

North Copers Cope Road Action Group

Mr J Hamilton and Mr T Horsman
Planning Department
LB Bromley Council
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Bromley BR1 3UK

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SENT BY EMAIL: jake.hamilton@bromley.gov.uk and Tim.Horsman@bromley.gov.uk

Dear Mr Hamilton and Mr Horsman

**Planning application DC/19/04644/FULL1
Crystal Palace Football Club – Copers Cope Road, Beckenham BR3 1NZ**

19/04644/FULL1 - Erection of a covered full-size football pitch, creation of an artificial full-size pitch with floodlighting, and regrading of the site to create a full-size show pitch with spectator seating & six training pitches (two full-size, two 3/4 size & two half-size). External alterations and lobby & link extensions to the existing buildings. Installation of maintenance/store sheds, water tanks and under-pitch infrastructure. Associated highway and landscaping works. - National Westminster Bank Sports Ground Copers Cope Road Beckenham BR3 1NZ

I am the Chair of the North Copers Cope Road Action Group (NCCRAG) and I set out below the views of NCCRAG in relation to the above planning application.

These views have been discussed and endorsed by all the members of the NCCRAG Committee.

The North Copers Cope Road Residents Association (NCCRAG)

NCCRAG was established in 2004 and is recognised by Bromley Council as an accredited Residents' Association.

We review and comment on planning applications and developments which could have an impact on residents of north Copers Cope Road and, more broadly, on the character and nature of the local area and community.

The aims and objectives of NCCRAG are:

“The preservation of the local built environment and the conservation of local woodland and open space and their integrity for the benefit of the residents of North Copers Cope Road and the wider communities of the town of Beckenham and South East London. The preservation of the integrity of the local built environment.”

In 2015 we submitted a proposal to Bromley Council that north Copers Cope Road should become an Area of Special Residential Character (ASRC).

This was accepted for part of the north Copers Cope Road area when Bromley Council adopted its current Local Plan in January 2019.

The ASRC includes all the Victorian/Edwardian houses on the north western side of Copers Cope Road, numbers 119 to 169, which means that all the residential properties that abut the CPFC Academy land are within the recently established ASRC

The current proposal from Crystal Palace Football Club (CPFC)

Crystal Palace Football Club (CPFC) has acquired the legal right to occupy, we believe for the next 75 years, the Metropolitan Open Land (MOL) on the north western end of Copers Cope Road, the subject of this planning application,.

CPFC is seeking to develop the site with the purpose of attaining Category 1 status for its Football Academy to assist the expansion and development of the Academy and CPFC more generally and to secure the club's future in the Premier League. CPFC's Academy is currently Category 2.

The Premier League's Elite Player Performance Plan (EPPP) which governs the operation of Football Academies was introduced in 2012 following consultation with the English Football League (EFL) with the aim of producing more, and better, home-grown players. The EPPP document is available online at EFL.com at this link [2019/20 Charter for Academy Players and Parents: Click here to view the full document](#) .

The Academy system is explained on the EFL website as follows:

"In 2012 the English professional game adopted the processes, principles and criteria of the Elite Player Performance Plan (EPPP) with the aim of creating a world leading Academy system.

The fundamental principles of the EPPP include increasing the number and quality of Home Grown Players, creating more time for players to play and be coached and improving coaching provision.

A system of measurement and quality assurance has been established whereby Academies are independently assessed with resultant recommendations determining the category status awarded to each Academy.

There are 4 categories of Academy. Category 1 to 3 Academies register players from the U9 age group through to professionals whereas the Category 4 model is a late development model operating from the U17 age group upwards. Category 1 is the highest status of Academy."

We absolutely support the ambition of CPFC to provide an environment where young people can realise their footballing potential and CPFC can remain one of the best football clubs in the UK underpinned by a successful Academy set-up.

If there is appropriate, and sustainable, development on this site, it will also secure the continued use of the MOL land for sporting activity which we thoroughly support.

However, at the moment, we have a number of serious concerns about the current proposals and, in particular, we believe that the height, mass and floor area of the proposed indoor pitch building is excessive and far too large for its required purpose.

The planning justification put forward by CPFC does not support the case for such a large building to be erected.

In this letter we have set out our concerns about the indoor pitch building and also about the other major building(s) on the site which will provide maintenance buildings, water storage tanks and a pumping station (what we describe in this letter and its Appendices as “Grounds Maintenance Complex”) and will be in close proximity to the dwellings on the western side of Copers Cope Road from 119 upwards.

We also set out concerns about other aspects of the planning application.

An acceptable proposal should reflect the needs of CPFC, address the relevant planning considerations and take account of the views of local residents and the interests of the wider community.

We have set out in Appendix 1 a detailed planning analysis as to why the arguments in the CPFC Planning Statement do not support the current planning application.

We have set out in Appendix 2 our desk top research findings with details of what other London based clubs have done to obtain Category 1 and 2 status for their own football clubs and Academies.

Our analysis clearly demonstrates that comparable London football clubs have been able to satisfy their Academy ambitions but have built, or obtained permission to build, much smaller indoor pitch buildings than the building proposed by CPFC. Their buildings are generally situated on much larger sites where the impact is considerably less than would be the case on the CPFC site.

The two most iconic London based clubs, Arsenal and Chelsea, have not felt that a building more than 11 metres high is needed for them to realise their own ambitions!

NCCRAG conclusions

In the light of our concerns we ask Bromley Council to refuse the current application

We believe that development of the site for use by the CPFC Academy is the right way forward for CPFC, local residents and the community more broadly.

However, in our view, CPFC has not at the moment put forward a credible and appropriate planning proposal to achieve this objective.

We ask that the current planning application is rejected by Bromley Council and that Bromley Council invite CPFC to put forward a properly detailed and appropriate proposal.

Online support for the proposal

At the time of writing, 20 December 2019, there are nearly 500 “NEIGHBOUR COMMENT (SUPPORT) SUBMITTED ONLINE” postings on the Bromley Council website.

People who post comments on the website are offered four descriptors: local resident, neighbour, other or Residents Association but irrespective of the choice made all comments appear as NEIGHBOUR COMMENT. There is clearly a fault on the Bromley Council website.

The favourable comments have, in the main, been submitted by CPFC fans and are overwhelmingly by males (over 90%) and contain very general statements of support for the planning application “because it will be good for CPFC”.

Those commenting have no doubt been prompted to do so by a post CPFC have put on their Academy website:

“If you live locally and would like to see this fantastic facility come to fruition, please **back the club’s plans now by clicking here (Bromley Council Planning Portal)**. If permission is granted, local young footballers will be given the best opportunity to develop into professional footballers whilst receiving an exceptional education at our Bromley base. The site itself will be safe and secure, whilst also ensuring no commercial development is possible on the green space.”

Very few of those submitting comments live in the local area (less than 3%) or even in the wider Beckenham area (11%). Most live outside the borough of Bromley (over 60%) with respondents living as far afield as Ireland, Ghana and Western Australia!

They are all described as “neighbours” but that is because there is a fault on the Bromley Council website.

But that is not the real point.

The current development proposal is a good idea in principle: it just needs to be properly detailed with **all** the necessary plans, it needs to contain valid and proper professional assessments based on the right premises for demonstrating what damage might be caused to the MOL, the ASCR, the TPO woodland MOL and the amenity which residents enjoy in their homes.

NCCRAG agrees that the development of the site can enable CPFC to retain its preeminent footballing status and it can enhance its Academy status. But the current proposal is not the way to achieve this.

The question is: HOW CAN THIS BEST BE ACHIEVED?

We have set out in this letter, and its Appendices, significant reservations and concerns about the current proposal. We believe these are so serious that we are asking Bromley Council to reject the current planning application.

