on the weight to be given to policies in the development plan. As the NPPF is now more than 12 months old paragraph 215 comes into effect. This states in part that '...due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given)'.

5.4 Officers have reviewed the Core Strategy for consistency with the NPPF and consider there is no issue of significant conflict. As such, full weight can be given to these policies in the decision making process in accordance with paragraphs 211, and 215 of the NPPF.

Other National Guidance

5.5 The other relevant national guidance is:

On 6 March 2014, DCLG launched the National Planning Practice Guidance (NPPG) resource. This replaced a number of planning practice guidance documents.

London Plan (2016) (as amended)

5.6 The London Plan policies relevant to this application are:

Policy 1.1 Delivering the strategic vision and objectives for London

Policy 2.14 Areas for regeneration
 Policy 2.18 Green infrastructure: the network of open and green spaces
 Policy 3.2 Improving health and addressing health inequalities
 Policy 3.6 Children and young people's play and informal recreation facilities
 Policy 3.16 Protection and enhancement of social infrastructure
 Policy 3.19 Sports facilities
 Policy 5.21 Contaminated land
 Policy 6.9 Cycling
 Policy 7.1 Building London's neighbourhoods and communities
 Policy 7.2 An inclusive environment
 Policy 7.3 Designing out crime
 Policy 7.4 Local character
 Policy 7.5 Public realm
 Policy 7.6 Architecture
 Policy 7.15 Reducing noise and enhancing soundscapes
 Policy 7.17 Metropolitan Open Land
 Policy 7.18 Protecting local open space and addressing local deficiency
 Policy 7.19 Biodiversity and access to nature

London Plan Supplementary Planning Guidance (SPG)

5.7 The London Plan SPG's relevant to this application are:

Shaping Neighbourhoods: Play and Informal Recreation (2012)

Core Strategy

5.8 The Core Strategy was adopted by the Council at its meeting on 29 June 2011. The Core Strategy, together with the Site Allocations, the Lewisham Town Centre Local Plan, the Development Management Local Plan and the London Plan is the borough's statutory development plan. The following lists the relevant strategic objectives, spatial policies and cross cutting policies from the Lewisham Core Strategy as they relate to this application:

Spatial Policy 1 Lewisham Spatial Strategy
 Spatial Policy 2 Regeneration and Growth Areas
 Core Strategy Objective 6: Flood risk reduction and water management
 Core Strategy Objective 7: Open spaces and environmental assets
 Core Strategy Objective 10: Protect and enhance Lewisham's character
 Core Strategy Objective 11: Community well-being
 Core Strategy Policy 10 Managing and reducing the risk of flooding
 Core Strategy Policy 11 River and waterways network
 Core Strategy Policy 12 Open space and environmental assets
 Core Strategy Policy 14 Sustainable movement and transport
 Core Strategy Policy 15 High quality design for Lewisham
 Core Strategy Policy 19 Provision and maintenance of community and recreational facilities

Development Management Local Plan

5.9 The Development Management Local Plan was adopted by the Council at its meeting on 26 November 2014. The Development Management Local Plan, together with the Site Allocations, the Lewisham Town Centre Local Plan, the Core Strategy and the London Plan is the borough's statutory development plan. The following lists the relevant strategic objectives, spatial policies and cross cutting policies from the Development Management Local Plan as they relate to this application:

5.10 The following policies are considered to be relevant to this application:

DM Policy 1	Presumption in favour of sustainable development
DM Policy 24	Biodiversity, living roofs and artificial playing pitches
DM Policy 26	Noise and vibration
DM Policy 28	Contaminated land
DM Policy 30	Urban design and local character
DM Policy 43	Art, culture and entertainment facilities

6.0 Planning Considerations

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

- a) Principle of Development
- b) Location
- c) Design
- d) Noise and Disturbance
- e) Highways and Traffic Issues
 - i) Access
 - ii) Servicing
 - iii) Car Parking
- f) Biodiversity
- g) Neighbouring Amenity
- h) Other considerations

a) Principle of Development

6.2 In terms of the acceptability of the principle of siting such a use in the proposed location, there are two main issues: whether or not the proposal harmfully affects the Metropolitan Open Land (MOL) in which it sits and whether the displacement of the existing parking is acceptable.

