

**LONDON BOROUGH OF BROMLEY**  
**TOWN PLANNING**  
**RENEWAL AND RECREATION DEPARTMENT**

**DELEGATED DECISION**

**21/05842/ADJ**

**Russell Penn**

**Land To The East Of The Railway  
Beckenham Place Park  
Beckenham SE6  
Lewisham Council**

**Description of Development**

The redevelopment of the existing fields into a flood water storage area to reduce flooding, along the River Ravensbourne, together with the provision of higher quality playground equipment and playground redesign, removal of changing room block, retention of existing nursery building, bmx and skateboard tracks, reprofiling of areas along the River Ravensbourne to provide easier access, reusing earthworks on site to create activity and play opportunities, Construction of a cafe building (c 95m<sup>2</sup>) within the park and the removal of groups of trees within park to aid in proposal redesign at Land to the east of the railway, Beckenham Place Park Beckenham SE6 CONSULTATION BY LONDON BOROUGH OF LEWISHAM

**Proposal**

A planning application has been submitted to London Borough of Lewisham for "The redevelopment of the existing fields into a flood water storage area to reduce flooding, along the River Ravensbourne, together with the provision of higher quality playground equipment and playground redesign, removal of changing room block, retention of existing nursery building, bmx and skateboard tracks, reprofiling of areas along the River Ravensbourne to provide easier access, reusing earthworks on site to create activity and play opportunities, Construction of a cafe building (c 95m<sup>2</sup>) within the park and the removal of groups of trees within park to aid in proposal redesign at Land to the east of the railway, Beckenham Place Park Beckenham."

The application is a consultation by London Borough of Lewisham.

**Location and Key Constraints**

Beckenham Place park is located beyond the northern boundary of the LB Bromley within LB Lewisham. The southern boundary adjoins urban areas north of Beckenham and Ravensbourne Station is located close to the park. Ravensbourne Avenue within LB Bromley provides an access route into the park along this unmade and unadopted road.

**Comments from Local Residents and Groups**

Representations have been received from nearby owners/occupiers which can be summarised as follows:

Objections:

LB Bromley has been forwarded an objection raised from householders of 208-222 Ravensbourne Avenue (14 households along the unmade section of Ravensbourne Avenue) sent to LB Lewisham raising concerns with regard to highways and transport issues; the redesign of the southern entrance to the park via Ravensbourne Avenue; and water and drainage issues.

#### Local Groups

Ravensbourne Valley Residents Association have raised concerns regarding the access from Ravensbourne Avenue in respect of the unmade road and impacts to parking and highway safety. The LB Lewisham Officer is advised to review this representation available online under ref 21/05842/ADJ.

#### Local Councillors

Members have raised concerns with respect to the impacts of parking to roads within LB Bromley and have requested that considerable care will be taken to study the possible impact of these proposals on Bromley residents in the area.

Please note the above is a summary of objections received and full text is available on the Council's website.

#### Policy Context

Section 70(2) of the Town and Country Planning Act 1990 (as amended) sets out that in considering and determining applications for planning permission the local planning authority must have regard to:-

- (a) the provisions of the development plan, so far as material to the application,
- (b) any local finance considerations, so far as material to the application, and
- (c) any other material considerations.

Section 38 (6) of the Planning and Compulsory Purchase Act (2004) makes it clear that any determination under the planning acts must be made in accordance with the development plan unless material considerations indicate otherwise.

The National Planning Policy Framework was revised and published on 20th July 2021. The development plan for Bromley comprises the London Plan (March 2021) and the Bromley Local Plan (January 2019). The NPPF does not change the legal status of the development plan.

#### London Plan (March 2021)

- D3 Optimising site capacity through the design-led approach
- D4 Delivering good design
- D5 Inclusive design
- S5 Sports and recreation facilities
- SI12 Flood Risk Management
- SI13 Sustainable drainage

#### Bromley Local Plan

- 21 Opportunities for Community Facilities

- 26 Health and Wellbeing
- 32 Road Safety
- 33 Access For All
- 37 General Design of Development
- 115 Reducing Flood Risk
- 116 Sustainable Urban Drainage Systems (SUDS)

## Planning History

The relevant planning history relating to the application site is summarised as follows:

17/02423/ADJ: Request for Scoping Opinion submitted under Regulations 13 of the Town and Country Planning (Environmental Impact Assessment) Regulations (As Amended) 2015 in respect of a proposed flood alleviation scheme within the catchment of the River Ravensbourne, comprising of: works to raise low points in existing river walls between Ladywell and Lewisham town centre; the formation of a floodwater storage area within Ladywell Green (land bounded by Slagrove Place, SE13); the realignment of the River Ravensbourne and formation of a flood storage area at Beckenham Place Park, BR3, together with associated structures and landscaping works. Consultation by London Borough of Lewisham.  
No objection - 04.07.2017

## Considerations

The main issues to be considered in respect of this application are in respect of this application are the impact(s) of the development on land and properties within the London Borough of Bromley.

## Metropolitan Open land (MOL):

Beckenham Place Park is designated MOL and under London Plan 2021 afforded the same status and protection as Green Belt.

As part of the upgrading of youth facilities at the Downham Gate entrance the proposal involves the removal of a 625m changing rooms block and the development nearby of a smaller building providing a café including toilets.