If Bromley Council accepts that the current planning application is unacceptable it should refuse the application but then encourage CPFC to come back with a proposal which addresses all the major issues which we have covered in this letter. Plus other issues that the Council would like to raise.

All of us want an optimum solution but at the moment we have reluctantly concluded that CPFC has yet to provide it.

What does CPFC need to do now?

We do not believe that CPFC has made the case for such a massive indoor pitch building as is currently proposed.

Any, revised, CPFC proposal must set out, clearly, what is required to become a Category 1 Academy football club, the evidence of what other clubs have done to achieve this and what is appropriate on this particular MOL land which is considerably smaller than the sites used by other, London based, clubs.

CPFC needs to set out, clearly, what any new indoor pitch building will look like and its potential impact.

The CPFC proposal also needs to be assessed in the light of what is, in practice, required to become a Category 1 Academy.

The evidence set out in Appendix 2 shows that Fulham Football Club reduced significantly the size of its proposed building after their own public exhibition meeting.

We have also set out in this letter other significant concerns and these also need to be addressed by CPFC.

What is currently missing from the planning application

There are 747 pages of documentation published on the Bromley Council website in relation to this planning application but this masks the absence of fundamental documents, and data, that are crucial in order to fully assess the merits of the application.

There are such a large number of gaps in the information contained in the planning application that we have set out what we consider to be the main missing documents in Appendix 3.

Planning considerations

There is a presumption against inappropriate development on MOL land unless very special circumstances can be demonstrated.

We believe that the new building does represent inappropriate development and this is the view that CPFC have also taken because the Centro Planning Statement at 5.12 page 19 admits that the proposal is by definition inappropriate development and they have then sought to demonstrate that in this particular case there are very special circumstances.

CPFC is, in addition, required to demonstrate that the very special circumstances “clearly outweigh the harm by reason of inappropriateness or other harm.” MOL Policy G2

It can never be the case that the mere existence of very special circumstances means that any building or structure can be built on a particular site.

We have set out in Appendix 1 a detailed, technical, analysis of the CPFC planning statement.

We do not believe that even if the Council agree that very special circumstances exist in this particular case that they merit a building as large as is currently proposed. Indeed the current very special circumstances argument is further undermined if, as we are led to believe, CPFC are proposing such a massive indoor pitch building so that they can rent it out to outside football clubs. We note that if CPFC did rent out the facility this would be in breach of the EPPP rules which require such buildings “**to be for the exclusive use of the Academy at all times**”.

We ask that this application is refused and CPFC should be invited to put forward a revised proposal which properly addresses all the issues that arise in this case.

The new indoor pitch building – current proposal

The proposed new indoor pitch building is 19 metres (62ft) high at its apex and it is 81 metres wide and 116 metres long (266ft x 381ft).

To put this in a local context the proposed new building is considerably higher than the ridge of the main (nave) roof of St George's Church in central Beckenham! That is 56ft and 6inches above the floor.

One online respondent provided equally impactful comparisons:

“...When I go to Europe, I often fly on an Airbus 320, which seats 150 passengers. That plane's dimensions are 38m long, 36m wingspan and 14m high. So you accommodate six of these planes in this space. Indeed, if the roof had been one metre higher, the building could have accommodated President Trump's Air Force One (dimensions 71m long, wingspan 60m, height 19.4m).

For those who prefer more mundane modes of travel, a London New Routemaster bus is 11.23m long, 2.52m wide, 4.4m high. So you could get 270 London Routemaster buses in this space.”

In the Planning Statement, paragraph 2.38, there is mention of other clubs that have built new facilities in Green Belt or MOL land over the past two decades. But there is no mention of the size of their particular facilities so we had to carry out our own online desk top research to find out what sort of buildings they have put up: the results of our research are set out in Appendix 2.

These other clubs have been mindful of the potential impact of any new buildings on Green Belt / MOL land and their buildings have been considerably smaller than the new indoor pitch building proposed by CPFC.

We note that CPFC has not provided any information about the buildings put up by other London clubs.

When it applied in 2015 to extend the Pavilion on its land on the other side of Copers Cope Road, the site used by its first team, it provided detailed information about the large pavilions used by Brighton and Hove and QPR to demonstrate that it also required a much larger building than the one currently on the site.

That planning application was comprehensively rejected at a Planning Committee meeting in 2017.

The impact of the new indoor pitch building

There are a number of photographs in the LVA and MOL Review document and separately in the two Verified View documents.

But there are no images of what the new building will actually look like.

There is an “artist's impression” view on page 39 of the Design and Access Statement. But that is shown from within the site with the existing buildings in the foreground which has the effect of minimising the relative size of the buildings furthest away: which in this case is the new indoor pitch building.

There are no views of the new building from the perspective of Copers Cope Road, Kent County Cricket Ground or the flats adjacent to that ground, Pavilion House and Gallery House.

This is where the new building will have the greatest impact.

Some of the Verified Views, second document, do show a green line in the sky to mark the top of the new building but that gives no idea of what it would actually look like.

The documents also make no mention of the fact that there are 34 flats in Gallery House and Pavilion House, on the edge of Kent County Cricket Ground of which the vast majority will have a direct view of the new building from their homes.

There are also thousands of cricket spectators who attend cricket matches at the Kent County Cricket ground, the other side of Copers Cope Road, each summer.

Copers Cope Road is an extremely busy road, and an emergency vehicle “blue light route”, which has between 500,000 and 1 million traffic movements per year. Unlike the equivalent structures of other London football clubs any structure on this site will have an enormous visual and planning impact.

There need to be CGIs (Computer Generated Images) of the new building so that it is possible to gauge the visual and planning impact on the MOL land and the local environment.

We do not believe that the current application provides sufficient detailed visual information to determine the impact, and effect, of the new structure.

NCCRAG comments on the proposed indoor pitch building

In the time available, 21 days from the notification to some local residents on 29 November, we have carried out a detailed review of the 747 pages of supporting documentation that was uploaded to the Bromley Council website.

Our analysis has allowed us to conclude that the proposed new building is too massive and that other aspects of the proposals need further work on them as well as clarification of important issues that we have identified.

The CPFC proposal for their new building is an outlier as the proposed new building would be very considerably larger than other equivalent buildings proposed, or erected, by other London football clubs.

Even if that was not the case the positioning of the CPFC building means that it is right on the edge of the MOL land and much more visible than other football club’s equivalent buildings.

The actual impact is impossible to gauge on the basis of the documents currently submitted by CPFC. There needs to be proper evidence of the impact of the new building on the flats in Pavilion House and Gallery House and on Copers Cope Road more generally.

We ask that Bromley Council refuse the current planning application and work with CPFC to enable CPFC to come back with an alternative proposal that achieves their objective to gain Category 1 Academy status but which is, at the same time, sympathetic to the MOL land in which any new building will stand and to the adjoining Area of Special Residential Character as well as reducing the impact on the nature and character of the neighbourhood more generally.

Further considerations – planning and other

We have other serious concerns about the current planning application which we believe has been submitted with key issues insufficiently thought through or elaborated.

For instance there is no substantive information about the attenuation tanks or the pumping system to support the removal of flood water and the irrigation of the site, in what we have termed the “Grounds maintenance complex” and the only information about the water storage tanks relates to their indicative locations and dimensions.

Nor is there any information on the impact of any new arrangements for the properties which abut this part of the MOL site.