6.3 In terms of the impact on MOL and Public Open Space Core Strategy Objectives 7 and 10 and Core Strategy Policy 12 seek to protect existing open space from inappropriate development, to ensure there is no adverse effect on their use, management, amenity or enjoyment in accordance with the principles of the London Plan Policy 7.17 which states:

“B) The strongest protection should be given to London’s Metropolitan Open Land and inappropriate development refused, except in very special circumstances, giving the same level of protection as in the Green

Belt. Essential ancillary facilities for appropriate uses will only be acceptable where they maintain the openness of the MOL.”

- 6.4 Green Belt policy is set out in the NPPF. At paragraph 89 it identifies a number of exceptions when a building in the Green Belt (or MOL) can be appropriate. One such exception is the provision of appropriate facilities for outdoor sport and recreation, as long as they preserve the openness of the designated area and do not conflict with the purposes of including land within it. In land use terms therefore, the provision of a BMX track would be appropriate within MOL, subject to other relevant considerations including parking, design and amenity.
- 6.5 The proposed BMX track facility would, in part, occupy an area used for parking, which is surfaced. The proposal would not remove parkland but change grass and an unofficial car park to an alternative type of parkland use. Additionally the wider proposal for the rest of the park proposes that a number of smaller buildings would be removed and as such the siting of the storage unit and track are not considered to harmfully affect the openness of the Metropolitan Open Land.
- 6.6 The proposed BMX track facility would give rise to the loss of an unofficial car park which can accommodate a maximum of 20-22 cars. The applicant has provided evidence in regard to the nature and usage of the car park which explains that the parking area is not an official car park, is not properly surfaced or marked out, and is not heavily used. The applicant states that the car park is rarely used for more than 3 cars at a time. This is the experience also of officers when site visits have been made to this location.
- 6.7 Additionally, the facility does not require parking facilities. This is a local BMX track facility designed to cater for people in the immediate area, able to reach the facility by bicycle or on foot. The capacity of the track will be a maximum of 16 people at any one time. They state that their previous experience of introducing BMX tracks in similar residential urban areas is that the vast majority of people using the track do not come by car. It is not therefore anticipated that there will be a need to accommodate substantial additional demand for parking because of the BMX track development.
- 6.8 The Environment Agency is scheduled to submit a planning application in Autumn 2017 which is predominantly for flood mitigation works within the park, but it is being brought forward jointly with the Council's Regeneration Team and would include regeneration proposals for the eastern side of the park, linking in with those for the western side which are already under consideration. Although the proposals are still under discussion, they include an area of car parking adjacent to the track facility.
- 6.9 In light of the above, the principle of developing the site for a BMX track is considered acceptable, subject to matters relating to suitability of location, design, biodiversity, river and flood risk, and neighbouring amenity. These are discussed in detail in following sections of this report.

b) Location

- 6.10 London Plan Policy 3.16 and Core Strategy Policy 19 outline that the preferred location for new community and recreational facilities would be in areas that are easily accessible and located within close proximity of public transport, other community facilities and services. Wherever possible, the multiple use of premises should be encouraged.
- 6.11 The decision to locate the BMX track facility in the eastern part of the park instead of the former golf course (in the western part) is considered appropriate as it consolidates multiple similar uses in one part of Beckenham Place Park. This in turn would help minimise travel distances for users and encourage community participation and inclusion. The location is close to the Ten-Em-Bee Sports Development Centre which has sports training programmes for cricket, tennis, netball and football. The introduction of a cycling facility would further improve the variety of sports available.
- 6.12 The proposed location would integrate with and complement neighbouring facilities such as the children's playground, skate park and sports development centre. Being located on the eastern side of the park, the BMX track would be situated a considerable distance from the Grade II* Listed Beckenham Place Mansion which is located on the western side of the park. It is also set away from the Beckenham Place Park conservation area which covers the listed mansion and associated parkland.
- 6.13 The proposed location for the BMX track facility is at the closest part of the park to Downham Town Centre, which provides easy accessibility and is within close proximity to services and public transport (albeit being in an area with a PTAL of 2). Furthermore, Access Sport has identified this location as preferable as the purpose of introducing the facility is to encourage young people in deprived areas to take up sport. They additionally note that there is a large population of young people and several schools in the local area which will benefit from the facility. The applicant provided the results of a 'hands-up survey' following a 3 month intensive programme with London Cycling Campaign (LCC) (Jan – Mar '15) when 617 young people took part in BMX sessions. The results showed:
- 95% enjoyed the BMX sessions
 - 79% felt they had learnt something new
 - 79% said they will cycle more from now on
 - 48% said they had cycled more since attending BMX sessions
- It is considered that the proposal would help to deliver a number of objectives of the London Plan and Council's Core Strategy aimed at maximising opportunities for sport and recreation through well-designed and managed spaces and increasing access to open spaces.
- 6.14 Whilst there was some concern over the location of a bike track in this location from objectors, for the reasons given the above, the proposed BMX track facility is considered to be in a suitable location.