## Sports Facilities:

The application site, which lies approx. 320m from Bromley border, suggests enhanced sports provision. The D&A statement para 1.1 advises that the former playing fields are no longer used for formal pitch sports, para 7.18 indicates 4 pitches - one of which to be located within the 'sunken lawn' (flood storage area)

This proposal reflects the approach of Bromley Local Plan to enhanced community facilities (including recreational facilities) as set out in, Policy 21 Opportunities for Community Facilities (notably clause d) and Policy 26 Health and Wellbeing (notably clause a). However, the proposals involve the removal of changing room facilities potentially undermining the use of the proposed pitches and appears contrary to London Plan Policy S5c.

## Community/Youth:

The existing and enhanced youth facilities in the NW, Downham Gate corner (650m from Bromley properties) will significantly benefit from play improvements.

The Downham Gate youth play facilities also lie just over 800m from Bromley properties in Downham which lie within the 'Ravensbourne Plaistow & Sundridge' Renewal Area. An area with specific deprivation in respect of 'income deprivation affecting children'

Whilst the distance to these properties, which follows the Green Chain Walk, marginally exceeds the recommended Mayoral SPG max walking distance to play facilities for 12+yrs it forms part of the more extensive offer within the Beckenham Place Park which would therefore be potentially accessed by Bromley children from the Renewal Area.

Whilst the application lies outside the Renewal Area and indeed the Borough. Subject to the re-provision of changing facilities the proposals would reflect the spirit of relevant Bromley Renewal Area Policies 13, 14 and 19 maximising opportunities for enhancement and improvement of environmental assets providing social and environmental benefits (and through the minimising of flooding economic benefits).

Notably Policy 13f refers to co-operation with adjacent boroughs to maximise benefits of proposals with cross borough impacts.

#### Biodiversity:

The proposal is primarily intended to alleviate flood risk downstream on the River Ravensbourne, however the proposal also creates new habitats including the wetlands as a consequence of the deliberate flooding of parts of the site.

Proposals to reduce flood risk downstream would be supported by Bromley Local Plan Policy 115 and London Plan SI12 clause G which highlights the multiple benefits of natural flood management.

Although not directly adjoining LB Bromley land, the proposal poses an opportunity to explore ecological corridors, linking to the MOL land to the south and within Bromley. The Preliminary Ecological Appraisal and Bat Survey both identify potential harm that may be offset to provide a net gain, however no Phase 2 surveys have been provided to fully address these risks. There is also no information submitted that describes the positive impacts on nature recovery and the wider network of habitats. It would be worthwhile consulting the Bromley Biodiversity Partnership for their views in this regard, as the continued functioning of the site as a wildlife corridor should not be compromised.

#### Design

The plans submitted to LB Lewisham indicate that there will be no change to the design of the gate to the park from Ravensbourne Avenue. This is accepted.

#### Highways

London Plan and Bromley Local Plan Policies encourage sustainable transport modes whilst recognising the need for appropriate parking provision.

The existing site is approximately 17ha bounded by the railway line to the west and the river to the east. It is currently relatively flat mowed grass with mature trees and

vegetation along its perimeter. The proposal aims to make the most of Beckenham Place Park as a river corridor and providing valuable storage for flood waters.

The application information is showing the access from Ravensbourne Ave/ Crab Hill as the main access.

LB Lewisham is advised that Ravensbourne Ave is an unadopted highway and unmade. Since the street is not made up to the Council's adoption standards, it is possible that heavy loads may cause particular damage to the street, but the repair of such damage would be a matter between the owner of the street and the operator of the vehicle involved, unless the frontages could show that they are under an obligation to keep the street in repair.

It would be a good idea to encourage the use of alternative points of access to and egress from, the Park, for heavy loads, making use of made-up and maintainable highways.

LB Lewisham is also advised of the following issues:

- o How the applicant is proposing to use the unmade Ravensbourne Avenue.
- o The impact on Bromley residents, mainly in regard to parking near the southern entrance in Ravensbourne Avenue.

LB Lewisham could also not carry out any works to the unadopted highway without the consent of Phoenix Housing, as owners of the soil of this section of Ravensbourne Avenue, and the approval of LB Bromley, as Highway Authority for the street.

There is no right to park on any highway, even in the absence of waiting restrictions, the public's right being to pass and repass along the highway, but such parking is usually tolerated, subject to its duration and it not causing an actual obstruction of the highway. Whilst it is not known if Lewisham will be able to carry out any works in Ravensbourne Avenue, it may be able to, in which case it must be expected that there would be some disruption to such parking as is tolerated in the street, at least temporarily.

The applicant must provide LB Bromley Highway Authority with a Construction Management Plan as stated above avoiding Ravensbourne Avenue for the reasons given above.

## Conclusion

On the basis of the submitted application details LB Bromley objects to the proposal based on the unclarified impacts on highway conditions at and within Ravensbourne Avenue and nearby roads in LB Bromley. The London Borough of Bromley respectfully requests that LB Lewisham carefully considers the LB Bromley comments.

The London Borough of Bromley is not the determining authority and it is for LB Lewisham to conclude on these matters insofar as they affect land and properties to the south of the park in LB Bromley.

## Decision

Raise Objections

**For conditions or grounds of refusal please refer to the Decision Notice**