Our other key concerns are set out in Appendix 6 and cover:

- Car parking;
- Other new buildings: maintenance buildings, water (attenuation) tanks and pumping station, the “Grounds Maintenance Complex” and spectator seating;
- Existing building;
- Show pitch and stand;
- Floodlighting of the new artificial 3G pitch;
- Noise;
- Light pollution;
- Pitch locations;
- Trees and ecology;
- Visual imagery – the CPFC eagle;
- Condition (these are preliminary and will be updated in early 2020)

Section 106 Agreement and community involvement

Residents find it surprising, if not astonishing, that there is no mention of a section 106 agreement anywhere in any of the 747 pages of documentation and that CPFC would appear not currently to be offering one.

If CPFC is proposing to invest £20m in the development of this MOL land, with significant planning harm to the MOL why has Bromley Council not discussed the benefit that should, as a quid pro quo, be provided for the local community.

Surely this should have been raised and, at the very least, some outline agreement reached during the pre app stage which has preceded the formal planning application.

There are some warm words about the extent to which the new facilities will be available for use by local groups and schools but it is very difficult to be clear as to what exactly is being proposed in order to assess whether it is acceptable and what real benefits local residents might gain. This is another aspect of the proposal that needs to be more clearly articulated if CPFC is asked to return with a better, and clearer, proposal.

Finally – what happens if CPFC were to quit the site

We agree that CPFC are going to need a new indoor pitch building on this MOL land in order to satisfy EPPP Academy rules.

If new buildings are erected on the site then there needs to be a condition to ensure that their footprint cannot be used by any subsequent owner, or leaseholder, to justify their replacement by other buildings, for instance blocks of flats, occupying a similar footprint.

If for whatever reason CPFC were to quit the site then there should be a condition that the new buildings are taken down, any demolition material and debris is removed and that part of the site is returned to grass.

We are mindful that In the period since 2012 some football clubs have closed their Academies. If CPFC were to do the same in the future and vacate this MOL land then the current “very special circumstances” are unlikely to be relevant for a future owner/leaseholder of the site. So we need to have conditions in place that will return the site to its *status quo ante*.

Circulation of this paper to Bromley Planning Committee members

We should be grateful if you would circulate copies of this letter to all members of the planning committee which is to consider the current application.

A member of NCCRAG will speak against the application and ask the relevant Committee to refuse the current application.

If the Committee agrees with our views on the current application then the planning committee should ask CPFC to submit a new application which addresses all the issues raised in this letter and other matters considered relevant by the planning committee.

Yours sincerely



Ian Young
Chair, North Copers Cope Road Action Group

Appendix 1 – CPFC planning statement – a detailed analysis

Appendix 2 – Crystal Palace Football Club (CPFC) Youth Academy – Planning Statement – indoor pitch building

How large does the building need to be?

Appendix 3 – What is currently missing from the planning application?

Appendix 4 – Noise and the CPFC Noise Impact Assessment

Appendix 5 - Conditions that could be applied when Bromley Council approves a planning application for this MOL site

Appendix 6 – Further considerations – planning and other

The present letter has been copied to the following people whom we believe will be interested in its content:

Claire Brew, Case Officer Claire.brew@bromley.gov.uk

Alexa Michael, Chair, Bromley Development Control Committee
Alexa.Michael@bromley.gov.uk

Bromley Council

Chief Executive

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Stephen Wells Stephen.wells@bromley.gov.uk

Bob Stewart – MP Beckenham bob.stewart.mp@parliament.uk

North Copers Cope Road

Action Group

Appendix 1 – CPFC planning statement – a detailed analysis

The full description of the planning application on the Bromley Council website is:

19/04644/FULL1 - Erection of a covered full-size football pitch, creation of an artificial full-size pitch with floodlighting, and regrading of the site to create a full-size show pitch with spectator seating & six training pitches (two full-size, two 3/4 size & two half-size). External alterations and lobby & link extensions to the existing buildings. Installation of maintenance/store sheds, water tanks and under-pitch infrastructure. Associated highway and landscaping works. - National Westminster Bank Sports Ground Copers Cope Road Beckenham BR3 1NZ

The planning statement has a number of sections.

We consider each in turn to see whether the statement does what is required by planning legislation.

Section 2 introduces the site's location and characteristics, the proposals and the planning history of the site and other sites, both within and outside of LB Bromley, that are considered relevant to the proposals here.

Rather strangely in paragraph 2.4, the area is described as "interspersed amongst the various sports grounds in this area is residential development along Copers Cope Road and off Worsley Bridge Road."

The residential development cannot fairly be described in this way.

This is clear from paragraph 2.6- "On Bromley Council's Proposals Map, the site is located within Metropolitan Open Land (MOL), the South East London Green Chain² and within Flood Risk Zone 2/3."

The residential development is not within MOL.

Paragraph 2.7 identifies that "The purpose of the proposal is to attain Category 1 status for CPFC's academy."

There is no explanation of why a building of this size and particularly height is necessary.

There is in fact no such requirement.

Paragraph 2.8 identifies the main issue, namely the impact of the indoor pitch structure which "would measure approximately 116m long and 81m wide (GIA of 9,375m²), with a ridge height of 19m, connected to the existing 'Gambado' building with a small link extension."

From paragraphs 2.17 on, the planning statement assesses applications on other sites inside and outside the London Borough of Bromley.

This analysis simply highlights that the proposed indoor pitch structure is larger and more intrusive than any other. There are no relevant precedents.

Section 3 sets out the decision making framework, namely that the Planning Acts require a planning application or appeal to be determined in accordance with the adopted development plan for the area unless material considerations indicate otherwise.

Section 4 briefly deals with matters of economic growth and land use principles. This is essentially factual and not contentious.

Section 5 is the crux of the statement and discusses whether the development amounts to 'inappropriate development' within the Metropolitan Open Land (MOL), an assessment of the effect on openness, and the case for very special circumstances (VSC) to outweigh any effect on the MOL

Paragraph 5.8 accepts that the proposal is inappropriate development and that very special circumstances are required to justify the grant of permission.

However, this is expressed as if there is some doubt in the matter.

Paragraph 5.8 reads " The proposal for a new building adjacent to the existing 'Gambado' building to provide an indoor playing pitch, would be regarded as inappropriate development **as it does not strictly fall within any of the exceptions to 'inappropriate development' listed within NPPF paragraph 146 or Local Plan Policy 49.**" Our emphasis.

This is not an accurate description. The proposal is clearly inappropriate development.

Paragraph 5.9 considers the effect on openness.

Incredibly, an attempt is made to compare favourably an open- air recreational use, the Goals use, which is appropriate development with an inappropriate indoor recreational use.

No weight can be given to this comparison and indeed the fact that it is put forward serves only to undermine the credibility of the whole statement and analysis.

Paragraph 5.12 accepts that very special circumstances must exist to outweigh the harm caused to openness by reason of inappropriateness

The VSC case puts forward the following arguments to support VSC:

- The future prospects of CPFC within the Premier League and the need to develop a Category 1 Academy facility in order to continue the club's success;
- The facilities that a Category 1 Academy must provide as required by the Premier League and the specific "locational requirements" for such a facility;
- The benefits to the community from the CPFC's Palace for Life Foundation community programme;

None justify a building of this scale, size and height.

We have also been told informally by CPFC that the intention is to rent out the building to external clubs. That cannot be a justification for planning permission to be given for an over large building.

Again, in paragraph 5.9 an attempt is made to suggest that the proposal is similar, in terms of the effect on openness from the indoor pitch, to the part of the site that until most recently, was occupied by 'Goals'. This is simply not a sustainable argument.

Section 6 deals with matters relating to layout, design, height and appearance and effects on the character and appearance of the area, heritage and the amenity of nearby residential occupiers.

Section 7 reviews other related matters, such as transport, flood risk, air quality, noise and ecology.

The Statement draws conclusions in Section 8.