c) Design

- 6.15 Paragraph 73 of the NPPF states that access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. . Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.
- 6.16 Core Strategy Policy 15 states that the Council will apply national and regional policy and guidance to ensure the highest quality design, while DM Policy 30 echoes how important good design is. Any proposed scheme for this site will be assessed with consideration to the design, character, sense of place and contribution to the environment.
- 6.17 The track would have mounds around its perimeter which would slope up to the track (no more than 45 degrees). They would be grassed and seeded with wildflowers to soften the appearance of the track, mould it into the surrounding grassland and minimise visual impact of the proposal. The proposed wildflower planting would also add colour, interest and texture to this area of the park.
- 6.18 With a maximum height of 1.6m (with the start hill being 1.8m), the entire track facility is of low profile and modest design, and would be unobtrusive when viewed in the context of the entire park, as well as the wider surrounding environment. It would also be screened by existing trees which are to be retained.
- 6.19 The materials proposed for the track would mean it would not significantly stand out within the park landscape. The appearance of the porous limestone dust can be likened to the surface of the existing car parking area, though lighter in colour.
- 6.20 The border between the track line and paths, car park and boundaries is designed in a way to protect access for existing and future users. This is considered appropriate, and is aligned with the safety standards of the Royal Society for the Prevention of Accidents (RoSPA).
- 6.21 The proposed temporary storage container, at a height of 2.4m, would not be a prominent structure within the wider landscape. From outside of the park, this structure would be screened by existing trees on site which are to be retained. The unit would be visible within the park and is at present proposed to be green in colour. There has been some local concern over the appearance of the unit and Officers consider that more could be done to integrate it and as such a condition seeking details of its external treatment has been attached. The treatment could be in the form of nature based or other inkeeping artwork or timber cladding. These details would be required before the cycle facility opens.
- 6.22 It is considered that the track has been sensitively designed and set-in in order to retain the open space surrounding the site. Overall, the design and

appearance of the proposed BMX facility is considered appropriate in the context of its setting.

d) Noise and Disturbance

- 6.23 BMX bikes do not produce high levels of noise against track surfaces. Cumulatively, there is likely to be some audible sound from a number of BMX bikes and their users on the track at the same time. However the level of noise generated by use of the track would likely be insignificant from outside of the park given the screening on the boundaries closeby.
- 6.24 There would be some noise associated with the activity, for example general noise from persons entering and exiting the site, patrons and observers interacting with one another, and from training sessions. The noise increase is not expected to be significant or harmful to neighbouring residents given the scale of the park and the options that users could enter/exit using several different routes, there is significant screening on close by boundaries and that park has existing noise levels from general use. Particularly with the presence of a skate park nearby, overall, the level of noise associated with the proposed activity is commensurate with the use of public open space used for a range of activities such as ball sports, skate parks, playgrounds etc.
- 6.25 Some concerns were raised by local residents with regard to noise and disturbance and it can be confirmed that it is a facility for bicycles not motorbikes. Unlike skateboards, BMX bikes do not make noise against the track surface. Access Sport has experience of BMX tracks in 15 other London boroughs and there is no evidence to suggest additional noise would be created by this facility. Opportunities for anti-social behaviour would be limited as the track would be a managed facility with sessions being run on a regular basis, it would not be lit and would be within the park which is locked at night.
- 6.26 The track will be a free to use public facility that is safe and self-regulating. As in other parks, cycling in the park would be regulated in the normal way by bylaws with pro-active management by Park Wardens, the local police and club volunteers and coaches. Through qualified coaches and Bikeability the club and coaches would teach responsible, safe cycling at the club and in local schools. The applicant has stated that the majority of BMX tracks in London are located in public parks and they are not aware of any complaints of BMX related cycle nuisance since 2011 in any of these parks.
- 6.27 The community BMX club that will be developed by Access Sport will be able to give regular updates to the Parks management team regarding the condition of the facility and the surrounding area. The applicant has agreed with the Parks Service that the Council would erect appropriate signage that specifies the rules for using the facility and have submitted examples of such signage erected in other London parks.
- 6.28 Overall, it is considered that the proposal would not result in significant additional noise or disturbance to neighbouring residential properties or the local community in accordance with Core Strategy Policy 12.

