

Planning Statement

February 2026



Crystal Palace National Sports Centre

Proposed Refurbishments and Enhancements

Planning Statement

February 2026

Tibbalds Planning and Urban Design

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1. Introduction

- 1.1. This Planning Statement has been prepared by Tibbalds Planning and Urban Design, on behalf of the Greater London Authority ('the Applicant') in support of a full planning application and application for listed building consent for the redevelopment of the Crystal Palace National Sports Centre (CPNSC) which forms the application site (the 'Site'). The Site comprises of various sporting facilities within a parkland setting that are in need of refurbishment and enhancement to continue the Site's rich sporting legacy.
- 1.2. The Greater London Authority (GLA) have a long leasehold on the Site from the London Borough of Bromley and propose a series of interventions and improvements to sporting facilities at the Site. As set out in detail in the Design and Access Statement, the project vision is to revitalise the National Sports Centre and the Stadium as an open, welcoming and sustainable sporting campus that respects its heritage while transforming its ability to serve future generations. In doing so the proposed development will:
 - Protect and celebrate the heritage value of the listed National Sports Centre Main Building and landscape, ensuring all interventions enhance legibility, architectural clarity and the original design intent of the 1964 building and its setting.
 - Create a modern, inclusive and accessible sports environment, removing barriers to participation and ensuring that facilities meet contemporary accessibility, safeguarding and equality standards.
 - Re-establish Crystal Palace as a regional centre of sporting excellence, capable of hosting training, competition and community programmes across aquatics, athletics, field and court sports, together with new activity types.
 - Improve the operational efficiency and long-term sustainability of the complex, incorporating low-carbon design principles, energy efficient upgrades and improved public realm connections.
 - Reconnect the site with the wider park, strengthening the relationship between sport, landscape and public amenity through sensitive design interventions, wayfinding, landscape repair and improved permeability.
 - Secure the legacy of Crystal Palace as a place where history, sport and community meet restoring its role as a landmark civic asset and re-establishing a venue that is resilient, relevant and deeply rooted in the aspirations of its local and regional audiences.
- 1.3. The proposals are underpinned by a 'One Park' vision, fully cognisant and working alongside the enhancements being brought forward by London Borough of Bromley and the Crystal Palace Park Trust within the Park Masterplan. This application is submitted as a full planning application to demonstrate how the proposals have been developed together to ensure a comprehensive and coordinate approach. An accompanying application for listed building consent has been submitted for relevant internal and external works to the National Sports Centre Main Building which is Grade II* listed.
- 1.4. The resultant applications propose a series of interventions that rationalise and decluttering the Site around the three themes of heritage, sport and sustainability as summarised in Section 4 (Development Proposals) of this Statement and more fully in the Design and Access Statement.
- 1.5. In accordance with the principles of the National Planning Policy Framework (NPPF 2024, Section 4), local guidance and good practice, the CPNSC development proposals have been subject to pre-application engagement with key stakeholders.
- 1.6. The Applicant has engaged with residents, user groups, businesses, sporting bodies, the Local Planning Authority (LPA), Historic England and a range of other stakeholders. The development has also been presented to the Bromley Design Review Panel. Central to this has been a positive working relationship between the Applicant, LPA and key stakeholders. This has facilitated a series of meetings allowing constructive discussion of the emerging scheme and key issues. The application has positively responded to this engagement and the submitted Design and Access Statement describes the design evolution of the proposals. Commentary on the community consultation process is provided in the submitted Statement of Community Involvement.
- 1.7. The purpose of this Planning Statement is to set out how the proposed development accords with local and national planning policy. Accordingly, this Statement:
 - 1 Summarises pre-application and stakeholder engagement to date.
 - 2 Describes the Site and its surroundings.

- 3 Describes the proposed development.
 - 4 Identifies and addresses the key planning policy considerations.
 - 5 Provides conclusions.
- 1.8. In particular, this Statement should be read in the context of the NPPF which states (para. 11) that planning decisions should apply a presumption in favour of sustainable development and approve development proposals that accord with an up-to-date development plan without delay.
- 1.9. This Statement draws upon and should be read in conjunction with the following information forming part of this full planning application and, as relevant, the application for the listed building consent, the scope of which has been agreed with the LPA:
- Planning and Listed Building Consent Application Form and Certificates
 - Community Infrastructure Additional Information Form
 - Site Location Plan and Application Drawings
 - Design and Access Statement
 - Access and Inclusive Design Statement
 - Air Quality Impact Assessment
 - Arboricultural Impact Assessment Report
 - Archaeological Desk-based Assessment
 - Biodiversity Net Gain Report and Matrix
 - Construction and Environmental Management Plan
 - Construction Logistics Plan
 - Preliminary Ecological Assessment and Surveys
 - Energy and Sustainability Statement
 - Fire Statements (Main Building, Indoor Sports Hub and Jubilee Stand)
 - Flood Risk Assessment
 - Heritage Statement
 - Lighting Assessment
 - Noise and Vibration Impact Assessment
 - Site Investigation Report
 - Statement of Community Involvement
 - Structural Survey and Civil Engineering Report
 - Surface Water Drainage Assessment
 - Transport Assessment
 - Ventilation / Extraction Details
- 1.10. The proposed development has been subject to an environmental impact assessment screening process. The resultant screening opinion issued by the London Borough of Bromley as 'Competent Authority' (reference 25/04506/OTH dated 18 November 2025) confirms that the proposals will not give rise to any potentially significant environmental effects and that no environmental impact assessment is required to accompany this application.
- 1.11. This Statement identifies how the proposed development responds to, and meets, local and national planning policy objectives by delivering an evolution in the sporting facilities of the CPNSC, bringing them up to modern standards whilst ensuring there is access for all and integrating with their wider setting withing Crystal Palace Park.

2. Pre-application Engagement

- 2.1. This application has been subject to extensive pre-application engagement with the community, key stakeholders and statutory bodies and these discussions have informed the submitted proposals. The community consultation is covered in the Statement of Community Involvement (SCI) and the design evolution of the scheme in response to engagement in the Design and Access Statement (DAS).
- 2.2. As set out in the SCI, a series of community and engagement events have taken place on the emerging proposals since 2018 in a variety of formats. This has included online engagement, community workshops and conferencing, youth engagement and exhibitions. Collectively, these have sought to engage all with a cross-section of stakeholders. with a number specifically focussing on engaging with harder to reach groups. Most recently, a 'meet the construction team' event took place on 9 July 2025 and the Applicant held two drop-in public exhibitions at the CPNSC Site on 22 October 2025 and 15 November 2025. The latter events presented the emerging scheme with the applicant team on hand to explain the scheme and answer queries. A questionnaire was also made available for feedback and allowed comments. This most recent activity is supported by a dedicated project website.
- 2.3. To inform the development of the scheme and ensure it is as accessible and useable to all, as well as meeting sporting requirements for everyday use, training and competing, the Applicant has, and will continue to, engage with user groups and sporting bodies. A full description of this engagement to date is contained within the SCI
- 2.4. In terms of planning specific engagement, earlier iterations of the scheme involved pre-application discussions with the London Borough of Bromley (LBB) as LPA and Historic England (HE) and this most recent scheme has responded to that earlier advice. Most recently, the Applicant has engaged with the LPA (including design, heritage, drainage and transport officers), Sport England, HE, the Twentieth Century Society (C20) and London Parks & Gardens. The emerging scheme was also presented to the Bromley Design Review Panel and to LBB Members. A summary of this planning engagement is provided below and in depth commentary on the heritage related pre-application engagement is contained within the Heritage Assessment:

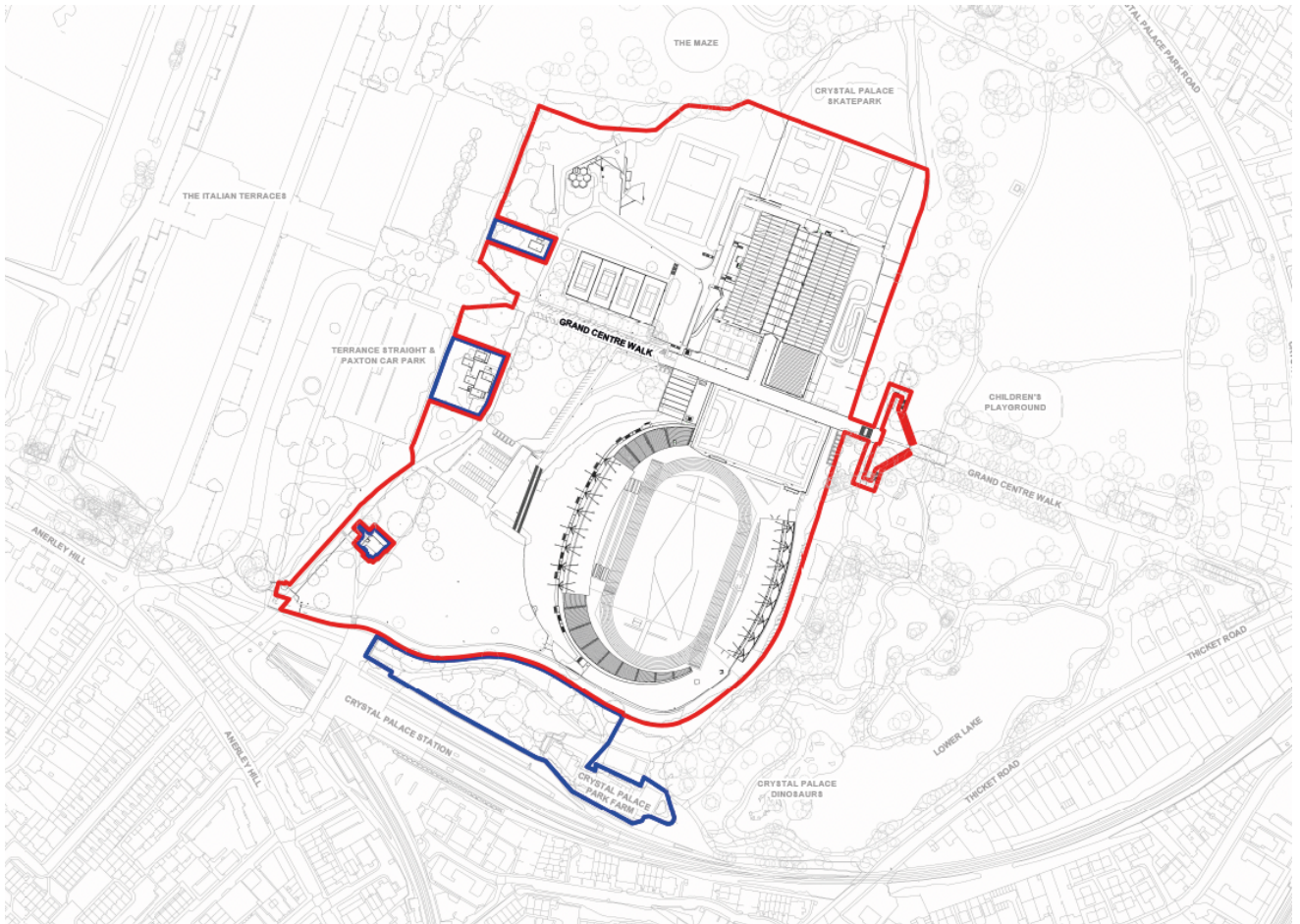
Consultee	Date (all 2025)	Summary
Local Planning Authority	12 August	Pre-app1 with Planning, Design and Heritage Officers to discuss the emerging scheme with a focus on the Main Building
	20 August	Meeting with Planning and Drainage Officers to present and discuss the draft drainage strategy
	28 August	On-site meeting with Planning, Design and Heritage Officers to better understand the Site and emerging scheme
	7 October	Meeting with Planning and Transport Officers to present and discuss the draft movement strategy
	24 November	Pre-app2 with Planning, Design and Heritage Officers to present the updated scheme and responses to earlier feedback, more focused on the stadium and external areas
	19 December	On-site presentation of scheme model and images to further respond to earlier feedback
LBB Members	25 November	Presentation of pre-application scheme to Development Control Committee Members and Local Ward Members followed by questions and answers
Bromley Design Review Panel	9 October	Presentation and discussion of the pre-application scheme to the Design Review Panel
Sport England	24 July	Introduction to and presentation of the emerging designs
	19 August	Follow up meeting to present updates following initial feedback
	6 November	Follow up to present outcomes of discussions with national governing bodies and present the proposed plans for submission
Historic England	20 June	On-site overview of the emerging proposals
	17 July	On-site discussion and update on key heritage matters
	31 July	Further on-site discussion and update on key heritage matters
	21 November	On-site walkover to review samples and proposals for restoration
Twentieth Century Society	15 July	On-site overview of the emerging proposals
London Parks & Gardens	18 November	Presentation of pre-application scheme to the Gardens Trust's Planning and Conservation Working Group followed by questions and answers

2.5. Overall, the pre-application engagement undertaken has benefited the proposed development through ensuring that they have been subject to critical thinking, allowing alternative options to be explored and have evolved response to design and user feedback. This process reflects best practice and planning guidance at all levels.

3. Development Site and Surroundings

The Application Site

3.1. The Application Site extends to 15.47 hectares and comprises the Crystal Palace National Sports Centre (CPNSC). A full site description and analysis is provided in the Design and Access Statement.



3.2. The CPNSC was built in 1964 as one of five national sports centres. It was the first multi-sport facility of its kind in Europe, and it remains an important strategic sports facility for London. It comprises a series of buildings and sports facilities within landscaped grounds with a topography that falls from west to east across the Site. The buildings are served by a series of site vehicular and pedestrian access routes and car parks. The Site comprises:

- **The Main Building** - a Grade II* listed multi-sport facility constructed in 1964 and housing a range of sports facilities including a 50m pool and diving pool with spectator seating, a multi-sport arena with bleacher seating, a gym and fitness suite, flexible studio spaces, squash courts, wet and dry changing, café, soft play and associated offices/storage space. The 50m pool and diving pool have been closed since 2020 due to structural issues.