Paragraph 8.3 repeats the unsustainable claim that “as the indoor pitch amounts to inappropriate development within the MOL, a strong case of ‘very special circumstances’ is set out which demonstrably outweighs the harm to MOL.”

The NCCRAG concerns are as follows:

In the absence of falling into one of the policy exceptions, the proposal amounts to inappropriate development in terms of MOL national and local policy.

It therefore should not be approved except in very special circumstances as by definition it is harmful to MOL.

NCCRAG consider that the substantial level of harm that would arise from the development is not outweighed by any very special circumstances presented.

Very special circumstances to the extent necessary to justify a building of this size and height.

As such the proposal is not sustainable development and is contrary to the aims and objectives of the NPPF, the London Plan and the Local Plan.

In addition to the issue of MOL, London Plan and Local Plan policies reinforce the principles of the NPPF setting out a clear rationale for high quality design.

Local Plan policy sets out a list of criteria which proposals will be expected to meet. The criteria are clearly aligned with the principles of the NPPF.

These are: new developments to be imaginative and attractive to look at; complement the scale, form, layout and materials of adjacent buildings and areas; development should not detract from the existing street scene and/or landscape and should respect important views, skylines, landmarks or landscape features; the space about buildings should provide opportunities to create attractive settings and security and crime prevention measures should be included in the design and layout of buildings and public areas.

NCCRAG consider these criteria are not met.

North Copers Cope Road Action Group

Appendix 2

Crystal Palace Football Club (CPFC) Youth Academy – Planning Statement – indoor pitch building

How large does the building need to be?

Section 2 of the CPFC Planning Statement cites other clubs that have obtained permission for indoor pitch structures without providing details of the size of their structures – *the missing details are provided in this report*

The CPFC Planning Statement quotes at some length the cases of Fulham Football Club and Queens Park Rangers (QPR) which were both, within the past four years, granted planning permission for the development of their sites including the erection of a structure to enclose an indoor pitch.

No details are provided in the Planning Statement of the size of the structures for which planning permission was granted.

We do not believe the CPFC application can be adequately assessed without knowledge of what other football clubs have done to ensure they achieve the highest Academy rating while at the same time addressing MOL and other local considerations.

To the extent that we have been able to do so from public (internet) records this report will ensure that this important information is available to Bromley Council.

The Crystal Palace proposed indoor pitch building

“The indoor pitch structure would measure approximately 116m long and 81m wide with a ridge height of 19m” paragraph 2.8 Planning Statement.

This is 9,396 sqm and will cover 9%, or nearly one-tenth, of the total site of 10.6 ha.

At the exhibitions on 31 October and 1 November residents expressed the views that this was too large.

In an undated letter signed by Phil Alexander, Chief Executive, CPFC and distributed to some local residents on 3 December there is a statement that:

As a result of the feedback we have received at the exhibition, and at meetings with local stakeholders, the following changes have been made to the proposals we displayed:

- The height of the indoor pitch has been reduced to 19M”

There were other changes cited in the undated letter i.e. the onsite bowls club will get an extended lease, additional tree planting and the construction arrangements.

We note that when Fulham had an exhibition for local residents in 2015 and faced similar criticism about the height of the building enclosing their indoor pitch **Fulham reduced the height of the indoor pitch building from 18m to 13m.**

Fulham Football Club (Category 1 Academy)

Fulham applied to Kingston Council for planning permission in 2015 to enhance their existing facilities at New Malden KT3 6PT. This included the building of a new indoor pitch structure to replace the air dome for which permission had been granted in 2001. The reference is 15/15210/FULL.

Fulham were a Category 1 academy but were in danger of losing that status without an upgrade of their existing facilities.

There was a public exhibition in October 2015 and one of the key concerns raised by local residents was the size, height and visual impact of the proposed indoor facility.

To reflect these concerns Fulham reduced the height of the building from 18 m to 13 m and reduced the length from 94 m to 81 m but the width remained at 62.5m.

The Fulham pitch covers 5,062 sqm which is not much more than **50% of the size of the proposed CPFC structure.**

Put another way the CPFC proposed building covers **twice the area of the Fulham structure** and Fulham is a Category 1 club taking what it considers to be the necessary steps re its facilities to retain its premium status.

The Fulham site is 10.5 ha which is almost exactly the same as the CP site (10.6 ha) and it is also in a residential area but there are a number of mature trees round the perimeter of the site most of which have Tree Preservation Orders. There are far fewer trees along Copers Cope Road where the CPFC indoor pitch building is proposed to be sited and none of them are anywhere near the 19m height proposed by CPFC.

QPR (Category 2 Academy)

QPR first put in a planning application in 2012 and then a revised application in 2015, approved in 2016.

Ealing Council planning website - QPR planning application documents
<https://pam.ealing.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=ZZZW7CJMTA070>

Page 26 (it is not numbered) of the 166 page Design & Access statement provides a diagrammatic representation of the different elements of the site.

The indoor hall is shown as 3,250 sqm and the building height is shown as +12.5m above ground level.

This is about one-third of the size of the proposed CP building.

Other football clubs mentioned in section 2

Paragraph 2.38 of the CPFC planning statement mentions 7 other clubs but we have just looked at the indoor pitch buildings in the three London based clubs, Arsenal, Chelsea and Tottenham Hotspur.

We have also looked into the position at two other London clubs: Charlton Athletic and West Ham.

Arsenal (Category 1 Academy)

Arsenal built new facilities on their training ground at Colney, near St Albans in 1999 including an indoor pitch. Original application (Hertsmere Council 97/0985) but no documents are on the website except the decision.

Arsenal has a 57 ha site, which is more than 5 times the size of the CPFC site, and all the buildings are well screened. It is Green Belt.

We have not been able to find the height of the building but it is about the same as the adjacent two story buildings see <http://www.footballtraininggrounds.com/arsenal.html>

There has recently been an application (Hertsmere Council 14/1648) to build a new building next to the indoor pitch building.

The statement accompanying the planning application contains the following:

“When the training centre was first opened in 1999 the centre was considered one of the best in Europe. Today whilst additional improvements have been made to the medical rehabilitation areas improving the response of players to long term injury, other areas have fallen behind in football development terms. In particular facilities for strength and conditioning and analytical research have fallen behind top European and Premier League Clubs. The facilities and equipment planned for this new building are now considered essential by all the top clubs to assist in preparing and developing footballing talent. They are now deemed essential facilities by footballs governing body and medical professionals and all of the facilities proposed have been incorporated at St George’s Park, the National Football Centre and at Loughborough University where national sporting bodies have training bases using these facilities. Arsenal’s direct competitors have, or are in the process of providing, these facilities at their training bases within the UK and Europe.”

The Design and Access statement accompanying that planning application noted:

“The building grouping [which includes the covered pitch] do not detract from the general openness of the landscape in and around the training centre. Views into the site are non-existent from public accessible viewpoints, footpaths and the bridleway to the eastern boundary that also dissects Arsenal’s land holding. This is due to the extensive nature of the dense landscape planting along the training ground boundaries and the extensive woodland created on the northern section of the site where some 20,000 trees have been planted.”

From the proposed elevation document https://www6.hertsmere.gov.uk/online-applications/files/68D1619C0A4EED3B1B5C383F902251E5/pdf/14_1648_FUL-PROPOSED_PPC_ELEVATIONS-283067.pdf it would appear **that the height of the existing indoor pitch building is less than 10m.**

Chelsea (Category 1 Academy)

The training facility in Cobham (KT11 3PT) was opened in 2007 and comes under Elmridge local council and is in the Green Belt.

An application was made in 2012 for a new indoor pitch structure to replace the existing temporary dome.