e) Highways and Traffic Issues

i) Access

- 6.29 Access to the proposed BMX track facility would be via the existing access way into the car parking area over which the proposal is to be located. This is considered appropriate as access to multiple facilities would be consolidated thereby ensuring any impacts arising in terms of traffic safety are appropriately mitigated.
- 6.30 Some local concern was raised that there may be an increase in vehicles driving the wrong way around Old Bromley Road and that the shared access with other park facilities could pose a safety hazard. It is not considered that the proposal will give rise to a significant number of trips by car and therefore the likelihood of these being significant issues is low.

ii) Servicing

- 6.31 No specific servicing requirements have been identified by the applicant. It is considered that any servicing vehicles (likely those to maintain the track and drop off and pick up and equipment from the temporary storage unit) would be infrequent and could utilise the existing access.

No cycle parking facilities are proposed as users would either be on their own bikes or use those stored within the unit.

iii) Car Parking

- 6.32 As discussed above, the proposal would result in the loss of part of the existing, informal car parking area. The loss is not considered significant given that the car parking is not well used and there is sufficient capacity on surrounding streets to accommodate cars. In the wider plans for regenerating the park a car park is proposed adjacent to the track although that will come forward at a later stage (application expected Autumn 2017) and this is to provide a small parking area of approximately 20 vehicles to handle the overall expected increase in user numbers. There are other parking areas within the park, but given its scale these are a distance away. The applicant, who runs a number of other facilities in London, has provided details of parking arrangements at 9 such venues. The majority of these facilities have no dedicated parking or limited parking shared by the park within which they are situated and most are located in parking controlled areas. Additionally, the proposed facility is not of sufficient scale to host a BMX race event. As most patrons are likely to live within the local area and many will cycle to the site, it is not anticipated that the proposal would generate a significant amount of additional vehicles to the site.
- 6.33 Additionally, reference is made to the Transport Statement submitted in respect of the application for the regeneration proposals on the western side of the park. As it relates to the wider regeneration proposals (for both sides of the park) it is relevant also to the present application. Key points made by that document are set out below:

- a. Unrestricted on-street parking is generally available on roads around the park. Visits made during the writing of this statement found availability to be good.
- b. The roads in the Beckenham Place Park (BPP) area are generally residential in nature and lightly trafficked, particularly at peak visitation times for BPP visitors, typically between midday-1pm on a weekday and 2-3pm on a Sunday. As to be expected, BPP visitation is negligible during external road network peak hours, particularly so given the park's closure to vehicles at dusk.
- c. Along with parking opportunities within BPP, the surrounding roads offer widespread opportunity for motorists to park-up on unrestricted roads around the park, particularly to the northeast and southeast where access is most convenient, and enter via pedestrian/cyclist or vehicular gates. This availability is increased during weekends when commuter parking is absent.
- d. On-street parking availability on the local surrounding roads is generally good, with parking typically available on both sides of the road around the entrance to the park where the BMX track is proposed. This is particularly so at weekends when parking by rail commuters is less prevalent. Site observations have concluded that any occasional overspill parking would therefore be comfortably accommodated on-street.

