

# PLANNING STATEMENT

In respect of

**Visitor Centre**

At

**Eltham Palace, Court Yard, Eltham, SE9 5QE**

On behalf of

**ENGLISH HERITAGE**

JCG25358  
Planning Statement  
1.0  
January 2021

## REPORT

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Prepared by:

Prepared for:

**RPS**

**English Heritage**

Simon Chapman  
Director

20 Farringdon Street  
London, EC4A 4AB

**T** +44 20 3691 0500  
**E** [simon.chapman@rpsgroup.com](mailto:simon.chapman@rpsgroup.com)

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# 1 INTRODUCTION

- 1.1 This planning application has been prepared on behalf of English Heritage in support of the following development:
- “Replacement of the existing entrance steps to the visitor centre, with a ramp, together with alterations to the raised planter and provision of bench seating.”*
- 1.2 The planning application comprises of the following:
- Application Form
  - Planning Statement (this document)
  - Archaeology Desk Based Assessment (prepared by RPS)
  - Drawings:
    - Site Location Plan (Drg No. A1807-EPR-L-DR- 001 Rev. PL0)
    - Block Plan (A1807-EPR-L-DR- 002 Rev. PL0)
    - Existing Site Plan (A1807-EPR-L-DR- 101 Rev. PL0)
    - Proposed General Arrangement (Drg No. A1807-EPR-L-DR- 201 Rev. PL0)
    - Proposed Sections (Drg No. A1807-EPR-L-DR- 401 Rev. PL0)
    - Existing & Proposed Elevations (Drg No. A1807-EPR-L-DR- 402 Rev. PL0)
    - Materials Palette (Drg No. A1807-EPR-L-DR- 501 Rev. PL0)
- 1.3 The planning application fee for the replacement ramp is £234 (plus £25 Planning Portal administration fee); this will be paid via the Planning Portal (ref: PP-09369665).
- 1.4 The purpose of this Planning Statement is to set out the details of the scheme and to address the relevant national, regional and local planning policies, as well as other material considerations.
- 1.5 The structure of this statement is as follows:
- Section 2 provides a background to English Heritage, Eltham Palace and the proposal;
  - Section 3 details the relevant planning history;
  - Section 4 provides a review of the pre-application submission;
  - Section 5 includes details of the proposals;
  - Section 6 contains a summary of relevant planning policy against which the proposal will be considered;
  - Section 7 provides a planning assessment of the proposals, and;
  - Section 8 sets out the overall conclusions.

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## 2 BACKGROUND

### English Heritage

- 2.1 English Heritage (EH) are a registered charity that cares for over 400 historic buildings, monuments and sites - from world-famous prehistoric sites to grand medieval castles, from Roman forts to a Cold War bunker; bringing the story of England to life for over 10 million people each year. EH protects an internationally important collection of historic sites and artefacts which span six millennia, from the ancient past to the present day and include palaces, houses, hill figures, castles, abbeys, industrial sites, Roman forts and even deserted medieval villages.
- 2.2 The priorities of EH is to create inspiring visitor experiences that bring the story of England to life. EH will also make sure their historic sites and artefacts are expertly cared for, so that they can be enjoyed by future generations. EH is finding new ways to involve more people in their work and their target is to ensure they are financially independent by 2022/23. This means EH will need to generate sufficient income to fulfil their charitable purposes over the long term, without government support.
- 2.3 One of the EH objectives is to significantly improve their offer across the board, to attract more visitors by investing in visitor experience, to improve their welcome for families and overseas visitors, and to grow their catering offer through space expansion and other improvements to increase income from retail.

### Eltham Palace

- 2.4 Eltham Palace is one of the few medieval royal houses in England to survive, with substantial remains intact. The architectural status of Eltham is clear from the size of the great hall built for Edward IV in the 1470s; at 30.8 metres long by 10.9 metres wide, it is the largest surviving pre-Tudor aisleless great hall in the country, with the exception of Westminster Hall.
- 2.5 Eltham Palace has a unique combination of two features that would each be highly significant in their own right. Firstly, it combines one of the largest and best-preserved medieval great halls in England, created in an unusually well-favoured royal manor, and a luxurious and idiosyncratic Art Deco house and garden of the 1930s, reflecting the artistic and intellectual interests of its owners, Stephen and Virginia Courtaulds. During the mid-to-late 20<sup>th</sup> century, the site was occupied by the Royal Army Education Corps, with the Royal Parks using it as a training facility from 1975 -1993.
- 2.6 Secondly, in addition to the Palace, visitors can explore 19 acres of beautifully landscaped gardens including, the herbaceous border designed by award-winning garden designer Isabelle Van Groeningen. The Courtauld's were both keen gardeners and they enjoy time outside and socialising with their guests in the grounds of Eltham. The garden was designed for the owners to follow their horticultural interests and entertain their friends.
- 2.7 Eltham Palace is considered a site of national significance, as reflected by the numerous statutory heritage:
- Scheduled Ancient Monument;
  - Eltham Palace Great Hall – Grade I Listed;
  - North Bridge Across Eltham Palace Moat – Grade I Listed;
  - Eltham Palace (Eltham Court) - Grade II\* Listed; and,
  - Registered Park and Garden - Grade II\* Listed.