The height of the structure is 10.9m, the indoor pitch measures 70m x 50 m and the structure is 80m x 60m.

The Chelsea training ground is 54 ha and the structure occupies about 1% of the site.

There have been subsequent applications to extend the building for other Academy purposes.

From the Design and Access Statement that accompanied the 2012 planning application the indoor pitch structure was a similar height to existing buildings and was not visible from outside the training facility.

Tottenham Hotspur (Category 1 Academy)

Tottenham Hotspur applied in summer 2008 for planning permission (ref 07/1623) to develop their training facility at Hotspur Way, Enfield. This is a 31 ha site with 15 grass pitches. It is 3 times the size of the CP site.

Planning permission was given in April 2008.

The planning documents are available on the Enfield Council site at <https://planningandbuildingcontrol.enfield.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=ZZZZL4JNXE239>

The documents are not clearly identified but we have found the Design Statement.

The indoor training facility is sunk into the ground (3 metres) so that its height is the same as the surrounding buildings which are pretty large. This is said in the Design Statement to “reduce the scale and potential skyline impact”.

One of the drawings shows the maximum height of the dome above the indoor pitch as 10.7m above ground level.

From the Design Statement the basement, incorporating the pitch, covers an area of 4,840 sqm

From one of the drawings the indoor pitch is shown as 70m x 50m.

Because it is a large site with mature screening already on the site the impact of the new buildings is said to be slight.

There was a section 106 agreement with the Council and the Club was said to be investing £2.3m over 10 years into community work including “education, mentoring, coaching and care support”.

Two other South London Clubs

Charlton Athletic (Category 2 Academy)

Charlton Athletic are a Category 2 Academy and have their Academy site at Eltham.

The latest planning application was in 2015 and the documents are on the Greenwich Council planning website at https://planning.royalgreenwich.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=_GRNW_DCAPR_80977

The dimensions of the building enclosing the pitch are stated in the planning document as follows:

“The indoor pitch is a building of 64m by 43m plus storage (2,876 sqm.) which encloses a pitch of 55m by 37m (60 yards by 40 yards) with the appropriate surrounds. The size of indoor pitch is the minimum necessary to meet EPPP Category 1 requirements. The building will be 12m high to ridge and approximately 8m to eaves level.”

West Ham (Category 1 Academy)

The West Ham website states:

“West Ham United have three training bases - Chadwell Heath, Rush Green and Little Heath.

Rush Green is home to the first-team squad, while Chadwell Heath plays host to the Development Squad, U18s and Ladies.

Little Heath plays host to the U18s and U16s' home matches, while its outdoor pitches are used for training by the Academy.”

The indoor pitch is at Chadwell Heath and was built more than 40 years ago, in 1978. We have been unable to obtain information on the internet of the height of the structure over the pitch.

West Ham is currently undertaking a £4m upgrade of its facilities at Chadwell Heath but it would appear that the main buildings are to be retained much as they currently are. See <https://www.whufc.com/news/articles/2018/september/08-september/chadwell-heath-academy-training-facility-undergo> for a general announcement.

We have no reason to believe that the “new” West Ham indoor structure will be of different dimensions to the 1978 building and will be nearer to 10m than the 19m proposed by CPFC.

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Appendix 3 – What is currently missing from the planning application

- A copy of the latest version of the Premier League's Elite Player Performance Plan (EPPP). We found a copy of the 2019/20 version as a click-through on the EFL website at <https://www.efl.com/-more/efl-youth-development/> We note that Charlton Athletic included a copy of the then current EPPP with their planning application for an indoor training pitch building.
- CGIs (Computer Generated Images) of the proposed Indoor Training Pitch Building viewed from Copers Cope Road, from the Pavilion and Gallery House flats and from appropriate parts of the Kent County Cricket ground to be determined by The Council;
- Details, to be provided by CPFC, of the structures with indoor pitches for which other London Premier League football clubs have gained permission with analysis to justify why CPFC need a much taller and more massive structure than those other clubs.
- A proper assessment of the planning harm that will be caused by *all* of the new structures proposed on the Academy Ground MOL.
- A full justification of positioning of the Indoor Training Pitch Building on the site. In our view the current, proposed, location is not necessarily the optimum one. Full consideration should be given to the location shown the Design and Access Statement (page 19) as "Refurbished Building - Option B
- Given that the proposed roofing material for the building is polycarbonate it is important to know whether it will be translucent and the building will require air conditioning and if so then the details of the proposed plant and noise attenuation measures should also be provided.
- If a translucent roof is proposed then it will also be necessary to submit an assessment of the light pollution which might arise from the evening use of the building.
- *Full* disclosure and clarification of the numbers of Academy Members and staff who will be using the ground and when that use will take place to enable a proper assessment of car parking provision. Residents understood from the club's presentation on 31 October that Academy use at weekends would cease at 2pm. We also understand from the EPPP rules that use of the 3G Pitch and Indoor Training Pitch is restricted to use by the Academy. However, Centro's Planning Statement states that it is intended to extend use to the Community into the evenings 7 days a week and we now understand from the club the intention is to generate an income stream from this use. Detail of use by the Community is also necessary to determine parking needs for that operation.
- Elevational plans for the proposed spectator seating to the Show Pitch, which according to the Proposed Ground Site Plan covers a total area of some 400 square metres.
- A plan detailing the number of spectator seats and their arrangement.
- A detailed justification of need for such a large area of seating with an assessment of the frequency and degree of use of the seating and its expected impact on car parking provision.
- A full tree survey of the CPFC site

- A detailed proposal which explains exactly what functions the pumping station is to fulfil, why it is necessary to situate the pumping station at the eastern end of the Grounds Maintenance Complex in the nearest possible location to the houses in Copers Cope Road, sets out exactly what plant is to be installed in the station, the sound levels which that plant will generate and its hours of operation with full details of the noise attenuation measures which will be incorporated to eliminate any noise pollution.
- An impact assessment study of the Grounds Maintenance Complex, including its three tanks and pumping station, on the adjoining MOL woodlands to the south which are under a TPO
- Full plans and details of the construction of the proposed attenuation tanks, how they will be supplied with water and how water is to be moved around the site for irrigation purposes.
- An assessment report to establish the frequency of use of the current access track between numbers 117 and 119 Copers Cope Road (proposed to be upgraded to a metalled road to access the Grounds Maintenance Complex, an impact assessment report to identify the nature and size of the vehicles to use it and to demonstrate the effect on the amenity of those two neighbouring properties and also a Transport Consultant's or Highway Engineer's report addressing the road safety issues surrounding the access being used for that purpose, its junction with the Copers Cope Road and the access road to CPFC's Training Ground on the east side of Copers Cope Road.

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Appendix 4 – Noise and the CPFC Noise Impact Assessment

A detailed note prepared and circulated to residents, 119 to 141 Copers Cope Road, most affected by the potential noise when the site has been developed

You will doubtless be aware of the planning application submitted by Crystal Palace Football Club for the creation of a Category 1 football academy at the end of your garden. The planning application includes a '**Noise Impact Assessment**' [NIA] which concludes at Section 6 on page 42 as follows:-

'The study has shown that the noise impact of changes....and at the worst affected properties to be negligible'

The worst affected properties are Numbers 119 to 141 to Copers Cope Road and therefore include your own. However, the data provided is misleading and must be challenged.