6.34 As such, although the existing car park would be removed, officers are satisfied that it is not heavily used, that the proposal would not generate significant parking demand and that it could be accommodated on surrounding streets.

6.35 The Council's Highways Officer has reviewed the proposals, and the Transport Statement and raised no objection on the basis that equivalent off-street parking provision will be re-provided as part of the wider park regeneration works.

6.36 Overall, the proposed development would not result in significant impacts with respect to highways and traffic issues.

f) Biodiversity

6.37 The ecological report provided as part of the application sets out that, in theory, the proposal has the potential to attract increased numbers of visitors to the park. However, given the specific nature of the proposed BMX track facility, users are likely to focus their attention on the facility, and therefore it is considered unlikely that such a niche facility would contribute to increasing recreational pressures or anti-social activities within the wider park.

6.38 Potential lighting impacts to protected species such as bats would not occur given there is no lighting proposed as part of the proposal.

- 6.39 The provision of dirt tracks, mounds and jumps is likely to create disturbed soil conditions which can provide suitable conditions for uncommon invertebrates.
- 6.40 The applicant's ecological report recommends a suitable seed mix for the planting of wildflowers that seeks to use native seed.
- 6.41 The Council's Ecological Regeneration Manager has not raised any concerns with regard to the findings of the ecological report, however recommends that a process be put in place to ensure delivery of the planting of wildflower. A condition is recommended to this effect, requiring a detailed landscaping scheme be submitted for approval.
- 6.42 Overall, the scheme is considered likely to result in an ecological benefit within the site.

g) Neighbouring Amenity

- 6.43 The boundaries surrounding the site are well treed with evergreen, dense trees and as such are likely to provide a sufficient visual screen between the houses and the track. They will also provide a level of noise protection. Whilst there is a small gap in the trees along this boundary, the views are towards the Ten-Em-Bee sports ground and possibly a small portion of the rear gardens of residential properties which front Old Bromley Road to the east.
- 6.44 At a maximum height of 1.8m for the start hill (with undulations between 0.8-1.6m across the rest of the track), users would be elevated above natural ground level. The distance from the nearest residential rear elevation and the start mound would be 40m. The impact in terms of overlooking on these residential properties as a result of the proposed development would be minimal given the separation distance involved and presence of mature planting on the boundary, even when elevated.
- 6.45 Only members would have access to the storage unit, and it would only be open during the times the community club is running structured sessions on the site. The storage unit would remain locked outside of these times. As with the remainder of the facility, there would be no access once the park closes, therefore it is not considered necessary to construct fencing around the facility. A fence would also make it appear as a more solid structure in long views, harmful to preserving the openness of the MOL.
- 6.46 A litter bin is proposed to be located in the northern part of the site, close to the access way into the site. This is considered appropriate to enable patrons to dispose of any rubbish they produce during their visit to the BMX track facility. The provision of a rubbish bin would mitigate any potential impacts arising from rubbish being generated as a result of the proposal. This would alleviate a concern raised in a letter of concern.

h) Other considerations

River and Flood Risk

- 6.47 Core Strategy Policy 11 seeks to ensure that the River Ravensbourne Network, among others, is preserved and enhanced. Development adjacent to rivers should contribute to their special character. The proposed development would be located approximately 55m to the east of the River Ravensbourne. At this distance, and given that the proposal is of modest scale and will be grassed and planted to create an attractive park feature, it is not considered that it would have a material impact on the river.
- 6.48 The application site is located within Flood Zone 1 and therefore at low risk of flooding. The applicant has submitted a Phase 1 Flood Risk Assessment in support of the scheme. Given that the site is located outside the area of modelled flood extents, has a site area of less than 1hectare, that the design incorporates permeable materials and soakaways and that the use would be classified as 'Water Compatible' under the NPPF, it is considered that the proposals would be acceptable in terms of flood risk.

Archaeology

- 6.49 The site is located within an Area of Archaeological Priority. Within these areas, Development Management Plan 37 advises that development proposals may require preliminary archaeological site evaluations. In this case the degree of excavation is limited. Historic England were consulted on the proposals and recommended that a condition be attached to any approval requiring a watching brief to be carried out during the excavation works and the results of archaeological evaluation to be reported. With the benefit of this mitigation, it is considered that the proposals are acceptable in reference to DM Policy 37.

