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Planning Services
3rd Floor Laurence House
Catford
London SE6 4RU

Date: 17/05/2018
Ref: PRE/18/106811

Ms Alison Taylor
Project Manager
Regeneration and Place
London Borough of Lewisham
SE6 4RU

Dear Ms Taylor,

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
Beckenham Place Park (west of railway line), Beckenham BR3**

I refer to the pre-application submission and meeting held on the 2nd May 2018. The officers present at this meeting were Vincent Murphy (Planning Officer), Valerie Harris (Planning – Trees Officer) and myself, Suzanne White (Development Manager Team Leader – South Area). Bethany Gale (Senior Landscape Architect, BDP) and you were present representing the applicant. Catherine Paterson (Highways Officer), Natasha Peach (Conservation Officer) and Richard Farr (Tree Services Manager) have been consulted regarding the potential changes which were the subject of the meeting, either previous to or following the meeting being held.

You have submitted the following documents to us to assess:

- Email with accompanying justification statement from Alison Taylor to Vincent Murphy dated 16/05/18, providing the applicant's justification for the reduction in dry and secure cycle parking spaces, which is set at 26 by a condition of the underlying planning permission;
- Email from Bethany Gale to Vincent Murphy dated 25/04/18 explaining background and current design information, and alternatives considered;
- Drawing Nos. BP(90)LS001 and BP(90)LS002;
- 'Case Study – Cellweb TRC – 69 Church Lane, Oakley, Bedfordshire' leaflet;
- Email from Bethany Gale to Vincent Murphy dated 27/04/18 containing tree specification information and photographs.

Site description and history

The application site is within Beckenham Place Park (BPP), which is a 96ha public park located in the south of the borough, adjoining the London Borough of Bromley on its southern edge. The park is bounded on its northern, southern and western edge by residential streets and properties and on its eastern side by playing fields. The park is divided by a railway that runs roughly north-south.

The application site, comprising land to the west of the railway, is 71.5ha including 18ha of woodland including 13ha of Ancient Woodland. The majority of the application site was previously laid out as a golf course. Within the site is a Grade II* listed Mansion as well as the Grade II listed Stable Block, Stable Cottage, Gardener's Cottage and Walled Garden, Southend Lodge and Gatehouse. The site is an Area of Archaeological Priority and the south western part is the Beckenham Place Park Conservation Area.

Planning permission for regeneration of the park (west of the railway line) has been granted to you as the applicant in October 2017 (reference DC/16/099042). A minor material amendment was granted in relation to this approved scheme in February 2018 (reference DC/18/105082) to allow for landscaping changes and the construction of a raised mound garden. Numerous applications have also been made for approval of details reserved by conditions in 2018.

An application for a non-material amendment to the planning permission (reference DC/18/106155) was lodged in March 2018. The non-material amendment was sought to allow the following amendments to the approved scheme and conditions applying under the planning permission:

1. Changes in lake design - additional 1m of depth, change in shore construction, to improve ecological and amenity quality of lake;
2. Amendments to planting and furniture within open space adjacent to the Homestead building and proposed cafe;
3. Raising of level of parking area by up to 0.5m, with associated additional mound screening between the road into the park and the parking area, and additional cutting and spreading of earth to the periphery of the car park as required to facilitate the rise in the level of the car park, for drainage and tree protection reasons;
4. Change in location of the southern-most vehicular access point into the car park, for tree protection reasons;
5. Change in location of cycle parking location and reduction in number of covered spaces from 26 to 8;
6. The construction of a longer, shallower ramp for wheelchair users between the toilet block and the Homestead and cafe and associated garden areas, for accessibility reasons;
7. Amendment of fence location near Southend lodge for internal access to the leafyard/park maintenance hub;
8. Slight location and level changes to paths to be constructed, to work better with contours and for tree protection reasons;
9. New connecting footpath to the north of the mansion;
10. Diversification of planting species in selected areas, for biodiversity/seasonal plant growth reasons;
11. Change at Braeside gate entrance from a gate to timber bollards;
12. Slight changes in contours to the south of the lake for safety and drainage purposes; and
13. Amendment to the proportions of wall-to-gate within the structure opposite the main entrance to the parking area.

This application was withdrawn by you on 16/04/18 based on our position that the proposed changes would not be accepted as non-material. This position was based on two components of the proposed changes:

1. Raising of level of parking area by up to 0.5m, with associated additional mound screening between the road into the park and the parking area, and additional cutting and spreading of earth to the periphery of the car park as required to facilitate the rise in the level of the car park, for drainage and tree protection reasons;
2. Change in location of cycle parking location and reduction in number of covered spaces from 26 to 8;

The remaining changes were considered to be sufficiently small in terms of scale and/or effect to be considered to be non-material.