Page 33 of the NIA includes the following statement:-

'The exceptions are the dwellings adjacent to the far Southwest corner of the proposed development site, represented by receptor 131 Copers Cope Road, where noise levels during football training will increase in the region of 2.7dB respectively; however under the IEMA Guidelines, this might be considered a negligible impact at 131 Copers Cope Road. The greatest impact occurs in this area as unlike the rest of the site, there currently aren't any pitches adjacent to these properties. It should be noted that that whilst the impact is considered 'negligible' it is unlikely to be noticeable'

This paragraph is wrong and entirely misleading for the following reasons. [also the receptor at 131 Copers Cope Road is a theoretically modelled reading not an actual measurement]

The increase of 2.7dB has been miscalculated. It has been arrived at by deducting an 'existing' level of 43.6 from a figure of 46.3 for 'Even Distribution Across All Pitches ' [see table 5.3 on page 35 of the NIA]. It is wrong to use the 'Even Distribution' figure. The comparison should be made against the figure of 50.6 for 'Western Pitches Only'. The true change is therefore 7 dB and not 2.7dB. This is significant because dB measurements are on a logarithmic scale so it puts the increase into a much higher Long Term Impact Magnitude category. Instead of **Negligible** the correct category is **Moderate** [see Table 3.4 on p 20 of the NIA].

In fact the situation will be much worse than this because the maximum noise levels next to a football pitch are much higher. See para 4.4 at page 25 of the NIA where it is stated:-

‘The noise measurements show that at 9 m from the edge of the field, football noise was 53.8 with max noise levels at 84.9’

Since the edge of the pitch is shown only about 5 metres from the garden boundary the readings would be even higher than for 9 metres.

What this all clearly demonstrates is the fairly obvious situation that the noise disturbance from football training is going to have a very significant effect on the properties at 119 to 141 Copers Road and not the ‘negligible...unlikely to be noticeable’ effect claimed in the NIA.

Another area of concern to these properties will be possible noise disturbance from the pumping equipment to be located next to the new groundsmans store. At para 5.2 of the NIA it is stated that :-

‘ the noise output of specific items of plant have yet to be determined; therefore it is impossible to provide a full and detailed assessment of the likely impact of plant noise.’

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Appendix 5 – Conditions that could be applied when Bromley Council approves a planning application for this MOL site

This is a preliminary list of proposed conditions prepared to accompany the 20 December 2019 NCCRAG letter outlining objections to the planning application of November 2019. The letter asks Bromley Council to reject the current application and discuss suitable amendments so that a revised application can be submitted and approved.

Blackheath & Bromley Harriers AC made a planning application (18/01660/FULL1) in early 2018 to build a sports and community building on the side of the newly laid Norman Park Athletic Track in Hayes, Kent and permission was given at a meeting of the Bromley Council Development Control Committee on 26 November 2019. There was very considerable discussion with Bromley Council about all aspects of the proposals during that period and the conditions that were imposed reflect the detailed nature of that discussion.

We have reproduced what we consider to be relevant conditions imposed on Blackheath & Bromley Harriers AC which we think merit consideration in relation to the current application.

NCCRAG will review the conditions set out in this Appendix and submit an updated version in 2020 in advance of any Bromley planning committee meeting.

In the event that Bromley Council recommend consent and/or Members are minded to grant consent to the application then we ask for the following conditions to be applied to any consent granted:-

1. That all existing temporary buildings and water tanks on the site should be removed prior to the commencement of construction works on any Indoor Pitch Building, the Grounds Maintenance Complex and the Show Pitch spectator stands / seating.
2. That indoor training building, Show Pitch spectator stands / seating, the pump house and water tanks should all be demolished and all demolition debris removed from the site before CPFC vacate the site should that ever occur. Reason to prevent continuing damage to the openness of the MOL once need for and use of the various buildings ceases.
3. A working day and hours condition governing days and hours of all areas of construction work and other works relating to any consent granted. In particular that there should be no Sunday working and that work should not commence before 8am on any of the other days of the week or continue beyond 6pm on weekdays or 1pm on Saturdays.
4. Wheel washing condition to minimise the road safety risk of mud and soil on the highway.
5. The days and hours of use of a) the Indoor Training Pitch Building and b) the 3G All Weather Pitch should be restricted as follows:- Monday to Friday 8am to 10pm and Saturday and Sunday 10am to 6pm.

6. The flood lighting system for the 3G All Weather Pitch to include a proper switching system to prevent it coming on when the pitch is not in use and an automatic timer control to ensure that it switches off at the appointed time on each day of the week. Reason to minimise light pollution and be eco-friendly.
7. A suitable condition restricting the use of the flood lights to times when the 3G All Weather Pitch is being used There also need to be suitable conditions re the lighting of the indoor pitch and its hours of use. Reason to prevent the wastage of electricity (as has happened at other local grounds) by the lighting coming every day whether or not pitches are in use. Reason to minimise light pollution and use of electricity.
8. The height and type of floodlights, their wattage and diffusers to be agreed by the LPA before work is commenced on the construction of the 3G pitch. Reason to minimise and limit light pollution to the greatest extent possible and reasonable.
9. The applicant should be required to produce and submit to the Council, for its approval and agreement, an appropriate construction management plan before any works consented to are commenced. The NCCRAG to be consulted on the plan. Reason to mitigate any negative impact upon residents as a result of noise, dust and large vehicle movements which could impact the living conditions, health and amenity enjoyed by residents.
10. In relation to the "Grounds Maintenance Complex" the hours of use of the maintenance access route to exclude Sunday working and that maintenance vehicle movements be restricted to 8am to 5pm on weekdays and 9am to 1pm on Saturdays.
11. No personal staff or visitor vehicles to be allowed to use the maintenance access route and no staff or visitor car parking to be permitted at the maintenance complex.
12. The operation of any pumping stations or equipment on the site to be subject to strict noise limitations and strictly controlled to morning use only after 8am on weekdays and 9am at weekends.
13. We ask the Council to apply any other conditions it thinks necessary and appropriate for this kind of development to protect the interests of the residents, the neighbourhood and environment during the course of construction and development of the site and the subsequent operation of the academy over time.

The conditions imposed in relation to the Blackheath & Bromley Harriers AC planning application at the Development Control Committee meeting on 26 November 2019 which appear most relevant to the current application:

3. Prior to the commencement of the development, a community use statement prepared in consultation with Sport England and a completed lease agreement prepared with the Council's Regeneration division shall be submitted to and approved in writing by the Local Planning Authority. The community statement shall describe and outline how the facilities would be accessible to the members of the public and include details of pricing policy, hours of use, management responsibilities and a mechanism for review. The development shall not be used otherwise than in strict compliance with the approved statement and agreement.

Reason: To ensure adequate public accessibility of the sports facilities for the residents and location communities and compliance with London Plan Policy 3.16 and Bromley Local Plan Policies 20 and 21.

4 Prior to the first use of the site, an Events Management Coordination Framework shall be submitted to and approved by the Local Planning Authority in consultation with the Council's Transport, Licencing, Public Open Park Services. This shall detail the proposed arrangements and coordination of major activities with Bromley Football Club and Hayes Street Farm including traffic mitigation generated associated to the site, in particular, the management of visitors visiting the site and

Norman Park using private vehicles when multiple events are taking place in the locality. An Event Management Coordination Manager shall be appointed prior to the opening of the building and shall manage, monitor, and review the Framework and its operation in cooperation with the Local Planning Authority and relevant stakeholders.

Reason: To protect the amenities of local residents and users and to effectively coordinate the multiple activities and events in the locality and compliance with London Plan 6.3 and 7.15, Bromley Local Plan Policies 31, 37 and 119.

6 Prior to occupation of the new facilities, a Travel Plan setting out how the site shall be managed and how operator will encourage the use of sustainable modes of transport shall be submitted to and approved by the Local Planning Authority. The Plan shall be implemented in accordance with the approved details and timescales.