Ground contamination

- 6.50 Concern was raised during the consultation process that the site may be contaminated with bomb arisings and asbestos. The Council's EHO has checked the available historical records and has advised that there are no signs of any significant contaminative type activities having taken place in this location. Additionally, the results of investigations undertaken in relation to the wider masterplan works have indicated that, although there is evidence of bomb arisings and asbestos in the eastern side of the park, they do not occur in the application site boundary. The proposed works involve limited excavation but nevertheless, the Council's EHO has advised that a precautionary approach be taken, recommending a watching brief during the excavation stage. This is proposed to be controlled by condition.

7.0 Conclusion

- 7.1 This application has been considered in the light of policies set out in the development plan and other material considerations.
- 7.2 The principle of developing the site for a BMX track is considered acceptable, as it would constitute an appropriate use within MOL. The proposal would not remove parkland but change grass and an unofficial car park to an

alternative type of parkland use, providing a new recreational facility for local residents and extending access to and use of this part of the park.

- 7.3 The location of a BMX track facility in the eastern part of the park is considered appropriate as it consolidates similar uses in one part of Beckenham Place Park, in the closest part of the park to Downham Town Centre.
- 7.4 The track facility would be of low profile and modest design, and would be unobtrusive when viewed in the context of the entire park, as well as the wider surrounding environment. It would also be screened by existing trees which are to be retained. The proposed storage unit would be sited temporarily and subject to a condition requiring details to be submitted for approval of an external treatment to help integrate it with its surroundings.
- 7.5 Although the existing informal car park would be removed, officers are satisfied that it is not heavily used, that the proposal would not generate significant parking demand and that that demand could be accommodated on surrounding streets.
- 7.6 Overall, it is considered that the proposal would deliver a new, well-designed recreational resource in an appropriate location and would not give rise to any significant impacts which cannot be adequately mitigated through the proposed conditions.

8.0 RECOMMENDATION
GRANT PERMISSION subject to the following conditions:-

Conditions

Time limit

1. The development to which this permission relates must be begun not later than the expiration of three years beginning with the date on which the permission is granted.

Reason: As required by Section 91 of the Town and Country Planning Act 1990.

Approved plans

2. The development shall be carried out strictly in accordance with the application plans, drawings and documents hereby approved and as detailed below:

LEW-01; 6429_LD_PLN_xxx; Construction Phase Plan; Block Plan; Site Location; Proposed Site Layout 3D Model 1; Proposed Site Layout 3D Model 2; Proposed Site Layout 3D Model 3; Ecological Appraisal, Phase 1 Flood Risk Assessment.

Reason: To ensure that the development is carried out in accordance with the approved documents, plans and drawings submitted with the application and is acceptable to the local planning authority.

Archaeology

3. a) No development at or below ground level shall take place until a Written Scheme of Investigation (WSI), which has been submitted to and approved in writing by the local planning authority, has been implemented.

b) The WSI to be submitted and approved under part (a) above shall include a statement of significance, research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works and the programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material.

Reason: To ensure adequate access for archaeological investigations in compliance with Policies 15 High quality design for Lewisham and 16 Conservation areas, heritage assets and the historic environment of the Core Strategy (June 2011) and Policy 7.8 of the London Plan (July 2011).

Site investigation

4. (a) If during any works on the site, contamination is encountered which has not previously been identified (“the new contamination”) the Council shall be notified immediately and the terms of paragraphs (i) (ii) below shall apply to the new contamination. No further works shall take place on that part of the site or adjacent areas affected, until the requirements of paragraphs (i) and (ii) below have been complied with in relation to the new contamination.
- i) A desk top study and site assessment to survey and characterise the nature and extent of contamination and its effect (whether on or off-site) and a conceptual site model shall have been submitted to and approved in writing by the local planning authority; and
 - (ii) A site investigation report to characterise and risk assess the site which shall include the gas, hydrological and contamination status, specifying rationale; and recommendations for treatment for contamination encountered (whether by remedial works or not) has been submitted (including subsequent correspondences as being necessary or desirable for the remediation of the site) to and approved in writing by the Council.
 - (iii) The approved remediation scheme arising from (i) and (ii) shall be implemented in full.