Linked to the Main Building is a 25 metre swimming pool building of later construction. This building houses a 25m training pool in a double height space, a dance/fitness studio and office/educational floorspace. This formed a later addition to the estate in the 1976 and is served by its own plant.

The CPNSC is served by a centralised energy centre that is powered by natural gas and located on the west side of the Main Building. The primary gas supply directly serves a Combined Heat and Power (CHP) engines and boilers. A network of site-wide infrastructure distributes this heating and hot water to the majority of buildings within the Site.

- Indoor Sports - an elevated walkway, the Grand Centre Walk, functions as an access route to the Main Building, this is also referred to as the 'Paxton Axis'. Following its construction in 1964, the undercroft was converted into an enclosed indoor athletics track consisting of a 60m running track, long jump track and pit, throws net and high jump.

Indoor sports also includes weightlifting, climbing and supporting sporting facilities. The undercroft area is linked to the building south west of the walkway which connects to the West Stand of the Stadium. This building has been stripped out and is currently unused, but previously included a bar, restaurant and indoor 5-a-side football pitch.

- The Stadium - The Stadium has capacity of 15,500 and comprises the West Stand, Jubilee Stand, athletics track and in-field. Forming part of the original design, the West Stand comprises a concrete seating terrace providing 10,500 seats partly enclosed by a steel canopy roof. The stand sits within the natural site topography and contains toilet blocks below the seating, changing rooms for the stadium, a two-storey commentary box, two VIP boxes and a ticket office. The Jubilee Stand was completed in 1977 and provides 5,000 seats. It is two-storey with pre-cast concrete raked seating terraces below a steel canopy. The building contains floorspace leased to various organisations, as well as toilets and circulation space serving the Stadium.

The athletics track is 400m and has recently been repaired. Other athletics facilities include two double long-jump runways and landing pits, a double high-jump runway, a throwers net and an infield. Temporary floodlighting is currently used as the permanent floodlights were removed in 2022. A scoreboard is located at the north end of the stadium.

- Outdoor Sports and Landscaping - the Site includes various outdoor sports facilities comprises four tennis courts (two currently converted to padel courts), a sand-based multiuse football/hockey pitch, beach volleyball courts, five-a-side football artificial turf pitches and a grass pitch primarily used for football.

Sporting facilities are set within Crystal Palace Park and the Site encompasses various soft and hard landscape features. The main areas of soft landscaping are to the west of the Athletics Stadium, also known as 'Paxton Hill' and the area to the west of the Main Building. Both are predominantly grassed areas. Soft landscaping, including mature trees line parts of the Grand Centre Walk and Ledrington Road.

In addition to the east/west Grand Centre Walk, the Site includes part of Ledrington Road and other surfaced routes serving the Park and CPNSC. Vehicles access the parking on-site, which is provided in the West Stand Car Park and along the north sides of the Grand Centre Walk and Ledrington Road.

At the north west corner of the Site is a group of buildings collectively known as the 'The Lodge'. The twelve storey Lodge Tower and single storey ancillary buildings form part of the original 1964 complex and originally provided athlete accommodation and supporting facilities ancillary to the main sports use of the Site. They are now vacant.



Site Surroundings

- 3.3. The CPNSC is located within, and forms a key component of, Crystal Palace Park in the London Borough of Bromley (LBB). The Site is located close to the borders of the Boroughs of Southwark, Lambeth, Lewisham and Croydon, and serves the residents of all five Boroughs and beyond. GLA's 'ownership' of CPNSC and the Site is under a 125-year lease from LBB. Sporting facilities at CPNSC Site are currently operated by Greenwich Leisure Limited.
- 3.4. The Site is wholly within Crystal Palace Park, an 80ha public park which is also owned by LBB and operated under a lease by Crystal Palace Park Trust (CPPT). The Park is predominantly open in nature, is a Grade II* Registered Park and Garden, and is designated as a Conservation Area and Metropolitan Open Land in the Development Plan, both of which also cover CPNSC.
- 3.5. The Park also contains several statutorily listed structures. Outline permission for the comprehensive regeneration of the park was approved in 2023 and is being built out pursuant to subsequent reserved matters approvals. These provides important context for the refurbishment of CPNSC (see Planning Context below).
- 3.6. Immediately to the west of the Application Site boundary, but within the GLA's leasehold interest, are six detached brick houses off Ledrington Road that also form part of the original 1964 complex. These were designed as staff houses ancillary to the CPNSC and continue to be rented out on assured short-hold tenancies. For the avoidance of doubt, these properties are outside of the Application Site and no works are proposed to them.
- 3.7. In terms of accessibility, the Site primarily has a public transport accessibility level (PTAL) of 1b to 3. It is served by both Crystal Palace Station and Penge West Station, approximately 400 metres and 630 metres from the centre of the Site respectively. Numerous bus stops surround Crystal Palace Park and are within walking distance. Bus services include 122, 202, 227, 363, 450, N3 and N63. The wider Park is therefore has good public transport accessibility. Pedestrians and cyclists can access Crystal Palace Park from multiple entrances spread across its boundaries. The entrances closest to the Site are on Thicket Road, Anerley Hill and Crystal Palace Park Road. Vehicular access is currently available via the entrances on the same three roads, connected to car parks within the Park. Full details are provided in the Transport Assessment.

Planning Context

- 3.8. The principle of the redevelopment of Crystal Palace Sports Centre is referenced in the Bromley Local Plan, where it is stated that the Council will work with stakeholders to ensure that proposals support the sub-regional role of the Crystal Palace Strategic Outer London Development Centre (CPSOLDC). Local Plan Policy 111 CPSOLDC states that:

“The Council will expect any proposals for the Crystal Palace Strategic Outer London Development Centre (SOLDC)... to maintain, enhance and support the unique existing strategic cultural, sports, tourism and leisure functions of the Crystal Palace Park”

And that:

“[Any development proposals] will be expected to contribute to and/or strengthen as appropriate the sub-regional importance of the SOLDC having regard to its specialist identified strengths whilst maintaining and improving the park’s open setting and the visual and landscaping amenities which inform its character and that of the key heritage assets within its boundaries.”

- 3.9. To support this objective, the LBB are working with the CPPT to bring forward a regeneration plan for the Park, referred to here as the ‘Park Masterplan’. In tandem, the GLA are continuing to work with both LBB (as landowner) and CPPT to ensure coordination and collaboration between all parties and so that these proposals for CPNSC sit comfortably within the Park Masterplan.
- 3.10. The Development Plan for the Site, including designations and relevant policies, and relevant ‘material considerations’ are set out at Section 5 (Planning Policy Framework) of this Statement and the heritage context with the Heritage Assessment. In summary however, in addition to the CPSOLDC, the Bromley Local Plan identifies the following designations for the Site: Metropolitan Open Land, Green Chain (South East London Green Chain), Site of Importance for Nature Conservation, Crystal Palace Conservation Area and Historic Park and Garden and Archaeological Priority Area. The Site is also within the Crystal Palace, Penge & Anerley Renewal Area.
- 3.11. The principal planning application history of relevance to this application comprises the outline planning permission for the phased regeneration of Crystal Palace Park (excluding the GLA land interest), which is being brought forward through reserved matters applications, and the previously approved application for the CPNSC Site.
- 3.12. Outline planning permission for the Park Masterplan was granted to LBB and CPPT on 16 March 2023 (LBB reference 20/00325/OUT, as updated by subsequent non-material amendment approvals) for:
- “Outline application with all matters reserved except highways access for comprehensive phased regeneration of Crystal Palace Park. This will include: 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. (amended description)”*
- 3.13. In summary, the permission includes the conservation and repair of some of the heritage assets within the Park, landscaping and access works, the development of community and education spaces, a cultural centre and information centres and park maintenance facilities. Up to 210 new residential dwellings are also proposed as enabling development to the other works.
- 3.14. This is a phased development for which outline approval was granted with all matters reserved other than highway accesses. LBB have secured reserved matters approval for development relating to the tidal lakes and

maintenance depot (Site A) and the Italian Terraces (Site B) (LBB reference 24/00478/DET dated 27 June 2024), the approved description of development states:

“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.”

- 3.15. LBB have also discharged relevant planning conditions to the outline permission and works are underway. This demonstrates LBB and CPPT commitment to the proposals and enhancements to the Park that can be complemented by the CPNSC proposals.
- 3.16. A reserved matters application for details of the residential dwellings has been submitted by Clarion Housing Association Limited in October 2025 (LBB reference 25/04937/RES). The application proposes 138 dwellings at the Rockhills site and 64 dwellings at the Sydenham Villas site, these sites are located on the north and east fringes of Crystal Palace Park, physically separate from the CPNSC Site. This application is pending determination at the time of this application submission.
- 3.17. An earlier outline masterplan application was allowed on appeal for the entirety of Crystal Palace Park in 2010 (LBB reference 07/03897/OUT). This application was submitted by the London Development Agency for the whole of Crystal Palace Park, thereby encompassing the CPNSC, for:

“Comprehensive phased scheme for landscaping and improvement of Park comprising demolition of and alterations to existing buildings and structures including removal of existing hard surfaces; changes of use including of part of the caravan site to public open space and museum to park rangers base; erection of new buildings and structures for various uses including museum/ park maintenance facilities/ community facility/ information kiosk/ greenhouses/ retail kiosks/ cafes/ toilets/ classroom/ children’s nursery/ treetop walk/ college and up to 180 residential dwellings; erection of new regional sports centre including indoor swimming pool; alterations to ground levels with new pedestrian paths/ vehicular access roads/ car park/ highway works/ water features together with associated and ancillary works/ plant and equipment (Part Outline/Part Full Application).”
- 3.18. The planning application was accompanied by an application for conservation area consent for relevant works, which was also approved on appeal (LBB reference 07/03906/CAC dated 26 April 2010).
- 3.19. Reserved matters details for the layout of the development were submitted in October 2010 (LBB reference 20/03619/DET), however, this application has not been determined and the scheme has not been implemented.
- 3.20. Whilst the 2010 application has largely been superseded by a combination of the 2023 Park Masterplan for the wider Park and this application for the CPNSC, it remains a relevant material consideration for the principle of improvements to the CPNSC and the removal of The Lodge and 25m swimming pool building from the Site. It is therefore referenced in Section 6 Planning Assessment of this Statement as appropriate.
- 3.21. ‘Prior Approval’ for demolition of two unused ticket booths at the east end of the Grand Centre Walk was requested and granted by LBB on 25 November 2025 (LBB reference 25/04849/NOT). The associated Officer Report confirmed that these structures are not listed.
- 3.22. Overall, the planning context for this application in terms of policy and planning history is that there is recognition of the need, and support for, enhancement of the CPNSC to maintain and enhance its strategic sport and leisure function and the need for a consider planning balance to be undertaken in decision making.

4. Development Proposals

- 4.1. The development proposals at the Crystal Palace National Sports Centre (CPNSC) comprise a series of refurbishments and enhancements that fit into the Park Masterplan and will deliver the next chapter in the Site's rich sporting history for all. The proposals are derived from the three overarching themes of heritage, sport and sustainability and will deliver improvements to all three through the rationalisation and decluttering of the Site.
- 4.2. As set out in Section 2 Pre-application Engagement of this Statement, pre-application discussions have taken place with the LPA and other key stakeholders. These discussions have been important in shaping the development proposals.
- 4.3. A full explanation of the scheme and its design principles is provided in the Design and Access Statement and summarised in this Section of the Planning Statement. A summary of existing and proposed floorspace and sporting facilities is included at the end of this Section. It is intended that works at the Site will start with those to the Main Building and The Lodge.

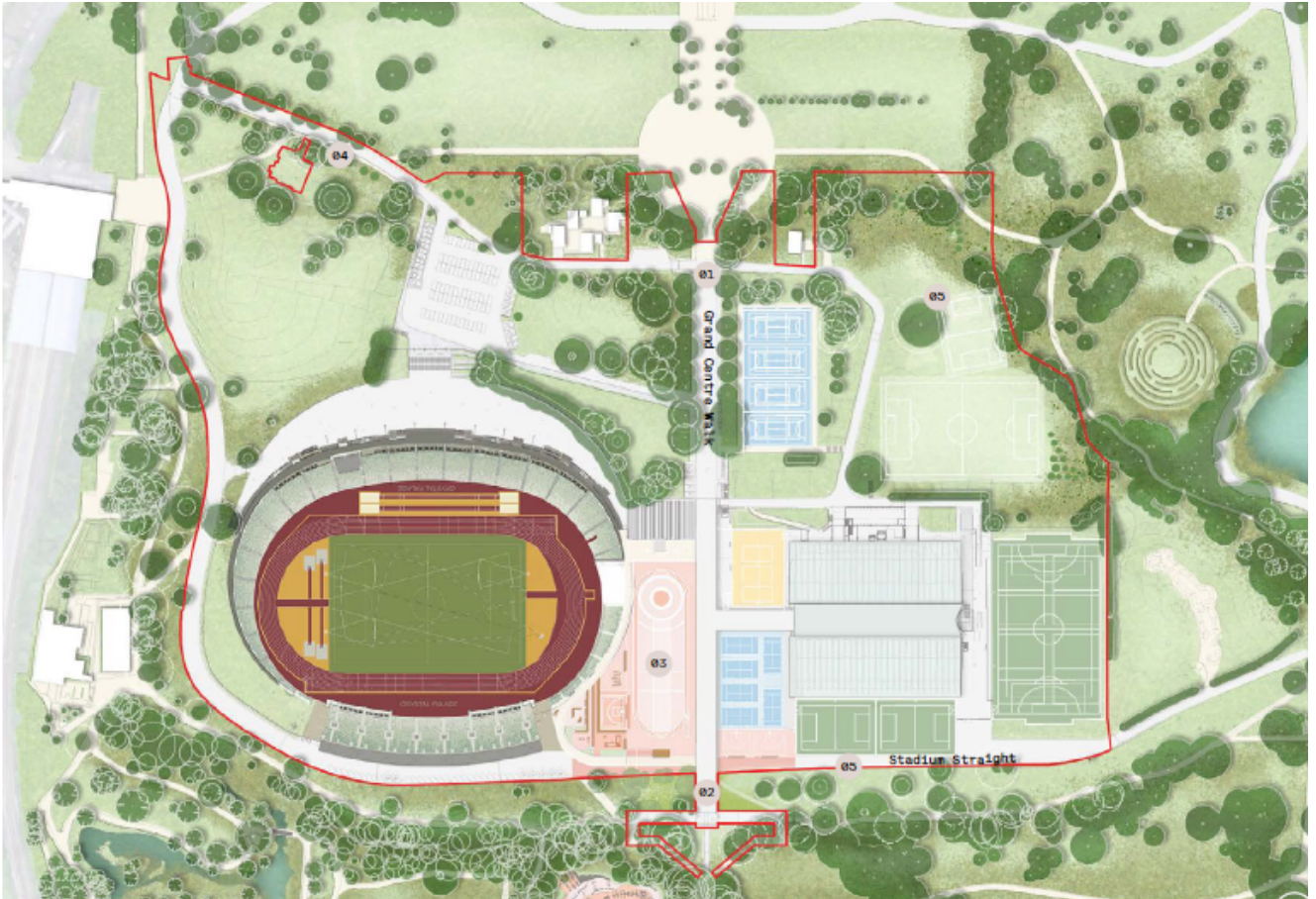
- 4.4. The proposed description of development is:

"Full planning application for the refurbishment and enhancement of Crystal Palace National Sports Centre comprising:

- Refurbishment of the Main Building including external alterations and replacement energy centre.*
- Refurbishment and external alterations to the indoor athletics, weightlifting and former bar and 5-a-side areas.*
- Refurbishment and external works to the Athletics Stadium including erection of a new walkway and seating.*
- New and enhanced external sports facilities including a sports plaza, courts and pitches.*
- Demolition of the 25m pool building and Lodge Buildings.*

The above to be accompanied by associated works to include improvements to public routes, access, parking landscape and ancillary works."