The pre-application meeting was requested to work through the two issues which were the reasons for the non-material amendment not being granted.

Your proposal

The proposal has not yet changed in design; rather, the purpose of the meeting was to discuss and work through potential design changes which would be considered to be non-material.

Feedback from and following meeting

The following feedback was provided either at the meeting, or is provided based on further discussions between officers:

1. The proposed change from 26 to 8 dry and secure cycle spaces is considered to be non-material based on the justification information provided following the withdrawal of the non-material amendment application, subject to there being at least 26 cycle spaces provided in total AND a review mechanism regarding the provision of dry and secure cycle spaces (i.e. if visitor/staff demand for dry cycle spaces increases in the future) is incorporated into the Travel Plan to be approved for the development. Commitment to this will need to be documented in a revised future non-material amendment application.
2. The proposed Cellweb construction methodology within the root protection zones of trees, as per the submitted pre-application documents, is acceptable to Council's Tree Services Manager.
3. 'Feathering' and gentle tapering of soil to the top of the proposed mounds to the north, south and west of the approved car park will render those mounds illegible as an artificial introduction to the landscape.
4. The most significant issue is the proposed mounding within root protection zones of trees to be retained, immediately to the east of the approved car park between the car park and the access road into BPP.
5. The mounds here are clearly geometrical/engineered in profile and form, and of a height to read as an obvious artificial introduction to the landscape and park setting near listed buildings, to the extent that they may have the opposite of the intended effect – drawing attention to them and the car park which the mounds are intended to screen. An introduction of clearly artificial geomorphology within the park goes against the grain and purpose of the regeneration project which is centred on restoring the park to its historic vegetative cover and geomorphic composition (which was eroded by the construction of a golf course in the late nineteenth/early twentieth century).
6. The planting of an understory/shrubs in strategic locations within the park leading up to the eastern edge of the car park was discussed as one solution to provide potential screening. This could be implemented near the 'Y' junction of the footpath and access road from the north-east leading to this location (immediately north of the pleasure grounds/Homestead).
7. Further ornate planting opposite the car park on the eastern side of the access road was suggested as a potential design change, to set focus on that component of the park setting rather than the car park, when travelling towards the car park from the north/north-east.
8. Removing kerbs within the car park was suggested, to reduce the 'urban' sense of place that is generated by such hard surfacing in this parkland setting.
9. Planting within the car park and on lower, gentler-sloping mounds could better link up to pedestrian routes and proposed planting on the eastern side of the access road, to soften the introduction of any mounds.
10. The mounds could be reversed in profile i.e. have the steeper side closer to the car park to allow for a gradual grade slope down to the access road, which reduces the conspicuousness of the mound and could potentially facilitate planting on the gentler slope.
11. The current coach parking/drop off/pick-up area can be relocated. The preference would be that the parking space is managed (and tweaked in design and extent as necessary to allow coach movements – we would need to review changes of this nature) so that coach trips are during off-peak, low-parking demand times and can be accommodated within empty parking space. This could be formalised either through the parking management plan (subject of condition 25 of the planning permission), or markings/signage within the carpark.
12. Alternatively to this, the coaching bay could be moved south. A small pull-in bay (i.e. the coach may still block a part of the 'live lane') past the bollards could be acceptable, given the very low vehicular traffic volumes (park maintenance vehicles only) and the low frequency of coach movements. This should be constructed of a sympathetic material to a parkland setting i.e. whitewashed/sand-coloured gravel, with minimal but clear signage that it is for coach parking/drop off/pick-up only.
13. Relocating the coach bay from its current location would free up space in front of the proposed mounds to the east of the car park. This could be used to construct lower

mounds, with more gentle slopes which could be planted, which would substantially improve the visitor experience to this location of the park. This location is an important meeting point of numerous proposed community facilities, commercial activities, and an expected area where recreational users of the park will gather. As such, it is extremely important that the treatment of the eastern edge of the car park be extremely well executed in terms of an appropriate parkland/historic character fit as part of the new park experiences to be made available with the approved regeneration scheme.

Conclusion

As outlined above, it is considered that there are a number of amendments/additional mitigation measures which could be incorporated into the plans. Collectively the changes could result in non-material amendments to the scheme. There are numerous changes outlined however and the applicant is also encouraged to explore the feasibility of any other changes which address the significant issue discussed in points 3 and 4 above. It is stressed that this is a sensitive site and the location of the design issues one of the most sensitive locations within the context of a sensitive site.

Officers welcome the opportunity to discuss these proposals at this stage of the process and would recommend that the applicant continue to engage in pre-application discussion with the planning department as the scheme progresses. This can be carried out via email to Vincent Murphy as the contact person in the first instance.

Yours sincerely



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