(b) All imported or reused soil material to be used in the formation of the BMX track facility shall conform to relevant soil quality requirements, namely S4UL’s, C4SL’s, SGV’s as appropriate.

Reason: To ensure that the local planning authority may be satisfied that potential site contamination is identified and remedied in view of the historical use(s) of the site, which may have included industrial processes and to comply with DM Policy 28 Contaminated Land of the Development Management Local Plan (November 2014).

Storage Unit- external treatment

5. a) Prior to first siting of the storage unit hereby approved on the site, details of the external treatment of the structure (such as artwork or timber cladding to assist its integration within the park setting) shall have been submitted to and approved in writing by the local planning authority.
- b) The approved treatment shall be applied and completed within 2 months of the first use of the storage unit and maintained thereafter.

Reason: To ensure that the local planning authority may be satisfied as to the external appearance of the storage unit and to comply with Policy 7.17 of the London Plan (2016), Policy 12 Open space and environmental assets and Policy 15 High quality design for Lewisham of the Core Strategy (June 2011) and Development Management Local Plan (November 2014) DM Policy 30 Urban design and local character.

Storage Unit- temporary siting

6. The temporary storage structure hereby permitted shall be removed and the land restored within 3 years of the date of this permission.

Reason: The type of building is not such as the local planning authority is prepared to approve, other than for a limited period, in view of its appearance in the interest of the visual amenity of the area and in accordance with Policy 15 High quality design for Lewisham of the Core Strategy (June 2011) and DM Policy 30 Urban Design and local character of the Development Management Local Plan (November 2014).

Soft landscaping

7. (a) A scheme of soft landscaping (including details of species-rich wildflower planting, proposed plant numbers, species and location) and details of the management and maintenance of the landscaping for a period of five years shall be submitted to and approved in writing by the local planning authority prior to first use of the BMX track.
- (b) All planting, seeding or turfing shall be carried out in the first planting and seeding seasons following the completion of the development, in accordance with the approved scheme under part (a). Any trees or plants which within a period of five years from the completion of the development die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species.

Reason: In order that the local planning authority may be satisfied as to the details of the proposal and to comply with Core Strategy Policy 12 Open space and environmental assets, Policy 15 High quality design for Lewisham of the Core Strategy (June 2011), and DM Policy 25 Landscaping and trees and DM Policy 30 Urban design and local character of the Development Management Local Plan (November 2014).

Construction hours and deliveries

8. No deliveries in connection with construction works shall be taken at or despatched from the site other than between the hours of 8 am and 6 pm on Mondays to Fridays and 8 am and 1 pm on Saturdays and not at all on Sundays or Public Holidays.

No work shall take place on the site other than between the hours of 8 am and 6 pm on Mondays to Fridays and 8 am and 1 pm on Saturdays and not at all on Sundays or Public Holidays.

Reason: In order to safeguard the amenities of adjoining occupants at unsociable periods and to comply with Paragraph 120 of the National Planning Policy Framework and DM Policy 26 Noise and Vibration, and DM Policy 32 Housing design, layout and space standards of the Development Management Local Plan (November 2014).

Control of external lighting

9. Notwithstanding the Town and Country Planning (General Permitted Development) Order 2015 (or any Order revoking, re-enacting or modifying that Order), no lighting shall be installed or operated on the site without express planning consent from the Local Planning Authority first being obtained.

Reason: To safeguard the amenities of the adjoining premises and the area generally and to comply with DM Policy 27 Lighting of the Development Management Local Plan (November 2014).

Informatives

- A. **Positive and Proactive Statement:** The Council engages with all applicants in a positive and proactive way through specific pre-application enquiries and the detailed advice available on the Council's website. On this particular application, positive discussions took place which resulted in further information being submitted.
- B. You are advised that all construction work should be undertaken in accordance with the "London Borough of Lewisham Code of Practice for Control of Pollution and Noise from Demolition and Construction Sites" available on the Lewisham web page.