- 4.5. The CPNSC Main Building is Grade II* listed. Therefore, Listed Building Consent is also sought for the internal and external works to the Main Building and any works that would have a direct physical impact on the principal listed building itself. This is limited to the demolition of the 25m pool building where there is a small link connecting to the Main Building and upper level balustrades to the Grand Centre Walk where there is an attachment to that principal listed building. However, it is important to note that the spot listing of the CPNSC Main Building specifically states that the listing is not intended to include either the 'raised concourse' (the Grand Centre Walk) or 'training pool set separately underneath it' (the 25m swimming pool building).



One Park Masterplan

4.6. The proposals have been developed to complement the wider Crystal Palace Park and the phased enhancements that are being undertaken by CPPT as part of the Park Masterplan. The objectives of the CPNSC scheme are:

- One Park; Integration of the CPNSC with the wider CPP, removing barriers to movement and celebrating the unique setting of the Main Building within a mature parkland setting.
- Respecting the architecture; Restoring the iconic buildings, both inside and out.
- Sports for all; Modernising facilities to current standards to provide a diversity of sports with high quality facilities that are accessible.

Landscape and Movement

4.7. The CPNSC development presents a number of opportunities to support the 'One Park' objective and better integrate the CPNSC with the Park through the removal of current barriers, provision of new public facilities and restoration of parkland. Accordingly, the key objectives of the landscape proposals are:

Improve the condition and connection of the Grand Centre Walk

4.8. Save for necessary accessible parking (five spaces), existing parking will be relocated away from the Grand Centre Walk. Whilst this will remain a shared route, it will become more pedestrian friendly as a result. Surface treatments will tie in with those being used to the east of the Site by the CPPT. Existing mature trees will be retained and managed to improve sightlines.

4.9. On the elevated walkway itself, heritage-led designed balustrades and handrails will be provided and seating added, alongside resurfacing.

Restore areas of the Site to parkland and remove barriers to between the CPNSC and the wider park

- 4.10. Opportunities will be taken to restore parkland. Most notably, the demolition of The Lodge on the norther part of the Site allows this area to become 4,820sqm of parkland. Proposed planting across the Site comprises a mix of swale/SUDS, pollinator, structural and native scrub planting, amenity grassland and tree planting.
- 4.11. Fences and other barriers will be removed where possible, for example around the existing location of the artificial football and hockey pitch and along the eastern boundary of the Site.
- 4.12. Overall, the proposals will result in an increase of 14,504sqm of publicly accessible land, which is 9% of the Site.

Improve pedestrian access, accessibility and experience and improve access to sports

- 4.13. The main intervention is a new accessible pedestrian connection that will be created as part of the completion of the Stadium bowl to improve the step free connection between the higher and lower levels of the Grand Centre Walk, as users enter or exit the Site to the east, from Penge West. Historically, the raised walkway has been disconnected from the lower park. The new route rises from the new Sports Plaza, follows the curve of the proposed seating within the Stadium, connects to the roof of the (refurbished) Indoor Sports Zone, and continues to the elevated walkway. It is approximately 146m in length and includes integrated seating at regular intervals to provide opportunities for rest. This new connection reduces the step free route from Penge West to the CPNSC Main Building from 1,090m to 320m.
- 4.14. There will be a new dedicated pedestrian route between Crystal Palace Station and the CPNSC by connecting existing footpaths with new pedestrian routes.
- 4.15. A new gateway space will be created at ground level at the eastern end of the Grand Centre Walk. Views will be opened up, feature lighting added and vehicular access controlled.
- 4.16. The access and movement principles of the proposals are detailed in the Transport Assessment, Design and Access Statement and Accessibility Statement and are focussed on promoting active travel and the use of public transport.

Creation of a new public space

- 4.17. A new publicly accessible Sports Plaza will be provided in place of the relocated artificial football and hockey pitch to the north of the Stadium. It will be a flexible space to facilitate various sporting and community uses and also celebrate the Site's sporting heritage. It will include spaces for formal and informal activities and be useable to a range of ages.

The Main Building

- 4.18. Within the Main Building, a comprehensive programme of refurbishment is planned to modernise and enhance the facility's core amenities. The key objectives for the Main Building and the key interventions to achieve these objectives are set out below.

Creating an accessible and inclusive centre for everyone

- Create a more rational and inclusive entrance sequence.
- Move the wet changing to level 01 creating level access from the wet changing to the pool surrounds.
- Remove the 25m building to provide all pool spaces on one level improving accessibility.
- Create more flexibility within the remaining three pool tanks to better provide for the facility demands of the catchment area by extending the teaching pool to 25m in length and adding floating floors.
- Providing access to the upper level of the Crystal Suite.

Improving the user experience using sustainable principles

- Improve the external fabric of the main building to create a more thermally efficient building contributing to reducing the operational energy of the building and provide better control of the temperature.
- Create an environmental division between wet and dry sports.

Restoring the Main Building to a pavilion in the park through a heritage led approach

- Removing the 25m pool building in its entirety to return the main building as a glass pavilion within the park setting.
 - Removing internal additions added after the building was constructed
- 4.19. Overall, the proposals for the Main Building include; significant repairs and upgrades to the existing pools, ensuring improved accessibility through the addition of a new wet changing facility with level access to the poolside; new lifts to enable step-free circulation to all floors, supporting inclusive access throughout the building; the selective removal of non-original features to open up and de-clutter the main entrance and interior walkways, restoring a sense of the original architectural clarity, and; sports spaces remodelled and reconfigured to better serve a range of athletic and community uses. Collectively, this will adapt the centre for modern expectations while respecting its historic character.
- 4.20. The redevelopment of the CPNSC also includes the introduction of a new energy centre. This facility is part of a broader scheme to refurbish and modernise the centre, ensuring its continued viability and environmental responsibility for future generations. The energy strategy for the Site is detailed in the Energy and Sustainability Statement and includes a series of methods to reduce carbon emissions in line with the London Plan energy hierarchy.
- 4.21. The Main Building will remain in sporting use, with ancillary facilities, and planning permission is therefore sought for the external works to the Main Building. Listed building consent is sought for all relevant internal and external works to the Main Building itself.

Indoor Sports Zone

- 4.22. The proposed 'Indoor Sports Zone' will result from a series of refurbishments and improvements to the buildings that sit underneath part of the elevated walkway and between this and Stadium. These areas currently house the indoor athletics area, weightlifting facilities and former bar and 5-a-side spaces. The scope of these works focus on modernising and enhancing these athletic and community amenities to meet contemporary standards and expectations. Key interventions comprise:
- New external envelope inboard of the existing perimeter.
 - External facade and roof upgrade.
 - A new cafe, reception and office areas.
 - Accessible indoor access from changing rooms throughout
 - Removal of existing staircases and replacement stair and lift core.
- 4.23. The resultant refurbished space will house indoor athletics, weightlifting and climbing with ancillary supporting uses including a café, offices, toilets and changing facilities and tenant rooms.
- 4.24. Collectively, these upgrades will improve the overall quality, accessibility, and versatility of these spaces, ensuring they better serve both sporting and wider community needs, while integrating them more cohesively within the broader refurbished site.

The Stadium

- 4.25. The proposed works seek to restore, complete and enhance the Stadium so that it can continue to operate as an internationally significant athletics venue. The key design objectives are to:
- Restore the Stadium's role as a national athletics venue capable of hosting elite and international competition.
 - Improve accessibility, circulation and user experience for athletes, spectators and staff.
 - Upgrade facilities while protecting and revealing the Stadium's heritage significance.
 - Support a clear event strategy, enabling safe, efficient and flexible operation for major athletics events.

- 4.26. These will be achieved through a series of interventions that focus on sensitively restoring and ‘completing’ the Stadium. The approach to the Stadium from the west will be improved through a new entrance gateway leading to a new ramp and restored stairs to the upper concourse. New accessible toilets will be provided at the upper level of the West Stand alongside new integrated wheelchair accessible viewing platforms. Existing seating and the control box will be restored to modern standards. The West Stand currently wraps around the south curve of the athletics track but stops at the start of the secondary 100m straight. This stand will be extended further around this bend, providing an additional 78 seats.
- 4.27. Seating will also be refurbished in the Jubilee Stand with new wheelchair accessible viewing areas added. Internally, spectator facilities and tenanted areas will be refurbished and modernised. Externally, the east façade will be replaced with a sympathetic design that incorporates improved thermal performance.
- 4.28. The new pedestrian connection between the Sports Plaza and walkway will be provided in tandem with the completion of the stadium bowl. This will create a greater sense of enclosure for events and significantly enhance the atmosphere. This will add 930 seats to the Stadium capacity.
- 4.29. Overall, as a result of the various interventions, the Stadium capacity will increase from to 15,453 to 15,968 (+515).
- 4.30. Other key interventions to the Stadium include: new athletics track surface; relocation of jumping and throwing facilities; four replacement floodlights (previous permanent floodlights were removed in 2022 due to safety concerns), and; removal of the outdated scoreboard from the north bend.

Outdoor Sports

- 4.31. The proposal will also comprehensively restore, upgrade and rationalise outdoor sports courts and pitches to maximise the efficiency and quality of provision across the Site. Existing outdoor sports facilities are well used but their condition and configuration no longer meet contemporary standards for performance, accessibility or durability. This limits their ability to support use at all levels.
- 4.32. The proposals include football and multi-sport pitches and tennis/netball, padel, beach volleyball and 3x3 basketball courts. A Sport England Playing Field Assessment is included within the Design and Access Statement, alongside a full description of the pitches and courts. Existing and proposed provisions is summarised in the table below within this Section of the Planning Statement, but in summary, the proposals will deliver inclusive and future-proofed qualitative and quantitative improvements in outdoors sports facilities at CPNSC.

Summary of Proposals

- 4.33. A summary of the resultant floorspace changes to buildings on the Site is shown in the below table. It should be noted that this includes internal alterations to some buildings that do not specifically require planning permission, however these form part of the overall improvements to the CPNSC and are included below for completeness and for consistency with the Design and Access Statement.

Building	Existing Floorspace (sqm)	Proposed Floorspace (sqm)	Notes
Main Building	17,007	17,523	Internal alterations
25m Swimming Pool	1,899	0	To be demolished
Indoor Athletics	3,251	3,203	Internal alterations and minor change to building line
West Stand Ticket Office	19	0	To be demolished
West Stand Toilets	0	28	New accessible toilets and baby change
Jubilee Stand	4,501	3,857	Internal alterations and change to ground floor building line
Stadium Bowl Completion	0	355	Storage area beneath Stadium bowl
The Lodge	2,854	0	To be demolished

4.34. In terms of sporting facilities, current and proposed provision is summarised below. It is important to note that all new or upgraded facilities will meet modern sporting requirements and that, for internal sporting provision in particular, there remains scope to use spaces flexibly in response to demand.

Sporting Facility	Existing	Proposed	Notes
Main Building			
Competition Swimming Pool	Not in use	50m pool	Flexible pool with boom and floating floor
Teaching Pool	Teaching pool	25m pool	Movable floor with interactive play
25m Pool	25m	Removed	Consolidated within other pools above
Diving Pool	Note in use	Restored	-
Sports Hall	x6 courts	x6 courts	Refurbished
Exercise Studios	x1 (189sqm)	x3 (371sqm)	-
Spinning Studios	x1 (64sqm)	x1 (121sqm)	-
Boxing	64sqm	121sqm	-
Squash	x2 courts	x2 courts	-
Dry Diving	378sqm	300sqm	Combined with gymnastics
Gymnastics	-	300sqm	Combined with dry diving
Fitness Suite	120 station	180 station	
Climbing	128sqm	-	Relocation to Indoor Sports Zone
Indoor Sports Zone			
Indoor Athletics	60m track, long jump, high jump and throwing cage	100m track, long jump, high jump and throwing cage	New track to include new run-off area to improve usability
Weightlifting	x3 rooms (246sqm)	x2 rooms (221sqm)	-
Climbing	-	621sqm	Relocated from Main Building
Football 5-a-side	1 pitch	-	Relocated externally
The Stadium			
Athletics Facilities	400m track, throwing and jumping facilities	400m track, throwing and jumping facilities	Refurbished and pole vault, shot put, throwing cage javelin runway relocated
Football Pitch	x1 grass pitch	x1 full size grass pitch	Incorporated within central grassed area, current pitch is undersized
Outdoor Sports			
Multi-use Pitch	x1	x1	To modern surface and size standards (current pitch is undersized)
Football Pitch	x1 junior grass x1 3G undersized x2 3G 5-a-side	x2 junior grass (u7 and U13) x2 3G 5-a-side	Grass pitches will include improve drawing and artificial pitches to modern standards
Tennis	x2 courts	x4 courts	Padel courts returned to tennis
Padel	x2 courts	x6 courts	Existing courts and adapted tennis courts
Beach Volleyball	x2 full courts and x3 training courts	x4 full courts and x2 training courts	Reconfigured
Basketball	-	x3 3x3 courts	Includes one court with Sports Plaza

4.35. As set out comprehensively in the Design and Access Statement, the proposed works deliver a coordinated, heritage-led refurbishment and enhancement of the Crystal Palace National Sports Centre, securing its long-term role as a nationally significant sporting venue while meeting contemporary standards for accessibility, sustainability and inclusive use.