Reason: In order to safeguard residential amenity and the safety of pedestrians and users of vehicles and ensure compliance with Bromley Local Plan Policies 21 and 31.

9 Prior to first occupation of the building, a Servicing and Delivery plan shall be submitted to and approved by the Local Planning Authority. The plan shall be implemented in accordance with the approved details and timescales.

Reasons: In order to ensure and acceptable adequate access arrangement can be provided and maintained.

10 The noise from any plant or equipment such as air handling units, air conditioning, lifts, mechanical ventilation etc which forms part of the development shall not cause the existing noise level to increase when measured at one metre from the façade of the nearest noise sensitive premises. In order to achieve this, plant should be designed/selected, or the noise from the plant attenuated, so that it is 10dB below the existing background level.

Reason: To safeguard the amenities of neighbouring properties and the area generally and ensure compliance with Bromley Local Plan Policies 37 and 119.

11: The use hereby approved shall operate between the hours of 8am to 9pm Monday to Friday, and 8am to 6pm Saturdays and Sundays. On a maximum of 6 occasions per calendar year, the use shall operate up to 12.00am midnight, subject to written notice having been served on the Local Planning Authority no later than 28 days prior to the event.

Reason: To safeguard the amenities of neighbouring properties and the area generally and ensure compliance with Bromley Local Plan Policies 37 and 119.

13 No development at the site shall begin until a surface water drainage scheme based on sustainable drainage principles and an assessment of the hydrological and hydro geological context of the development, has been submitted to and approved in writing by the Local Planning Authority. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed. The scheme shall include details of how the scheme will be maintained and managed after completion and calculations to demonstrate the adequacy of the soakaways.

Reason: To prevent the increased risk of flooding, to improve and protect water quality, improve habitat and amenity, and ensure future maintenance of the surface water drainage system and comply with Bromley Local Plan Policies 115 and 116.

19 Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any Order amending, revoking and re-enacting this Order) the building hereby permitted shall only be used for purposes within Class D2 of the Schedule to the Town and Country Planning (Use Classes) Order 1987 and for no other purpose.

Reason: For the avoidance of doubt and compliance with the submitted details.

20: Prior to commencement of development, details of replacement trees of sufficient quality and quantities shall be submitted to and approved by the Local Planning Authority in writing. Replacement trees shall be of local provenance where possible. The scheme as approved shall be carried out in the first planting season following the completion of each development phase. Any trees, shrubs or plants that die within a period of five years from the completion of each development phase, or are removed and/or become seriously damaged or diseased in that period, shall be replaced (and if necessary continue to be replaced) in the first available planting season with others of similar size and species, unless the Local Planning Authority gives prior written permission for any variation.

Reasons: To maintain the biodiversity value of the site and compliance with London Plan Policies 7.19 and Bromley Local Plan Policies 73 and 79.

You are further informed that :

- 1 A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality."
- 2 Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
- 3 The applicant is advice to contact Mark Headley (Mark.A.P.Headley@met.police.uk) Designing Out Crime Officer from Metropolitan Polices Service prior to any formal application to discharge planning condition.
- 4 The applicant are advice to read and follow the Council's Control of pollution and noise from demolition and construction site - Code of practise guidance before preparing any formal submission. The guidance is available on the Council Website and attach the link for information. https://www.bromley.gov.uk/info/412/pollution_control_-_noise/564/construction_or_demolition_noise

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Appendix 6 - Further considerations – planning and other

Car Parking

There is a very significant reduction in parking provision (the club alleges around a third) and the planning application contains no serious evaluation of the future levels of use of the MOL site and the potential vehicle movements which it will generate. There is also a change to the existing vehicle access and egress schemes. In addition the application proposes a coach drop off and pick up area on the site adjacent to the Gambado building and Copers Cope Road which seems to be in the location where there is an existing electricity sub-station on site. The application incorrectly quotes the current number of vehicle accesses as four.

There are in fact only at most three currently approved accesses:-

1. That serving as the current vehicular access between numbers 153 to 155 Copers Cope Road.
2. That serving as the current vehicular egress between the Gambado building and 169 Copers Cope Road
3. The maintenance access opposite the CPFC Training Ground access road. This has now been unused for very many years (probably 20 years now) since long before the hard tennis courts stopped being maintained by the previous owner. While it has recently been cleared of undergrowth by CPFC it is not a serviceable access currently as it remains punctuated by old tree stumps etc.

The fourth access referred to, although not specifically identified, is presumably the hole knocked in the boundary wall adjacent to the Copers Cope Road end of the Gambado building.

That so-called access was created by Goals (without permission) solely for the purposes of the construction of the Goals five a side pitches in 2007 or thereabouts.

Bromley Council subsequently approved that the opening could be used as access to an overflow car park which would have added an additional 61 parking spaces (in fact the plan shows 68 additional spaces) as part of an application under reference DC/08/00147. The car parking element of the permission was never exercised but it would have been sited along the length of the Goals five a side pitches, between the pitches and the boundary wall to Copers Cope Road.

This could again provide an excellent location for additional parking now!

The Elite Player Programme Plan (EPPP) has indicated that its ambition is to lower the academy starting age from Under 9's to Under 5's. CPFC may want to do this. If they did it could add as many as 88 boys to the 220 existing number of trainees expected to use the site bringing the total to 308. The introduction of these younger boys and the relative inaccessibility of the site, located in a 1b to 2 PTAL score area will increase the demand for parking as youngsters of that age would almost certainly be transported to and from the site by car.

There is a discrepancy between the number of boys who it is proposed are to be trained at the ground, 220 as presented to residents at the end of October / beginning of November, and the numbers which are stated in the ECF Statement of Community Involvement which says “more than 200 players” while according to statements in the 747 page documentation Academy use is limited to only 178 boys.

There needs to be a much clearer picture of the intended use and this could be informed by a proper disclosure of the complete training programme envisaged and proposed.

Other new buildings: maintenance buildings, water (attenuation) tanks and pumping station, the “Grounds Maintenance Complex” and spectator seating.

The proposed indoor pitch is not the only new building. In their planning statement, CPFC’s planning consultants mention “the installation of maintenance/store sheds, water tank”.

These are substantial buildings in their own right and yet their impact on the site is not addressed.

Worryingly, the outline designs are even described as ‘indicative’.

It is worth noting that, at CPFC’s exhibition of the new proposals, their scale model and drawings did not include these major new buildings and attendees were informed that the area would simply be a turning place for maintenance vehicles. Since a number of respondents to the consultation will have based their comments on the exhibition, the omission of these buildings was misleading at best.

This is going to be a major civil engineering exercise and there would appear to be no clear plan as to what is going to be involved and what works are going to be necessary. In particular, there is no detail given as to the plant and equipment involved and its capacity and capability nor, therefore, can any firm idea be given as to the potential for noise pollution nor what noise attenuation might be appropriate.

The buildings cover an area approximately 65m x 12m and are 6m in height but as the plans are currently shown as indicative CPFC might decide that they need even larger buildings. There is currently no proposal for screening or attenuation of the impact.

Locating the pumping station and its equipment so close to the neighbouring residential properties seems certain to adversely affect their residential amenity.. There is also no clear indication as to what the proposed new buildings will look like nor what level of noise will result, what time periods they will be in use for, nor their impact on the adjacent properties which are very close. A CGI of the buildings is necessary.

They represent a significant encroachment on MOL and should be rejected so that alternative options can be developed that ensure the harm to the neighbouring properties can be eliminated altogether or minimised to a level which is reasonable and meets the legitimate expectations of residents. This might need to include reordering the layout.