5. Planning Policy Framework

5.1. The planning policy framework for the proposed development is set through policy and guidance at national, regional and local level. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. The adopted Development Plan for the site comprises the

- 1 London Plan (LP 2021).
- 2 London Borough of Bromley's Local Plan (BLP 2019).

5.2. Both the GLA (as strategic planning authority) and LBB are in the process of bringing forward new local plans. Both are at an early stage with drafts currently anticipated in 2026. They are required to go through consultation and an examination in public prior to adoption. The GLA has a timetable for the emerging London Plan. In May and June 2025, a consultation period was held on a 'High level document', which set out the key ideas that a new London Plan may consider. A draft emerging London Plan document is expected in the summer of 2026, with the examination process taking place in the end of 2026 / early 2027. The emerging London Plan is expected to be adopted in 2027. LBB are performing a Local Plan Review that is currently in Regulation 18 consultation with the aim to be adopted in 2027.

5.3. The National Planning Policy Framework (NPPF) is an important material consideration and is supported by guidance in the National Planning Practice Guidance (NPPG). At the time of submission of this application, an updated draft NPPF has been released for consultation between 16 December 2025 and 10 March 2026.

5.4. At regional (London) and local (Bromley) levels, the GLA and LBB have a number topic specific supplementary planning documents or guidance (SPD/SPGs) as well as London Plan Guidance (LPGs) that are also material considerations, including:

GLA:

- Air Quality Neutral LPG (2023)
- Air Quality Positive LPG (2023)
- Urban Greening Factor LPG (2023)
- Circular Economy Statements LPG (2022)
- Energy Assessment Guidance (2022)
- Sustainable Transport, Walking and Cycling LPG (2022)
- Whole Life-cycle Carbon Assessments LPG (2022)
- 'Be Seen' Energy Monitoring Guidance (2021)
- Energy Planning Guidance (2020)
- Social Infrastructure SPG (2015)
- Accessible London SPG (2014)
- Character and Context SPG (2014)
- Control of Dust and Emissions in Construction SPG (2014)
- Play & Informal Recreation SPG (2012)
- Planning for Equality and Diversity in London SPG (2007)

LBB:

- General Design Principles SPG (2004).
- Biodiversity Action Plan (2021-2026).

5.5. The table on the following pages sets out the framework of key planning policies and guidance that the CPNSC scheme is assessed against, as appropriate, in the following sections of this Planning Statement. It is not

intended to repeat the policies or guidance in full and key tests or guidance is identified on a proportionate basis by topic.

5.6. The BLP identifies the following planning designations for the Site:

- Metropolitan Open Land
- Green Chain (South East London Green Chain)
- Site of Importance for Nature Conservation
- Conservation Area
- Historic Parks and Garden
- Archaeological Priority Area
- Crystal Palace Strategic Outer London Development Centre (SOLDC)

5.7. The Site and the wider Park and neighbourhood are also with the Crystal Palace, Penge & Anerley Renewal Area.

Topic	Sub Topic	Development Plan		Material Considerations
		London Plan 2021	Bromley Local Plan 2019	
Principle of Development	Location	GG2 Making the best use of land Prioritising sites that are well-connected by public transport.	Policy 111 Crystal Palace Strategic Outer London Development Centre Proposals will be expected to maintain, enhance and support the unique strategic cultural, sports, tourism and leisure functions of CPP.	NPPF Chapter 11
	Regeneration	SD10 Strategic and Local Regeneration Boroughs should identify local areas for regeneration.	Policy 13 Renewal Areas The Council will seek opportunities for enhance and improvement within Renewal Areas (such as Crystal Palace, Penge and Anerley). Aim is to expand access to leisure facilities and improving accessibility. Policy 14 Development Affecting Renewal Areas Development to demonstrate that they maximise their contribution to economic, social and environmental improvements. Policy 15 Crystal Palace, Penge and Anerley Renewal Area Proposals are expected to contribute to the conservation and enhancement of Crystal Palace Park.	NPPF Para 99 and 129d, GLA Character and Context SPG (2014)
	Metropolitan Open Land	Policy G3 Metropolitan Open Land Has the same level of protection as the Green Belt and should be protected from inappropriate development. Boroughs should work with partners to enhance the quality and range of uses.	Policy 50 Metropolitan Open Land Has the same level of protection as the Green Belt and should be protected from inappropriate development.	NPPF paras. 142-160
Green Infrastructure	Green Infrastructure	G1 Green infrastructure Should be protected and enhanced. Proposals should incorporate appropriate elements of green infrastructure.	-	NPPF Chapter 15 GLA Urban Greening Factor LPG (2023)
		G5 Urban greening Seeks a target score of 0.3 for non-residential developments		
	Open Space	G4 Open space Development should not result in the loss of open	Policy 55 Urban Open Space The Council will weigh any benefits being offered	NPPF Paras 103-108

		space and, where possible, create publicly accessible open space.	to the community if a development proposes a loss of open space.	
	Public Realm	D8 Public realm Ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain.	Policy 21 Opportunities for Community Facilities Encouraging cultural and leisure use of public realm.	
	Biodiversity	G6 Biodiversity and access to nature Development proposals should manage impacts on biodiversity and aim to secure net gain.	Policy 79 Biodiversity and Access to Nature The Council will enhance biodiversity across the Borough by securing the appropriate management if sites of metropolitan, borough and local importance.	NPPF Chapter 15 LBB Biodiversity Action Plan (2021-2026)
	Trees	G7 Trees and woodland Development proposals should ensure that, wherever possible, existing trees of value are retained. The planting of additional trees should generally be included in new developments.	Policy 43 Trees in Conservation Areas Development will not be permitted if it will damage any significant or important trees in a Conservation Area. Policy 73 Development and Trees Development will need to take particular account of existing trees on site and adjoining.	NPPF Para 136
Sports and Recreation	Health and well-being	GG3 Creating a healthy city Promote active and healthy lifestyles, improving access to recreation and sports and ensure buildings are well insulated and ventilated.	Policy 26 Health and Wellbeing Applications must maximise opportunities to support and enhance health and wellbeing by ensuring appropriate access to open space	NPPF Paras 98 and 103-107 GLA Social Infrastructure SPG (2015) GLA Play & Informal Recreation SPG (2012)
	Social Infrastructure	Policy S1 Developing London's social infrastructure Support for making the best use of land, including the public-sector estate. This includes the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities.	Policy 20 Community Facilities Permission will not be granted for proposals that would lead to the loss of community facilities, unless alternative enhanced provision is to be made in an equally accessible location for the community it serves.	NPPF Paras 103-108
		S4 Play and informal recreation Increase opportunities for play and informal recreation, incorporate accessible routes for children and young people and incorporate incidental play.	-	
	Sports Facilities	S5 Sports and Recreation Facilities Supports the enhancement of existing sports facilities, the provision of facilities in accessible locations maximising multi-use. Consider proposals for facilities on open space in light of open space policies.	Policy 58 Outdoor Sport Recreation and Play Supports the enhancement of sports facilities provided that the proposals address Green Belt and Open Space Policies, any loss is re-provided to an equivalent or higher standard or for alternative sport provision. Proposal should ensure car parking does not have an adverse effect on nature conservation.	NPPF Paras 96c and 98a

Design	Good Design	D4 Delivering good design Design and access statements should be submitted and design reviews encouraged.	Policy 37 General Design of Development Space about buildings should provide hard and soft landscaping. Applications should be accompanied by a written statement setting out design principles.	NPPF Chapter 12 GLA Accessible London SPG (2014) GLA Character and Context SPG (2014) GLA Planning for Equality and Diversity in London SPG (2007) LBB General Design Principles SPG (2004)
	Inclusive Design	D5 Inclusive design Development should facilitate social interaction and inclusion, be convenient and welcoming, be used safely and incorporate dignified emergency evacuation.	Policy 21 Opportunities for Community Facilities Proposals (and facilities) should ensure that they are easily accessible to all sections of the community.	
	Resilient and Safe Design	D11 Safety, security and resilience to emergency Maximise resilience and minimise potential physical risks. Include measures to design out crime.	Policy 37 General Design of Development Security and crime prevention measures should be included in the design and layout of buildings.	
	Fire Safety	D12 Fire safety The highest standards of fire safety must be achieved. Fire statements must be submitted for major development.	-	
	Important Views	HC3 Strategic and important views Manage views in accordance with the LVMF SPG. Boroughs should use the principles of Policy HC4.	Policy 37 General Design of Development Ensure developments positively contribute to the existing street scene and respect important views	
Access	Inclusivity	GG1 Building strong and inclusive communities Access to good quality places and inclusivity.	Policy 13 Renewal Areas Refers to how Renewal Areas will need to create inclusive communities. Policy 21 Opportunities for Community Facilities Proposals (and facilities) should ensure that they are easily accessible to all sections of the community.	NPPF Paras 96 and 135f GLA Accessible London SPG (2014) GLA Play & Informal Recreation SPG (2012) GLA Planning for Equality and Diversity in London SPG (2007)
Heritage	Designated Assets	Policy HC1 Heritage and conservation growth Development should conserve significance, actively manage cumulative impact, avoid harm and integrate heritage into the design process. For heritage at risk, Boroughs should identify opportunities for contributions to regeneration and place-making	Policy 38 Statutory Listed Buildings Reflects NPPG tests.	NPPF paras 207 to 221
			Policy 45 Historic Parks and Gardens Protect special features, historic interest and the setting of the park and garden.	
			Policy 41 Conservation Areas Preserve and enhance its characteristics and appearance by: respecting or complementing the layout, scale, form and materials of existing buildings and spaces; respecting and incorporating in the design existing landscape or other features that contribute to the character, appearance or historic value of the area, and;	

			using high quality materials.	
	Non-designated Assets	Policy HC1 Heritage and conservation growth Development should conserve significance, actively manage cumulative impact, avoid harm and integrate heritage into the design process. Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation.	Policy 39 Locally Listed Buildings Proposals to replace buildings will be assessed against para 135 of the NPPF (now para 216) Policy 40 Other Non-Designated Heritage Assets Non-Designated Heritage Assets that are at risk of harm will require demonstrable reasons or evidence of their significance.	
Energy and Sustainability	Energy efficiency	GG6 Increasing efficiency and resilience Improve energy efficiency and ensure buildings are adaptable to climate change.	Policy 124 CO2 Reduction, Decentralised Energy networks and Renewable Energy Major Developments must reduce CO2 emissions according to the London Plan	NPPF Paras 162-169 GLA Circular Economy Statements LPG (2022) GLA Energy Assessment Guidance (2022) GLA Energy Planning Guidance (2020) GLA Whole Life-cycle Carbon Assessments LPG (2022) GLA 'Be Seen' Energy Monitoring Guidance (2021)
	Emissions	SI2 Minimising greenhouse gas emissions		
Environment Conditions	Noise	D14 Noise Avoid significant adverse noise impacts and mitigate and minimise existing and potential adverse impacts.	Policy 119 Noise Pollution Proposed Developments that are likely to generate noise and vibration will require a full assessment to identify issues and mitigation measure.	NPPF Para 187e
	Air Quality	SI1 Improving air quality Development should be air quality neutral or acceptable. Must demonstrate how impacts during construction and demolition have been reduced.	Policy 120 Air Quality Developments that are located within AQMAs must provide a AQ Assessment. Developments should meet air quality neutral benchmarks in the GLA's Air Quality Neutral Report.	GLA Control of Dust and Emissions in Construction SPG (2014) GLA Air Quality Neutral LPG (2023) GLA Air Quality Positive LPG (2023)
Transport / Highways	Highway Impacts	Policy T4 Assessing and Mitigating Transport Impacts Transport Assessments must be submitted to ensure that a proposed development does not result in undue impacts on capacity, safety. The Healthy Streets approach should also be included within a Transport Assessment.	Policy 31 Relieving Congestion Development which is likely to be a significant generator of travel will need to provide a Transport Assessment, include details on Travel Plans, CLPs and Delivery and Servicing Plans.	NPPF Chapter 9
	Cycle Parking	Policy T5 Cycling Development proposals should remove barriers to cycling and create a healthy environment. Minimum Cycle Standards are set out in Table 10.2.	Policy 30 Parking For all non-residential uses and cycle parking, the policy refers to the London Plan standards.	GLA Sustainable Transport, Walking and Cycling LPG (2022)

	Car Parking	Policy T6.4 Hotel and leisure uses parking Sets maximum parking standards. Policy T6.5 Non-residential disabled persons parking Provided in accordance with the levels in Table 10.6		
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6. Planning Assessment

Principle of Development

6.1. The principle of revitalising CPNSC as an open, welcoming and sustainable sporting campus through interventions that rationalise and declutter the Site around the three themes of heritage, sport and sustainability, whilst providing modern and inclusive formal and informal sporting facilities, is fully supported at all levels of planning policy and guidance. Specifically:

The National Planning Policy Framework:

- Promoting social interaction and enabling and supporting healthy lives (para. 96).
- Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities; and can support efforts to address climate change (103).
- Prioritising sustainable transport modes and achieving safe and suitable access for all users (115).
- Design that functions well; is visually attractive; sympathetic to local character and history; maintains a strong sense of place and creates places that are safe, inclusive and accessible (135).
- Reduce greenhouse gas emissions; minimise vulnerability and improve resilience; encourage the reuse of existing resources and support renewable and low carbon energy (161).
- Great weight should be given to the conservation of heritage assets (212).

The London Plan:

- Promote more active and healthy lives for all Londoners to enable healthy choices and provide spaces for play, recreation and sport (Policy GG3 'Creating a healthy city').
- Public realm that is well-designed, safe, accessible, inclusive, attractive, well-connected and related to local and historical context, and is engaging for all ages with opportunities for social activities and formal and informal play (D8 'Public realm').
- Secure sites for a range of sports and recreation facilities, increasing or enhance provision and maximise the multiple use of facilities (S5 'Sports and recreation facilities').
- Conserve heritage asset's significance and settings by being sympathetic to their significance and appreciation within their surroundings (HC1 'Heritage conservation and growth').
- Reducing greenhouse gas emissions (SI 2 'Minimising greenhouse gas emission').

6.2. The Bromley Local Plan

- Maximising the opportunities for enhancement and improvement in Renewal Areas including enhancing existing development and assets, supporting health and wellbeing through access to recreation facilities. Conserving and enhancing CPP (Policies 13 'Renewal Areas' and 15 'Crystal Palace, Penge and Anerley Renewal Area').
- Promote quality of life and the health and wellbeing of those living and working in the Borough through the provision, enhancement and retention of facilities for recreation, sports and play (Policy 20 'Community Facilities').
- Supporting the provision and enhancement of sports and recreational facilities and encouraging leisure use of the public realm (Policies 21 'Opportunities for Community Facilities' 58 'Outdoor Sport Recreation and Play').
- Proactively improving the physical and mental health of the Borough's residents and reduce health inequalities by delivering quality, healthy environments, infrastructure and accessible health facilities (Policy 26 'Health and Wellbeing').
- Maintain, enhance and support the unique existing strategic cultural, sports, tourism and leisure functions of CPP (Policy 111 'Crystal Palace Strategic Outer London Development Centre').

- 6.3. Furthermore, the LPA and key consultees have been fully supportive of the principle of this development throughout the pre-application planning process.
- 6.4. Accordingly, the principle of the proposed development is fully in accordance with the Development Plan and supportive of a range of material planning considerations.

Town Centre and Retail Impact Assessment

- 6.5. The CPNSC is a longstanding and well-established sporting facility. Whilst indoor sporting facilities are provided as part of its overall sporting provision (including a fitness suite and facilities within the Indoor Sports Zone), the CPNSC is firmly established as a Class F2 'Local Community Uses' in planning terms. BLP Policies 15 'Crystal Palace, Penge and Anerley Renewal Area' and 111 'Crystal Palace Strategic Outer London Development Centre' are clear that these sporting facilities are part of the unique strategic character of CPP and should be maintained and enhanced. Accordingly, the proposed development has no conflict with any town centre related policies.

Social Infrastructure Statement

- 6.6. The LBB Planning Validation Requirements requests a 'Social Infrastructure Statement' for proposals providing social infrastructure, which includes sports facilities. As set out above in this Statement, the principle of providing enhanced and additional sporting facilities at CPNSC is supported at all levels of planning policy and guidance, including the BLP.
- 6.7. The specific typologies of sporting facilities to be provided has been informed by extensive engagement with the local community and stakeholders (as set out in the SCI) and a range of sporting bodies (as detailed in the DAS) as sought by LP S1 'Developing London's social infrastructure'. A number of existing sporting facilities across the CPNSC will be improved and new facilities provided. Full details are provided in the DAS and summarised at Section 4 Development Proposals of this Statement. Key interventions include:
 - Environmental separation of wet and dry sporting facilities in the Main Building, along with a new energy centre, improved building fabric and solar control, for the comfort of all users.
 - Consolidation of all swimming facilities into the Main Building and reinstatement of the main pool and diving.
 - Additional exercise studios, large fitness suite and combined gymnastics and dry diving in the Main Building.
 - New wet and dry changing facilities.
 - Refurbished indoor running track and replacement climbing facilities in the Indoor Sports Zone.
 - Outdoor pitches and courts to include replacement artificial multi-use pitch and two new artificial football pitches, two junior grass football pitches, four tennis courts, six padel courts, two 3x3 basketball courts and four beach volleyball courts.
 - Refurbishment of the Stadium, including a net additional 515 seats as part of the completion of the stadium bowl and other interventions.
 - A new public outdoor Sports Plaza area including a 200m running track, additional 3x3 basketball court and outdoor gym.
- 6.8. The improvements to The Stadium (in particular) will support the objective of bringing world class sporting and other events back to the CPNSC for the benefit of the community.
- 6.9. In addition to the sporting facilities themselves, the Main Building will include healthwise consultation rooms, an expanded soft play and party room.
- 6.10. Access and inclusivity will be improved through both this application (for example through the completion of the stadium bowl which will provide ramped access between upper and lower levels of the Site) and in tandem with the Park Masterplan.
- 6.11. In summary, the proposals will enhance sporting social infrastructure and directly contribute to active lifestyles, health and wellbeing, fully in accordance with LP Policy S1, BLP Policy 20 'Community Facilities' and objectives within the NPPF (Chapter 8).

Metropolitan Open Land

- 6.12. The Application Site is within land designed as Metropolitan Open Land (MOL), as is Crystal Palace Park as a whole. LP Policy M3 'MOL' and BLP Policy 50 'MOL' afford MOL the same status and protection as green belt land. BLL Policy 57 'Outdoor Recreation and Leisure' (parts a and d) requires development on MOL to constitute 'appropriate development' as defined by the NPPF and to be accessible by a choice of means of public transport.
- 6.13. The accessibility of the development is addressed in the Transport Assessment and summarised under the 'Access and Movement' sub-section of this Statement.
- 6.14. The NPPF (Chapter 13) sets out the national policy tests for development in the green belt and defines what is 'inappropriate' development within it (para. 154). Defined exceptions to inappropriate development include (para. 154(b and c)):
- *"the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation...; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it; and*
 - *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."*
- 6.15. The CPNSC proposals comprise development that clearly falls within one or both of the above categories. The majority of the works relate to the refurbishment or enhancement of outdoor sports and recreation facilities. The alterations to the Main Building (relating to indoor sports) will not result in disproportionate additions. In contrast, the relocation of the 25m pool into the Main Building and associated demolition of the 25m pool building will result in a net loss of building footprint and volume. Accordingly, the proposals are: not 'inappropriate development' in the 'green belt' as per the test that is applied to MOL; will not result in harm to the MOL, and; meet the in-principle MOL policy tests in the Development Plan.
- 6.16. The proposal includes the demolition of the 25m swimming pool and The Lodge, which in combination will remove 4,753sqm of floorspace from the MOL and, alongside general decluttering of the Site and accessibility improvements, will serve to 'open up' the Site and enhance the role of the Site as strategic open land within the urban area (LP para. 8.3.1).
- 6.17. The proposed development does not introduce any inappropriate development into the MOL and therefore satisfies LP Policy G3(A1) and BLP Policies 50 and 57 which seek to protect the MOL from such development. Further, it will directly contribute to the LP Policy G3(A2) objective of enhancing the quality of the existing sporting use in the Crystal Palace Park MOL. This will be achieved by enhancing the sporting and leisure uses and the heritage value of the MOL, and access to them, and encouraging walking, running and other physical activity as supported by the LP (paras. 8.3.1 and 8.3.4).

Design and Placemaking

- 6.18. The design rationale, evolution and resultant proposals are comprehensively detailed in the submitted DAS so not repeated in detail here. An Access and Inclusive Design Statement has also been provided. In summary, the design approach has been sympathetic to the unique parkland setting of the CPNSC and heritage assets, whilst ensuring enhanced and new sporting facilities are accessible, inclusive and fit for purpose. The resultant sensitive and high quality design will deliver significant design and related benefits, specifically:

Heritage:

- Safeguards and enhances the significance of the Grade II* listed Main Building.
- Repair-led and sensitive interventions reinforce the clarity of the original mid-century modern composition and Paxton's historic landscape structure.
- Retention and adaptation of the Main Building and Stadium secure their role as prominent heritage assets within Crystal Palace Park

Accessibility:

- Addresses long-standing barriers to movement through new step-free routes, improved entrances and clearer site-wide circulation.

- Upgrades spectator and participant facilities in line with current inclusive design standards.
- Improves safety, comfort and legibility for all users, supporting a more welcoming and inclusive environment.

Sport:

- Re-establishes the Stadium as a leading national / international centre for athletics, supporting grassroots participation, club use and competitive events.
- Enhances indoor and outdoor sports facilities to support a broad range of activities and user groups.
- Creates stronger functional relationships between facilities, improving flexibility, shared use and operational efficiency across the sub-masterplan.

Sustainability:

- Adopts a sustainable retrofit approach, improving building fabric, services and energy performance while minimising impact on historic fabric.
- Enhances landscape quality and ecological value within the park setting.
- Supports a resilient and efficient long-term operational model through rationalised layouts and durable materials.

6.19. The resulting development will be high quality, legible and distinctive, celebrating the unique parkland setting and 1960's architecture of the CPNSC. It will provide a modern, sustainable and inclusive development fully in accordance with the design and access objectives of LP Policies D4 'Delivering good design', D5 'Inclusive design', D11 'Safety, security and resilience to emergency', BLP Policies 21 'Opportunities for Community Facilities' and 37 'General Design of Development, the NPPF (Chapter 12) and local guidance.

Heritage

6.20. The Application Site includes three designated heritage assets: the CPNSC Main Building, a Grade II* listed building; Crystal Palace Park, a Grade II* Registered Park and Garden (CPRPG), and; Crystal Palace Park Conservation Area (CPPCA). The Main Building sits wholly within the Site, the CPRPG and CPPCA designations cover the wider Park. Two non-designated heritage assets are identified within the Site; the Stadium and The Lodge. There are a number of further designated and non-designated heritage assets within Crystal Park beyond the Application Site boundary. On Site and nearby heritage assets are identified and fully assessed in the Heritage Assessment (HA).

6.21. This Section of the Planning Statement does not seek to replicate the HA but identifies the relevant heritage legislative and policy tests and key conclusions on heritage harm and benefits. The proposed development includes the demolition of The Lodge, a non-designated heritage asset, this requires clear justification and this is also provided in the following sub-section of this Statement.

Legislative and Policy Tests

6.22. In considering whether to grant planning permission, the Planning (Listed Buildings and Conservation Areas) Act 1990 (PLBCA) requires decision-makers to have special regard to the desirability of preserving listed buildings and their settings (Section 66); and to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area (Section 72).

6.23. The NPPF (paras. 207-221) sets out the tests for assessing the heritage asset that may be impacted by the proposed development. The principles of these tests are reflected in LP Policy HC1 'Heritage conservation and growth' and BLP Policies 38 'Statutory Listed Buildings', 39 'Locally Listed Buildings', 41 'Conservation Areas' and 45 'Historic Parks and Gardens'.

6.24. Any harm to the significance of a *designated heritage* asset should require clear and convincing justification (NPPF para. 213). NPPF para. 215 states:

"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.."

6.25. In relation to *non-designated heritage assets*, NPPF para. 216 states:

“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

Summary of Heritage Impact

- 6.26. A proportionate description of the significance of heritage assets, as required by the NPPF (para. 207), has been carried out at Section 4 of the HA.
- 6.27. The Assessment comprehensively details the heritage harm and heritage benefits of the proposed development on heritage assets and these are summarised at Tables 6.2 and 6.1 of the HA respectively.
- 6.28. The harm to the CPNSC Main Building comprises the direct impacts of selective demolition and alteration of fabric and features and or changes within its setting indirectly. This is judged to be at the lower end of the scale of less than substantial harm in NPPF terms. The proposed removal of The Lodge associated with the postwar phase of CPP would also result in less than substantial harm to the CPPRPG and CPPCA, but at the very lowest end of the scale. These harms need to be weighed against the public benefits of the proposal.
- 6.29. The removal of The Lodge will result in the loss of this non-designated heritage asset and effect the group value it shares with other locally listed buildings as part of postwar CPNSC complex. This requires a balanced judgement in accordance with the NPPF. However, the *planning justification* for the removal of The Lodge is provided in the following section of this Statement.
- 6.30. These judgements are made as part of the planning balance at Section 7 Conclusions of this Statement. Notwithstanding, part of this balance are the heritage benefits that the proposed development will deliver. As identified in the HA, the proposal is of high quality architectural and landscape design that has been closely informed by a detailed understanding and appreciation of the heritage interests and values of CPP and the CPNSC. It takes the opportunity to optimise the use of the Main Building and The Stadium, and their sporting role within the historic park, by retaining and enhancing their original function as a multi-sports complex and securing and optimising their viability and sustainability for the future.
- 6.31. In respect of the proposed removal of the 25m pool building, a 25m teaching pool is to be provided in the Main Building alongside a flexible 50m pool, so there is no loss of this facility. The existing 25m pool building does not form part of the listed Main Building’s special interest and this element of the proposal has been discussed with the LPA and HE at pre-application stage and no objection raised. Overall, on this element, the HA considers that its removal and resultant reinstating of the positive aspect of the listed building’s setting, and also the visual experience within the wider parkland. The removal of the 25m pool building will enhance and better reveal the heritage significance of the Main Building and other heritage assets.
- 6.32. The heritage benefits of the proposal are numerous as summarised in HA (Table 6.1):
- Crystal Palace National Recreation (Sports) Centre (Grade II* Listed Building):
- Optimising the viable and sustainable use of the NSC for multi-sports to secure its future conservation (overarching objective)
 - Required works of repair, refurbishment and or upgrade at high quality and sympathetic approach, both externally and internally
 - Demolition of small / 25m pool to better reveal the original pavilion in the park character and views of the NSC. Including activation and improvement in the design of immediate setting through the new Sports Plaza
 - Reinstatement of timber style seating to upper stand where previously removed
 - Improving the accessibility and inclusion of the NSC (overarching objective - various measures)
 - Removal / rationalisation of later cluttering elements from main entrance and concourse areas to improve internal views
 - Removal of later partitions surrounding the Crystal Suite to reinstate its mezzanine-like expression in main volume
 - Upgrade of external glazed envelope with more consistent and high quality design, and improvement of views between NSC and park. Including replacement of later obscured panels to the pool hall elevations

- Improving the environmental performance and energy efficiency of the NSC as an exemplar for a Grade II* listed building (overarching objective - various measures)
- Reuse and refurbishment of the community hub building at high quality. Including improved accessibility and inclusion
- Removal of the later and redundant scoreboard to the stadium to open up shared local views of the NSC
- Removal and or upgrade of later infill walling below elevated walkway and piers to NSC at high quality
- Wider public realm improvements / landscape proposals within the wider setting of the NSC. Including improving user accessibility, inclusion, and wayfinding and legibility in relation to the NSC and its connections to the park, decluttering of later features, high quality hard and soft landscaping in sympathy with topography and open / green character of park.