If the unmade maintenance access track is to be brought back into use there must be a clear understanding beforehand of its proposed uses and due consideration to the road safety risks as the access / egress is on a bend in a stretch of Copers Cope Road where many vehicles travel at excessive speed. Residents may need the Council to condition the use of this access including its operating hours to protect the amenity of the neighbouring homes.

Existing building

There is already at least one water tank on site (visible from Worsley Bridge Road) in the temporary building complex (retrospective application DC/16/01312 not yet determined it seems) adjacent to the old gym and Goals pitches. Permission for this building was requested for 3 years.

The Council has not determined the application but no action has been taken to get the building removed which suggests that Bromley Council has accepted that there is a need for such a building to facilitate pitch watering.

Interestingly the complex includes a small pump house and the planning statement states that the tank is for the supply of water for showers for the boys. The tank is 9.358m in diameter and 2.48m high. A tank of such a size can surely only have the purpose of irrigating the pitches and not supplying water for showering!

The position needs to be investigated by Bromley Council before any planning application can go to Committee.

Show pitch and stand

There are no plans for the two spectator stands to the show pitch.

Measurements based on the ground site plan indicate they would each be 50m x 4m. A total area of 400 sqm. Desk top research on-line indicates that to watch a football match 5 spectators need 1 sqm. This means the proposed stands could accommodate 2,000 people. At the exhibition at the end of October Steve Parish, CPFC Chair, played down the stands and their use in his presentation and suggested that if a large number of people wanted to attend a match it would be relocated to Selhurst Park. In the CGI's they are variously shown with shelters and as berms. The stands are referenced in the application title as "spectator seating".

The situation needs to be clarified by Bromley Council.

Floodlighting of the new artificial 3G pitch

This is currently right on the edge of Copers Cope Road and will be clearly visible from the Kent Country Cricket site, from Pavilion House and Gallery House and, most significantly, from Bank Cottage on the corner of Copers Cope Road and Worsley Bridge Road.

It needs to be clear what impact the floodlighting will have and there need to be conditions imposed on the hours during which it can be used. The hours of use need to be conditioned if the Council is minded to grant permission. There also needs to be clarity on a number of other matters. These include the exact nature of the lighting and what steps will be taken to minimise light pollution by way of controlling the height of the lamp standards, the lamp or bulb types used and inclusion of appropriate diffusing lenses.

Noise

We have particular concerns about the impact of the development on the properties in the Area of Special Residential Character, numbers 119 to 141, whose gardens are directly adjacent to one of the new pitches. It is proposed that this new pitch will be located 5m from their properties which are also very close to the proposed Grounds Maintenance Complex and, in particular, its pumping station and plant.

CPFC has submitted a Noise Impact Assessment which in section 6 on page 42 states “the study has shown that the noise impact of changes ...and at the worst affected properties to be negligible.” We have reproduced at Appendix 4 the detailed analysis prepared by one of our Committee members which demonstrates that this is not an accurate analysis of the current and the, potential, future situation. It is clear that the impact could be very significant.

The potential impact of the irrigation and attenuation system is currently not known and more details need to be given by CPFC before this aspect of the application can be properly assessed. Paragraph 5.2 of the Noise Impact Assessment states “the noise output of specific items of plant have yet to be determined; therefore it is impossible to provide a full and detailed assessment of the likely impact of plant noise.” This is clearly not an acceptable position for residents.

How water is dealt with on a site which is on a flood plain is clearly a key element of the proposal and there needs to be a proper assessment of this element of the proposal before it can be assessed by Bromley Council. CPFC are taking a ‘hard engineering’ approach to flood risk management, rather than seeking a more modern, natural and ecological solution. A key concern is the effect of the proposed irrigation system on the adjoining woodland to the south which has a Tree Preservation Order and this should be covered in any impact assessment.

Residents are also concerned that there is no evidence as to whether Thames Water have been consulted about these proposals or, if that has happened, what Thames Water’s response has been and whether any licensing is required.

We assume that the three tanks proposed to be incorporated in the Grounds Maintenance Complex will be supplied by mains water as happens currently with the existing tank adjacent to the temporary changing room facilities on site. Given the volume these tanks would hold filling them might have to take place overnight to prevent disrupting the domestic supply to residential properties in Copers Cope Road. We are concerned that this might have noise pollution ramifications also.

Light pollution

The roof to the indoor pitch building is of polycarbonate material and we believe will be translucent. If that is the case, and evening use is permitted in accordance with the application documents, then there is a serious risk that the building will create light pollution. Further details need to be submitted by CPFC to establish whether or not there is going to be a problem in order for Bromley Council to assess the seriousness of that problem.

We have covered the problem of light pollution from the all weather pitch in our comments above.

Pitch locations

The location of the pitch at the bottom of the gardens of 119 to 141 should be reassessed in the light of the above comments on noise and the knock on effect of the proposed reduction in the size of the indoor pitch building.

CPFC intend to locate the new pitch behind 119 to 141 very close to the rear of these properties and propose installing high ‘ball stop’ nets. These represent a visual intrusion in sight lines over the MOL land.

This new pitch could be moved further away from the bottom of the gardens particularly if there is a reduction in the size of the indoor pitch building and modifications to the proposals

for the Grounds Maintenance Complex. This might also obviate the need for ball stop nets altogether.

Trees and ecology.

One of the submitted documents is a Preliminary Ecological Appraisal and Preliminary Roost Assessment Report which needs further elaboration. We suggest that the emphasis should be on enhancing and reinstating key features of the local environment in order to establish and enhance the ecological habitat.

1. There should be a full tree survey. We believe the ecologist is likely to already have most of the info required.
2. There should be no more tree felling until the survey has been completed and submitted to Bromley Council. A number of trees have already been felled towards the TPO woodland on the southern boundary.
3. Depending on the Council assessment, TPOs should be issued for selected trees along the entire perimeter of the site. Trees and other vegetation on neighbouring residential boundaries should not be removed without prior and explicit agreement from each individual property owner.
4. There should be a condition that any other trees removed for site construction purposes be replaced and the value of other habitats such as scrub, grassland and hedging are recognised and included for replacement or restoration.
5. There needs to be an agreement as to the extent and type of tree screening to be planted around the proposed covered pitch and any other new buildings if they are deemed appropriate on the MOL.

We consider that CPFC's approach to ecology and sustainability has been disappointingly unambitious in the light of the universal recognition of the importance of mitigating climate change and its impacts.

It is striking that Tottenham Hotspur's approach to the development of their Academy site placed an impressive emphasis on ecological and environmental issues. Their redevelopment included significant *additional* tree planting and included measures to introduce natural wetlands as part of their approach to flood mitigation.

We are disappointed that CPFC's planning consultants have demonstrated more interest in citing precedents for approval of developments on MOL rather than learning from good practice by other football clubs with which CPFC competes.

Visual imagery – the CPFC Eagle

CPFC is proposing that its emblem, the Eagle, should be emblazoned on the roof of the Indoor Pitch Building and on both ends of that building.

The façade of the building facing Copers Cope Road is going to be visually intrusive.

If it is used by CPFC as an advertising billboard that billboard will be 266ft long and 62ft high: we believe it would be overpowering. We do not believe that even the most ardent CPFC fan would consider it appropriate in the middle of a residential area.

The actual residents do not want to see an Eagle of that size and we suggest that Bromley Council refuse permission for any such emblem on the Copers Cope Road end of the proposed building.

We also consider that its, potential, appearance on the roof of the Building should be carefully considered.

Conditions

We have set out, in Appendix 5, some suggested conditions that Bromley Council can consider when they are minded to approve a planning application to develop this site.

We will review these conditions early in the New Year so that we can provide a more definitive list. In the time available, and as we have asked for the current application to be rejected, we have concentrated on what we consider to be the main challenges posed by the current application.