6.33. Crystal Palace Park Registered Park and Garden (Grade II*):

- Optimising the viable and sustainable use of the NSC for multi-sports to secure its future conservation within the park (overarching objective).
- Required works of repair, refurbishment and or upgrade of NSC at high quality and sympathetic approach, both externally and internally.
- Demolition of small / 25m pool to better reveal the original pavilion in the park character and views of the NSC. Including activation and improvement in the design of immediate setting through the new Sports Plaza.
- Upgrade of external glazed envelope with more consistent and high quality design, and improvement of views between NSC and park.
- Reuse and refurbishment of the community hub building at high quality. Including improved accessibility and inclusion.
- Removal of the later and redundant scoreboard to the stadium to open up shared local views of the NSC.
- Removal and or upgrade of later infill walling below elevated walkway and piers to NSC at high quality.
- Wider public realm improvements / landscape proposals within the park. Including improving user accessibility, inclusion, and wayfinding and legibility in relation to the NSC and its connections to the wider park, decluttering of later features, high quality hard and soft landscaping in sympathy with topography and open / green character of park.
- Removal of physical and visual intrusion of the redundant and poor condition Lodge tower, including return to open / green public parkland and opening up of local and long distance views across the park as part of 19th century character.
- Reduction / rationalisation of car parking hardstanding along the pedestrianised Paxton Axis (Upper Terrace Arrival).
- Opening connection and views to sports hub from lower park below east end of elevated walkway (Penge West Arrival).

Crystal Palace Park Conservation Area:

- Optimising the viable and sustainable use of the NSC for multi-sports to secure its future conservation within the park (overarching objective)
- Required works of repair, refurbishment and or upgrade of NSC at high quality and sympathetic approach, both externally and internally
- Demolition of small / 25m pool to better reveal the original pavilion in the park character and views of the NSC. Including activation and improvement in the design of immediate setting through the new Sports Plaza
- Upgrade of external glazed envelope with more consistent and high quality design, and improvement of views between NSC and park
- Reuse and refurbishment of the community hub building at high quality. Including improved accessibility and inclusion
- Removal of the later and redundant scoreboard to the stadium to open up shared local views of the NSC

- Removal and or upgrade of later infill walling below elevated walkway and piers to NSC at high quality
- Wider public realm improvements / landscape proposals within the park. Including improving user accessibility, inclusion, and wayfinding and legibility in relation to the NSC and its connections to the wider park, decluttering of later features, high quality hard and soft landscaping in sympathy with topography and open / green character of park
- Removal of physical and visual intrusion of the redundant and poor condition Lodge tower, including return to open / green public parkland and opening up of local and long distance views across the park as part of 19th century character
- Reduction / rationalisation of car parking hardstanding along the pedestrianised Paxton Axis (Upper Terrace Arrival)
- Opening connection and views to sports hub from lower park below east end of elevated walkway (Penge West Arrival).

Athletics Stadium (West Stand and Jubilee) Locally Listed Building (non-designated):

- Optimising the viable and sustainable use of the Stadium in its original sports use to secure its future conservation as part of the NSC and within the park.
- Wider public realm improvements / landscape proposals within the wider setting of the NSC and stadium at its core. Including improving user accessibility, inclusion, and wayfinding and legibility in relation to the wider NSC complex and its connections to the park.
- Reinforcing the enclosure of the stadium bowl at its north end with the curved form of the new ramp structure (Stadium Loop) and erection of a new smaller stand block, which would improve the overall experience and atmosphere for both competitors and spectators when in use.
- Removing the late 1970s scoreboard structure to open up new (or otherwise reinstating) views out from the track side and stand seating to better appreciate the core NSC building immediately to the north, contemporary with the original layout of the stadium.

Heritage Summary

6.34. In summary, heritage is one of the three key themes of the proposals with a clear objective to protect and celebrate the heritage value of the CPNSC Main Building and the landscape.

6.35. The proposed development will result in some 'less than substantial harm' to designated heritage assets and the removal of a non-designated heritage asset - The Lodge, which is considered in the following sub-section of this Statement. This 'heritage harms' need to be weighed against the public benefits of the scheme and considered as part of a balanced judgement in accordance with the relevant NPPF tests respectively. As part of this, the numerous and significant heritage benefits of the scheme identified above are an important consideration. This is done at Section 7 Conclusions of this Statement

6.36. Overall, the proposed development has been designed to conserve heritage assets and their significance, as well as preserve or enhance the settings of designated heritage assets in accordance with the PLBCA and relevant planning policy tests.

Proposed Demolition of The Lodge

The Buildings and Context

6.37. The Lodge comprise the 13-storey tower that formerly provided athlete accommodation, together with associated low-rise buildings containing dining, catering and living spaces.

6.38. On-site accommodation forms part of the CPNSC estate, comprising (i) the 'The Lodge' complex to the north of the Main Building to provide accommodation for athletes which is located on the Application Site, and (ii) six semi-detached houses to the immediate south of The Lodge and outside of the Site, intended for coaches and staff associated with CPNSC.

6.39. The Lodge consists of two principal elements:

- A 13-story tower providing 87 bedrooms, designed in a hexagonal plan form and prominently located on elevated ground.
 - A group of single- and two-storey ancillary buildings at its base, accommodating shared dining, catering and social spaces, arranged in a series of interconnected triangular and hexagonal blocks.
- 6.40. The six semi-detached houses have consistently been occupied by residents associated with the operation of CPNSC and under assured shorthold tenancies. The houses remain in use as residential accommodation serving the site and are the subject of their own local listing. No change is proposed to the houses which will remain and do not form part of the planning application.
- 6.41. Use of both the houses and The Lodge have always remained ancillary to the main use of the site as a sports centre (Use Class F2).
- 6.42. The Lodge were locally listed by the London Borough of Bromley between 1975 and 1982 (as identified in the local listing report). Their local listing was intended to recognise their local heritage interest and group value as part of the larger post-war sports complex.
- 6.43. As set out in at Section 2 of this Statement, Planning permission was granted in 2010 for demolition of these structures as part of the broader masterplan vision for the regeneration of Crystal Palace Park.
- 6.44. The Lodge Tower has been vacant since 2019, following a fire safety assessment which identified serious risks associated with its external cedar cladding, and classified as a 'Higher-Risk Building' under the Building Safety Act 2022. Since closure, the building has suffered from vandalism and anti-social behaviour due to its secluded position on the edge of the CPNSC estate and lack of natural surveillance. The site operator has been required to maintain a 24-hour security presence at considerable ongoing public cost.

Proposals for The Lodge

- 6.45. As part of the wider planning application for the redevelopment and refurbishment of the CPNSC, the proposals include the demolition of The Lodge. Following demolition, the cleared site will be relandscaped and returned to parkland. The design approach prioritises the restoration of the park's natural topography, openness and greenery, while integrating the space into the wider leisure and recreational network of the park and sports facilities provided by the centre. Key elements of the landscape works include:
- Restoration of grassed areas and soft landscaping to reconnect with the surrounding parkland.
 - Retention and protection of existing mature trees.
 - Provision of a new grass sports pitch, forming part of the enhanced outdoor sports offer.
- 6.46. These proposals are set out in detail in the Design and Access Statement and directly support the overarching aims of the redevelopment of the sports centre and wider masterplan for the Park – to create a sustainable, inclusive and accessible sports campus embedded within a revitalised historic parkland setting.

Most Relevant Planning Policy and Guidance

- 6.47. The planning policy tests for the demolition of this non-designated heritage asset, and the resultant impact of designated heritage assets, are identified above in the Heritage sub-section of this Statement. Further to this, NPPF para. 219 sets out that LPAs should look for opportunities for new development within conservation areas, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.
- 6.48. In addition, the NPPG advises that LPAs should take a pragmatic and proportionate approach to assessing the continued relevance and significance of locally listed buildings, particularly where circumstances, use or community value have changed over time, or where retention would conflict with wider heritage objectives.
- 6.49. LP and BLP policies collectively echo the NPPF's proportionate and balanced approach to be taken to the conservation of both designated and non-designated heritage assets, in terms of their particular significance (and any contribution of setting), and also in positively managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance. Again, it is the conservation of designated heritage assets that is to be given great weight.

6.50. The LBB Supplementary Planning Guidance for Crystal Palace Park (the 'SPG') provides a detailed preservation and enhancement framework for the Park. This sets the main objective for the Park as the 'preservation and enhancement of its mid 19th century landscape character, together with those built and landscape features remaining from Paxton's design'. The SPG also highlights the ridge west of the CPNSC Main Building, where the Lodge Tower is located, as a strategically important skyline feature, affording long views across Bromley and North Kent.

6.51. In summary, the planning policy framework at all levels recognises that:

- The Lodge are non-designated heritage asset and the degree of protection should be proportionate to its local heritage significance, and the impacts of the proposals.
- Benefits should carry significant weight in the overall planning balance in considering the harm to local heritage significance arising from demolition.
- In consideration of the heritage benefits set out above, greater weight should be given to sustaining, and also where appropriate enhancing, the significance of 'designated' heritage assets.
- The views of stakeholders and the public on the value of retention vs removal are also of importance, as set out in NPPG.
- Consideration should be given to potential alternative uses consistent with the conservation of heritage assets, whilst also taking account of any technical constraints to enable such reuse.

Heritage Significance of The Lodge

6.52. The heritage significance of The Lodge, in terms of their significance and contribution to other heritage assets is fully detailed in Chapter 4 of the Heritage Assessment. In summary, whilst the building's exhibit the function and geometric experimentation typical of mid-1960s design, they lack the architectural finesse and distinction, material quality and structural innovation of the more purely modernist Grade II* Main Building. Their local heritage significance instead derives to a greater degree from their past association with the contemporary postwar development of the core buildings and structures of the CPNSC, including the Main Building, the locally listed Stadium and housing, in particular as accommodation to support these functions.

Potential for Adaptation and Re-Use

6.53. In line with planning policy and guidance, the Application has comprehensively explored the potential for adaption and re-use of The Lodge.

Condition and Structural Viability

6.54. Technical reviews commissioned by the GLA (as Applicant) have confirmed that The Lodge is at the end of its design life. Key issues identified are set out below.

- Under current Building Regulations Part B, buildings over 11m must use cladding with a minimum fire performance rating of A2-s1,d0. The Tower and lodge cedar cladding is typically rated D-s2,d0, falling well below this and is unsuitable for reuse.
- The existing timber cladding is lightweight and supported by the concrete slab edges. A new cladding system would need to be designed to BS EN 1991-1-4, for maximum frontal deflection of cladding to accommodate wind loading. The concrete slabs and structural arrangement of the existing tower would not be able to accommodate this loading, and would require heavy structural reinforcement to accommodate, which in turn would require full/ partial demolition of the concrete floor slabs to each level.
- The existing Lodge Tower only has one staircase, in direct contravention of the Building Regulations Part B. New UK guidance mandates a second staircase for new residential buildings over 18m tall, effective from 30 September 2026, to improve fire safety by providing two escape routes. The existing structural arrangement will not facilitate the incorporation of a second staircase without partial demolition and major structural interventions. A second staircase would also be impractical as it would take a significant amount of building footprint, restricting the ability to accommodate residential uses or other alternatives.

- Inside the building the differing heights of each hexagon make the tower inaccessible for disabled users when they exit the lift core. There is also no disabled refuge point for any person with vulnerable needs such as partial sight or a wheelchair to vacate the building safely in the event of an emergency.
- The building does not have a smoke extract system in place and therefore does not conform to BS 7346-8.

6.55. A comprehensive Refurbishment and Demolition survey has identified significant amounts of high-risk asbestos, described as having a “high potential to release fibres if disturbed.” The asbestos is extensive and is located in critical areas necessary for any future adaptation, including the roof, risers, and walls. These locations make safe removal highly complex and require fully controlled conditions.

6.56. Because the vast extent of asbestos that is embedded in areas that would inevitably be disturbed during any refurbishment or change of use, the building cannot be feasibly repurposed in its current state. A full removal and decontamination program would be required. Additionally, the thermal properties originally provided by the asbestos would need to be reinstated; however, achieving current standards may be challenging due to limitations in material depth.

6.57. Given the Tower’s height it would generally require fully compliant protected lobbies and a suitable smoke control strategy either natural ventilation or a mechanical smoke extract system to keep stairwells, lobbies, and corridors free from smoke during evacuation. However, the current layout with single internal stair and lift core makes it unlikely that the necessary smoke control measures could be incorporated without major structural alteration. As a result, achieving compliance with modern Building Regulations may not be feasible within the existing building configuration.

6.58. In summary, the buildings do not conform to various Building Regulation requirements and other statutory regulations, including BS9991, BSEN1991-1-4, BS7346-8, BS5839, CIBSE TM23, CIBSE TM59. Remedial works to address these issues would require near-total replacement of the external and internal fabric and services, effectively amounting to reconstruction rather than refurbishment.

Consideration of Alternative Uses

6.59. As noted above, adaptation to accommodate uses within the buildings would require reconstruction and would be disproportionate to any heritage interest that could be retained. In any case, the GLA (as Applicant) has looked at alternative uses, none of which would be viable. In summary:

- Hotel Accommodation - market engagement indicated some demand for hotel accommodation in the area. However, operators require a minimum capacity of circa 150 beds to be commercially viable. The Lodge Tower only provides only 87 rooms, only one of which is accessible, and its irregular plan makes reconfiguration impractical.

Moreover, should it be converted into a hotel, it would operate distinctly from the wider CPNSC estate. Continuous access would be required, and additional trips would be generated by both customers and for servicing and operations. Any such proposals would also be contrary LP Policy E10 ‘Visitor infrastructure’ which directs visitor accommodation to the Central Activities Zone, town centres and Opportunity Areas, none of which are applicable to the Site.

- Residential - as identified above, residential use would necessitate complete internal reconstruction, new floorplates and servicing cores impacting any architectural interest. Any such use would be independent of the CPNSC, and therefore conflict with the Site’s established F2 Use Class.

Residential use would substantially increase the residential population within the heart of Crystal Palace Park, contrasting with its primary purpose as a centre of recreation, leisure and sport.

- Ancillary Uses to the CPNSC - alternative uses such as a café, conference or community space have been considered. However, equivalent and better-located facilities are already incorporated within the redeveloped CPNSC. Retaining The Lodge for these uses would duplicate provision and undermine long-term operational viability.
- Sporting Use - the irregular floor plates and structural investigations have concluded that the masonry construction is unsuitable for any sporting use or other load-bearing sporting structure.

6.60. In all cases, adaptation would involve significant intervention and alteration, eroding what relatively limited local heritage interest the building has, while failing to produce a viable outcome. No reasonable or policy-compliant reuse has therefore been identified.

Stakeholder Views

6.61. Extensive engagement has been undertaken as part of the wider consultation on the Crystal Palace National Sports Centre redevelopment, as set out in the SCI. Feedback shows strong local and stakeholder support for the demolition of The Lodge. 88% of respondents agreed that the buildings should be removed and this area of the Site returned to parkland and an additional outdoor pitch. This should be accorded weight in consideration of the overall heritage value as set out in NPPG.

Heritage, Planning and Public Benefits

6.62. The necessary planning balance and heritage assessment against heritage tests are undertaken comprehensively for the scheme in the Conclusions to this Statement. However, the removal of The Lodge from the Site will result in a number of direct and indirect planning and public benefits, comprising:

- Restore an aspect of the Park's original landscape character, reinstating the open and green parkland setting, and also public use and amenity, that formed part of Paxton's 19th Century design and remains integral to its heritage significance as a registered park and garden and conservation area.
- Enhance key views and vistas from within, across and from outside the park, including the View of Local Importance identified in the BLP that looks eastwards from the Upper Terrace of the Italian Terraces to and beyond the CPNSC site (images from this view are provided in the Design and Access Statement), historic views (now partly or wholly obscured) identified in the Crystal Palace Park Conservation Area Appraisal and Management Plan 2007, and also the important skyline ridge identified in the Crystal Palace Park SPG.
- Reinforce positive aspects of the setting and longer distance and local views of the Grade II* listed CPNSC Main Building, by removing a redundant and deteriorating feature and reinstating parkland, which would to some degree better reveal its important visual and functional primacy as the 'pavilion in the park' at the heart of the CPNSC.
- Improve enjoyment, legibility and coherence of the Park's 19th Century heritage by removing a visually incongruous and urbanising modern structure that detracts from the quality and character of this landscape's visual and spatial unity.
- Reveal, protect and celebrate mature trees considered to be of significant value within the landscape proposals, benefiting the park's heritage, ecology and amenity.
- Create new active recreation space, including provision for a small sided grass pitch, increasing opportunities for youth and community sport.
- Support the long-term operational and financial sustainability of CPNSC by removing a high-cost, high-risk structure and enabling resources to be reinvested in active use areas.
- Contribute to the wider strategic objectives of enhancing inclusive participation in sport, improving health outcomes and maximising public benefit from the estate.

6.63. A number of these outcomes directly address the objectives of the LP and Policy HC1 'Heritage conservation and growth' in relation to ensuring heritage conservation and also delivering growth for the city, which requires development proposals to identify, conserve and enhance London's heritage assets and their settings in a manner appropriate to their significance.

6.64. The proposed reinstatement of parkland and creation of active recreational space represents an appropriate re-use of the site that responds well to the surroundings and context and enhancing green infrastructure and sports facilities. This directly responds to policy objectives including those of LP Policies S5 Sports and recreation facilities and G4 Open space, and BLP Policy 58 'Outdoor Sport, Recreation and Play', all of which encourage the protection and enhancement of sporting and recreational facilities.

6.65. Collectively, these improvements reinforce the case that the demolition of The Lodge will provide substantial public and planning benefits, further strengthening the overall planning balance in favour of demolition.

Conclusions on The Lodge

6.66. In summary, whilst The Lodge is locally listed (i.e. a non-designated heritage asset), this dates back several decades. The building is of no particular architectural merit and the heritage value prescribed principally arises

as forming part of a group of buildings comprising the CPNSC estate, and in particular the athlete's accommodation provided. This function is no longer required as part of the CPNSC's function and is not possible given the technical and regulatory constraints to re-use. The heritage value of the building is therefore no longer capable of being sustained or realised in practice.

- 6.67. The building's non-compliance with modern safety and accessibility standards render its retention impractical. In addition, remedial works to address these issues or to adapt to alternative uses would require near-total replacement of the external fabric and services; effectively amounting to reconstruction rather than refurbishment, which would be wholly disproportionate to any heritage interest that could be retained.
- 6.68. As found today, its continued lack of use, unsympathetic physical and visual presence also detracts from a number of positive aspects of the character and appearance of the surrounding 19th Century landscape of the CPPRPG and CPPCA, both of which represent higher-order heritage designations.
- 6.69. Recent public engagement demonstrates an overwhelming support for its demolition and return to parkland. Furthermore, there is planning precedent for the demolition of The Lodge as part of the previous masterplan proposals at the Site.
- 6.70. Demolition of The Lodge will deliver substantial planning (including heritage) benefits, which associated with the wider scheme proposals to optimise the use and secure the future

Access and Movement

- 6.71. NPPF para. 115 places clear emphasis on prioritising sustainable transport modes and achieving safe, inclusive and accessible environments for all users. These principles are reinforced through the LP and the BLP, both of which seek to promote walking, cycling and public transport use, while also recognising the need for appropriate and well-managed parking provision. Relevant parking standards are set out in Policy T6.4 of the LP 'Hotel and leisure uses parking' and Policy 30 'Parking' of the BLP.
- 6.72. A comprehensive Transport Assessment (TA) accompanies the application, supported by a suite of transport-related documents prepared in accordance with best practice guidance. These include a Framework Travel Plan, a Delivery and Servicing Plan, and an Outline Construction Logistics Plan. Collectively, these documents demonstrate that the proposals accord with applicable development management policies and provide a robust framework for managing travel demand.
- 6.73. The TA confirms that the site benefits from a Public Transport Accessibility Level (PTAL) ranging from 2 to 4, indicating a moderate level of accessibility by public transport, consistent with its Outer London location. This provides a suitable basis for supporting a shift towards more sustainable travel patterns.
- 6.74. In line with national, regional and local policy objectives, the proposals seek to minimise car dependency by rationalising and reducing car parking provision across the site, thereby encouraging a long-term modal shift towards sustainable and active modes of travel. Overall car parking provision will be reduced but with the level of accessible parking retained and electric vehicle parking increased. This is in line with relevant guidance and inclusive design standards. Cycle parking provision will meet or exceed adopted standards and will be located in secure, convenient and accessible locations throughout the site.
- 6.75. Trip generation associated with the development has been robustly assessed within the TA. Daily user numbers are forecast to increase from approximately 4,000 to 4,800 by year five of operation. Importantly, the assessment demonstrates that peak activity periods occur outside of traditional weekday highway peak hours, with weekday demand peaking between 18:00 and 19:00, and weekend activity peaking between 10:00 and 11:00. As such, the TA concludes that the uplift in activity can be accommodated by the existing highway network and public transport services without giving rise to material adverse impacts.
- 6.76. The TA further demonstrates a positive shift in mode share, with 78% of trips expected to be undertaken by walking, cycling or public transport. This exceeds the Mayor of London's strategic target for Outer London, which seeks for 75% of trips to be made by sustainable modes by 2041, as set out in the Mayor's Transport Strategy.
- 6.77. Overall, the proposals support a significant increase in activity at the sports centre while reinforcing a strong and policy-compliant shift towards sustainable travel. The development maintains safe and acceptable conditions for all transport modes and can be accommodated within the capacity of the existing transport network. With appropriate mitigation measures and a continued focus on sustainable travel, the proposals fully

align with national, regional and local planning policy and will enhance the accessibility and long-term resilience of this important London sporting and community facility.

Fire Safety

6.78. London Plan Policy D12 promotes the highest standards of fire safety in all developments. The policy requires development proposals to, inter alia, be designed to incorporate appropriate fire safety features that reduce the risk of fire, limit fire spread, and provide safe and suitable means of escape. London Plan Policy D5 further seeks to ensure that developments provide safe and dignified emergency evacuation for all building users. Where lifts are proposed, the policy requires that, as a minimum, at least one suitably sized fire evacuation lift is provided per core.

6.79. The application is supported by a suite of Fire Statements which demonstrate how the relevant requirements of the London Plan have been fully considered and appropriately addressed. Separate Fire Statements have been prepared for:

- The Main Building and replacement energy centre;
- The Stadium Jubilee Stand.
- Indoor Sports.

6.80. The Statements confirm that safe and dignified emergency evacuation is incorporated within each building for all users, including disabled occupants, and that the proposals have been designed in accordance with all relevant fire safety legislation, guidance, and regulatory requirements.

Climate Change, Sustainability and Energy

6.81. LP Policy SI 2 'Minimising greenhouse gas emissions' requires major development to be net zero-carbon in operation. This is to be achieved through the reduction of greenhouse gas emissions and the minimisation of both annual and peak energy demand, in accordance with the energy hierarchy of be lean, be clean, be green and be seen.

6.82. In accordance with this strategic policy, BLP Policies 123 'Sustainable Design and Construction' and 124 'Carbon Dioxide Reduction, Decentralised Energy Networks and Renewable Energy' similarly seek to secure high standards of energy efficiency and carbon reduction in new development, encouraging best practice in sustainable design and low-carbon energy generation.

6.83. The planning application is supported by an Energy and Sustainability Statement which sets out the scheme's response to the energy hierarchy and demonstrates how energy demand and carbon emissions have been minimised through a combination of passive design measures, efficient building services and low-carbon technologies.

6.84. At the 'lean' stage, the proposal seeks to reduce energy demand through a fabric-first approach, incorporating high levels of thermal insulation, high-performance glazing and passive design measures such as natural ventilation where appropriate. These measures are supplemented by active design strategies, including mechanical ventilation with heat recovery (MVHR) and high-efficiency lighting, to further limit operational energy consumption.

6.85. The 'clean' stage relates to the use of low-carbon heat sources, including connection to decentralised energy networks. There are currently no existing district heating networks with sufficient capacity in the vicinity of the site; however, the development has been designed to enable future connection should a network become available, in accordance with LP and BLP requirements.

6.86. The 'green' stage focuses on the incorporation of renewable and low-carbon energy technologies. The Energy Statement confirms that Air Source Heat Pumps (ASHPs) are proposed to provide heating and cooling to all spaces via communal distribution systems. In addition, photovoltaic (PV) panels are proposed to maximise on-site renewable energy generation and carbon savings.

6.87. The 'seen' stage requires that energy performance is monitored post-completion to ensure that the development operates as intended and aligns with the Mayor's net zero-carbon objectives. The development

will be provided with a comprehensive set of energy sub meters to track and record the developments energy use.

6.88. LP Policy SI 2(c) requires major development to achieve a minimum on-site carbon reduction of at least 35 per cent beyond Building Regulations (Part L, 2021). The development will deliver a 42% reduction in accordance with this policy.

6.89. Overall, as set out in the Energy and Sustainability Statement, the development will deliver a range of sustainability benefits that will contribute to the NPPF objective of achieving sustainable development including: addressing operational carbon through a strategy of fabric improvement, MEP strategy enhancements and electrification of building services; addressing embodied carbon through a strategy of reuse and refurbishment of the existing buildings; addressing on-site ecological impact through biodiversity net gain, urban greening, reducing on-site water use, rainwater harvesting and exploring the reuse of waste water; significant reuse and refurbishment of the existing building, and; efficient use of materials, integrating circular economy principles and the use of responsibly sourced materials.

Flood Risk and Drainage

6.90. Planning policy at all levels seeks to avoid inappropriate development in areas at risk of flooding by directing development away from areas at highest risk.

6.91. LP Policy SI12 'Flood risk management' requires development proposals to ensure that flood risk is minimised and mitigated, with any residual risk appropriately addressed. In addition, Policy SI13 (Sustainable drainage) requires new development to incorporate Sustainable Drainage Systems (SuDS) to achieve greenfield run-off rates and to manage surface water run-off as close to its source as possible. These objectives are echoed in LP Policies 115 'Reducing flood risk' and 116 'Sustainable urban drainage systems'.

6.92. In support of this application, a site specific Flood Risk Assessment (FRA) has been prepared. This confirms that the site is located in Flood Zone 1 and therefore has an annual probability of fluvial flooding of less than 1 in 1000 (0.1%). The site is therefore at low risk of flooding from river flooding, both at present and in the future.

6.93. Environment Agency mapping indicates that parts of the site are, however, at a higher risk of surface water flooding, particularly within the lowest-lying area of the site.

6.94. Geotechnical investigations have further identified site-specific drainage constraints, including:

- Low infiltration rates due to the presence of clay soils beneath the site.
- Operational defects within the existing drainage network, identified through CCTV survey work.
- Land drains beneath the grass pitches that have not been maintained since the 1960s.

6.95. It is noted that the existing drainage infrastructure is privately maintained and does not form part of Thames Water's adopted network.

6.96. As part of this application, works are proposed to significantly enhance on-site drainage through the incorporation of SuDS measures to effectively manage surface water, alongside the repair and modification of the existing below ground drainage network. The proportion of impermeable area within the application boundary will be reduced from 56% to 47% through the replacement of existing hardstanding with soft landscaping and permeable paving.

6.97. Surface water attenuation storage is also proposed to manage runoff and will be designed to accommodate a 1:100 year rainfall event plus a 40% allowance for climate change. The proposed SuDS strategy, as detailed within the Below Ground Drainage Report, demonstrates that the scheme accords with both LP and BLP flood risk and drainage policies.

Green Infrastructure and the Natural Environment

6.98. Chapter 15 of the NPPF is dedicated to conserving and enhancing the natural environment. Para. 187 states that planning decisions should, inter alia, contribute to and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains for biodiversity.

- 6.99. Chapter 8 of the London Plan addresses Green Infrastructure. Policies G1 'Green infrastructure' and G4 'Open space' seek to protect and enhance open spaces, while Policy G5 'Urban greening' promotes urban greening and encourages development to deliver more and better-quality green infrastructure. For predominantly commercial development, Policy G5 recommends a target Urban Greening Factor (UGF) score of 0.3. Policy G6 'Biodiversity and access to nature' relates specifically to biodiversity and requires development proposals to manage impacts on biodiversity and seek to secure measurable net biodiversity gain.
- 6.100. Chapter 5 of the Local Plan similarly seeks to protect and enhance the natural environment and requires new development proposals to be informed by sufficient and appropriate ecological information.
- 6.101. The proposed development has been comprehensively assessed in respect of its ecological impacts, Biodiversity Net Gain (BNG) requirements, and Urban Greening Factor performance.
- 6.102. To facilitate the development, seven trees will be felled and areas of vegetated garden land and modified grassland will be lost. However, this is more than offset by a comprehensive landscaping strategy, including the planting of 34 new urban trees and the creation of new areas of grassland, mixed scrub, and biodiverse features such as bioswales.
- 6.103. The submitted Biodiversity Gain Plan confirms that the pre-development biodiversity value of the Site, as at January 2026, is calculated to be 78.65 habitat Biodiversity Units (BU). Post-development, the proposals will deliver an on-site biodiversity net gain of 11.24%, exceeding the statutory minimum requirement of 10% as mandated by the Environment Act 2021.
- 6.104. In terms of urban greening, the landscaping strategy will achieve an Urban Greening Factor (UGF) score of 3.8 demonstrating compliance with London Plan Policy G5.
- 6.105. The application is supported by an updated Preliminary Ecological Appraisal (January 2026), which confirms that the Site functions as a green corridor linking local parks and gardens and supporting habitat connectivity for urban wildlife. The PEA assesses the potential for protected and notable species and identifies appropriate avoidance and mitigation measures in respect of bats, birds, badgers and hedgehogs.
- 6.106. In relation to bats, a Preliminary Roost Assessment identified three buildings with high roosting suitability, and dusk emergence surveys undertaken between July and September 2025 recorded no bat activity. Precautionary measures will be taken as appropriate.
- 6.107. Targeted bird surveys confirmed the absence of black redstart and peregrine falcon. Works with the potential to affect nesting birds will be undertaken in accordance with best practice, either outside the main breeding season (March–September) or subject to a pre-commencement nesting bird check by a suitably qualified ecologist.
- 6.108. A pre-commencement badger walkover survey is recommended, and precautionary measures will be implemented to protect hedgehogs, including timing ground-level vegetation clearance outside of the hibernation period.
- 6.109. Overall, the proposed development has been informed by comprehensive ecological assessment and incorporates appropriate avoidance, mitigation and enhancement measures in accordance with national, London Plan and Local Plan policy. Subject to the recommended conditions and licensing requirements, the proposals will not result in unacceptable ecological impacts and will deliver measurable biodiversity and urban greening benefits, including a policy-compliant biodiversity net gain, enhanced habitat connectivity and long-term ecological enhancements across the site.

Environmental Impacts

Noise

- 6.110. The NPPF states that new and existing developments need to be prevented from causing, or being put at an unacceptable risk of, noise pollution (Paragraph 187e).
- 6.111. LP Policy D14 'Noise' similarly seeks to ensure that development proposals minimise the existing and potential adverse impact of noise on, from, within or in the vicinity of new development proposals. BLP Policy 119 deals with noise pollution and requires plant noise limits to be 10dB below background levels at sensitive receptors.

- 6.112. A noise assessment has been submitted with this application which has examined both the existing noise environment, and the likely impact of the new development. The assessment finds that the main noise sources related to the refurbishment of the site and typical day-to-day usage, will come from:
- The introduction of air source heat pumps (ASHPs) sited to the west side of the Main Building, in order to provide a sustainable energy strategy for the site.
 - Smaller ASHP units will also be provided to the Athletics Hub building and Jubilee Stadium.
- 6.113. The noise modelling indicates that with acoustic enclosures, noise emissions will meet the noise limits set by BLP Policy 119. The assessment concludes that the noise impact is low and not significant.
- 6.114. Operational noise from sporting activities and traffic servicing the site are predicted to remain similar to current levels, with negligible impact expected from the refurbishment. As before, amplified music will be regulated by a premises license, restricting live performances to specific hours.
- 6.115. The development will implement best management practices to minimise temporary noise and vibration disturbances during construction activities.

Air Quality

- 6.116. The subject site is located in a declared Air Quality Management Area (AQMA), which primarily covers the northwest corner of the Borough. It was designated an AQMA due to high levels of nitrogen dioxide, caused from road transport.
- 6.117. LP Policy SI1 'Improving air quality' Part B states that in order to tackle poor quality, protect health and meet legal obligations, as a minimum development proposals must be at least Air Quality Neutral; and development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution. The Policy states that major development proposals must be submitted with an Air Quality Assessment to show how the development will meet the requirements of the Policy.
- 6.118. An Air Quality Assessment has been undertaken in compliance with this requirement set by the LP, and Policy 120 'Air Quality' of the BLP. This considers the air quality impacts arising from the construction and the operation of the proposed development. It finds that during the construction phase, the Site has the potential to generate dust nuisance. However, with the implementation of appropriate mitigation measures in accordance with the GLA's 'Control of Dust and Emissions during Construction and Demolition' SPG, including measures such as wheel washing, water suppression, site enclosure, and dust monitoring, the likelihood of nuisance dust episodes occurring at adjacent receptors is considered low to negligible. It is recommended that a dust management plan will be secured by condition to ensure these measures are properly implemented.
- 6.119. With regards to the operational phase, building emissions have been screened out from the air quality assessment as the development will use all-electric systems with no combustion-based heating or energy generation, other than an emergency backup generator. This can be excluded from the assessment, in accordance with GLA guidance, as it operates only occasionally. As a result, the project is air quality neutral for building emissions by default.
- 6.120. The assessment therefore concentrates on future traffic emissions, evaluating the impacts both on Site and at existing residential receptors in the vicinity. It demonstrates that predicted concentrations would be well below the relevant air quality objectives and as such the impact of the development on local air quality is assessed as negligible. The development therefore meets the air quality neutral requirements, and no mitigation is required during operation.
- 6.121. Subject to appropriate construction phase mitigation (which can be secured by condition), the proposed development accords with LP Policy SI1 and BLP 120 and is acceptable in air quality terms.

Planning Obligations Statement

- 6.122. As set out at Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended), and referenced at para. 58 of the NPPF, planning obligations must only be sought where they meet all of the following tests:
- Necessary to make the development acceptable in planning terms.

- Directly related to the development.
- Fairly and reasonably related in scale and kind to the development.

6.123. As identified in this Statement and the other application documents, the CPNSC development will deliver a range of direct heritage, sport and sustainability planning (and public) benefits inherently within the scheme. Accordingly, there is no requirement for any planning obligations for this application and none would meet the above legislative test.

7. Conclusion

- 7.1. The Crystal Palace National Sports Centre (CPNSC) is an important strategic sports facility for London. It was built in 1964 as one of five national sports centres and comprises a series of indoor and outdoor sporting facilities within landscaped grounds. The Site sits wholly within Crystal Palace Park; itself a significant site derived from the Crystal Palace itself and its cultural heritage.
- 7.2. This application proposal a series of positive interventions to the CPNSC by the Greater London Authority that rationalise and declutter the Site around the three themes of heritage, sport and sustainability. Key elements of the proposal comprise:
- Improving links and accessibility across the Site and tying in with the Park Masterplan.
 - Decluttering the Site, removing unsympathetic elements and restoring parkland.
 - Improving the quality and choice of sporting facilities for all.
 - Restoring, enhancing and celebrating heritage assets.
 - Improving energy performance and the long-term sustainability of the Site.
- 7.3. The proposals have been designed to fully integrate with and complement the Park Masterplan that is being brought forward by the London Borough of Bromley (LBB, and landowner of the wider Park) and the Crystal Palace Park Trust.
- 7.4. The submission of this application follows extensive pre-application engagement with LBB as Local Planning Authority and key statutory consultees and landowners, as well as engagement with the local community (as set out in the Statement of Community Involvement) and the scheme has evolved in response to this process (as set out in the Design and Access Statement and Heritage Assessment).
- 7.5. This Planning Statement has assessed the proposed development against the key development plan policies, National Planning Policy Framework (NPPF) objectives and other material considerations. It has identified how it will directly respond to policy requirements and deliver significant benefits to the community. The proposals will deliver planning and public benefits that specifically respond to social and environmental objectives in the NPPF (para. 8):
- Reconnecting and integrating the Site with the wider Crystal Palace Park to the benefit of the natural and built environment, strengthening the Site's unique identity through its relationship between sport, landscape and public amenity. This is achieved through sensitive design interventions, wayfinding, landscape repair and improved permeability.
 - Supporting healthy communities through the improvement and creation of modern, inclusive and accessible sports facilities in an accessible and inclusive environment, removing barriers to participation.
 - Provision of significant new public open space including a new Sports Plaza and restoration of parkland, contribution to health, well-being, social interaction and planning objectives for Metropolitan Open Land.
 - Delivering significant heritage benefits, most notably the protection and celebration of the Grade II* listed CPNSC Main Building through ensuring all interventions enhance legibility, architectural clarity and the original design intent of the 1964 building and its setting.
 - Re-establishing the CPNSC as a national and international centre of sporting excellence, capable of hosting training, competition and community programmes across aquatics, athletics, pitch and court sports.
 - Improving the operational efficiency and long-term sustainability of the CPNSC through the sensitive incorporating of low-carbon design principles, energy upgrades and improved public realm connections.
- 7.6. Individually and collectively, these benefits are significant and should be given substantial positive weight in the planning balance.
- 7.7. As identified in the Heritage Assessment, the proposed development will result in some specific harm to designated heritage assets:
- Crystal Palace National Recreation (Sports) Centre (Grade II* Listed Building):
- Physical and visual installation of glazed environmental screen within main volume (low level).

- Physical reconfiguration of and fabric removal to two internal pools in pool hall (low level).
- Re-planning at centre of plan, including installation of two new lifts within former squash courts, and relocation of wet changing facilities, with associated removal of remainder plan form of courts and fabric of lower stand (medium level).
- Replacement of external glazed fenestration and curtain walling (low level).
- Removal of historically associated Lodge buildings from park (low level).

Crystal Palace Park Registered Park and Garden (Grade II*) and Crystal Palace Park Conservation Area:

- Removal of Lodge buildings as associated with postwar phase of park historically (very low level).
- 7.8. The Heritage Assessment identifies the above heritage harm to be 'less than substantial' in NPPF terms. Specifically, the harm to the CPNSC Main Building is at the lower end of less than substantial harm and the harm to both Crystal Palace Registered Park and Garden and Conservation Area is at the very lowest end of less than substantial harm. In accordance with NPPF para. 215, these 'harms' should be weighed against the public benefits of the proposal.
- 7.9. The Lodge is a non-designated heritage asset and its demolition will result in harm requiring a balance judgement in accordance with NPPF para. 216.
- 7.10. Where necessary, for example in respect of temporary construction impacts on air quality, appropriate mitigation will be provided to minimise any potential adverse impacts.
- 7.11. With due regard to the relevant NPPF heritage tests, as reflected in local policies, and as part of the overall planning balance of the proposals, the public and planning benefits of the proposed development identified above significantly and demonstrably outweigh the identified heritage harm.
- 7.12. Furthermore, there are many material considerations weighing heavily in favour of the proposed development, most notably its wider contribution to healthy and active lifestyles, planning history that has previously approved development with the same planning principles, boost to the local economy and its overall regenerative benefits.
- 7.13. Overall, the CPNSC proposals are fully in accordance with the Development Plan as a whole, fully complying with the key strategic sports, health, heritage, access and sustainability objectives, the most important policies to the determination of this application. Accordingly, and in accordance with NPPF para. 11, the proposals are in accordance with the Development Plan and should be approved without delay.
- 7.14. In respect of the proposed works to the Grade II* listed CPNSC Main Building, as comprehensively detailed in the Heritage Assessment, the proposals will preserve (and enhance) the Main Building and its setting in heritage terms and therefore meet the requirement of the Planning (Listed Buildings and Conservation Areas) Act 1990 to do so.
- 7.15. In summary, the proposals represent a once-in-a-generation investment to revitalise and modernise the CPNSC, a nationally significant sporting complex, ensuring it can continue to serve both community and elite-level sport in the 21st Century, whilst enhancing the heritage and landscape qualities of Crystal Palace Park to align with the broader masterplan delivered by the London Borough of Bromley. The proposed development of the Site will revitalise CPNSC as an open, welcoming and sustainable sporting campus that respects its heritage while transforming its ability to serve future generations.