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## The Role of English Heritage at Eltham Palace

- 2.8 EH assumed management of Eltham Palace in 1995 and is responsible for the care, conservation and presentation to the public of the Palace and its grounds. EH provides all the maintenance and operational support to the Palace buildings, the café and the Palace grounds.
- 2.9 The site is opened to paying public and members of EH. Eltham Palace received circa.110,000 visitors in 2018 and circa 125,000 visitors in 2019. Eltham Palace is opened to the public on Sunday to Friday (6 days a week) between February to October, and on Sundays during the winter between November to February.
- 2.10 In 1999, EH completed a major programme of repairs and restoration of the 1930s interiors of the main house and gardens. In 2014-2015, a new family play area was opened, on the site of the Courtauld's former tennis courts, together with a new Visitor Centre at the existing glass houses which incorporate admissions, memberships, shops and a café. This removed all visitor facilities from the main house, which allowed for previously closed areas of the house to be opened to the public, with a theme of inviting visitors to go in as guests to one of the Courtauld's many parties. The southern car park was also upgraded and extended to provide additional parking facilities.
- 2.11 The 2014 / 2015 refurbishment project with a children's play area and a café was initially successful exceeding the planned visitors targets and proven popular with the local audience. However, in subsequent years' its performances have fallen short of planned target, with lower than expected visitor growth. The only exception was the growing revenue from the catering offer which proven the ongoing popularity of the café.
- 2.12 The current level of visitor facilities are not appropriate for Eltham Palace's position as one of the top 10 English Heritage site in London, as historically the main commercial focus at the site has been generating commercial revenue through hospitality and filming, with the venue being closed to the public on Saturdays for hospitality events, such as weddings.
- 2.13 As part of the estate management plan to attract more visitors, from 2020 onwards it is proposed to open the attraction every day between February to October, and at the weekends only during the winter months (November to February).

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## 3 SITE AND SURROUNDING AREA

### Eltham Palace

- 3.1 The Eltham Palace complex is located within Eltham and is 3.5km to the south-east of Greenwich and Blackheath. The Palace is surrounded by a moat, now partly dry, and approximately 9ha of gardens lie within and beyond the moat.
- 3.2 The site is bounded by King John's Walk to the west; by the back gardens of houses on Courtyard and Court Road to the north and east respectively; and open fields to the south. The location of the proposed development lies to the east of the main house separated by a substantial grass embankment.

### Visitor Centre

- 3.3 The Visitor Centre was approved in 2014 and involved the relocation of the principal visitor facilities, including admissions, retail and café areas from within the service wing of the main house to a more welcoming and accessible position in the gardens.
- 3.4 The Visitor Centre was converted from a group of existing buildings comprising, the Tennis Pavilion, the Gardeners' Bothy, the South Glasshouses, the Hardy House and the North Glasshouse. Access to the Visitor Centre was via a short flight of steps and ramp.



Exiting Entrance to Visitors Centre

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## 4 PLANNING HISTORY

- 4.1 The Royal Borough of Greenwich's online planning application records have been reviewed and the most recent consents have been detailed:
- 4.2 Planning permission (Ref: 18/4189/F), was approved on 12 April 2019 for the replacement of existing garden storage shed with a steel shed.
- 4.3 On 06 April 2016, a non-material amendment (Ref: 16/0830/NM) was approved to planning permission (Ref: 14/0486/F), for alterations to the east elevation of the glasshouse to replace the currently painted glass elevation with timber and zinc cladding to match the new visitor centre on the north side of the divide wall.
- 4.4 On 02 October 2014, a non-material amendment (Ref: 14/2521/NM) to planning permission (Ref: 14/0486/F), was approved for minor alterations, including omission of mono-pitch gable, installation of zinc cladding and modification of windows and door.
- 4.5 Planning permission (Ref: 14/0486/F) was approved on 09 May 2014 for the partial demolition of glass houses to facilitate the construction of a public visitor facility and extension of south car park to provide additional car parking space.
- 4.6 On 23 October 2013 a planning application (Ref: 13/2482) was submitted for an extension of south visitor car park to provide an additional 40 car parking spaces including alterations to existing entrance / exist to car park. The application was withdrawn on 02 December 2013.



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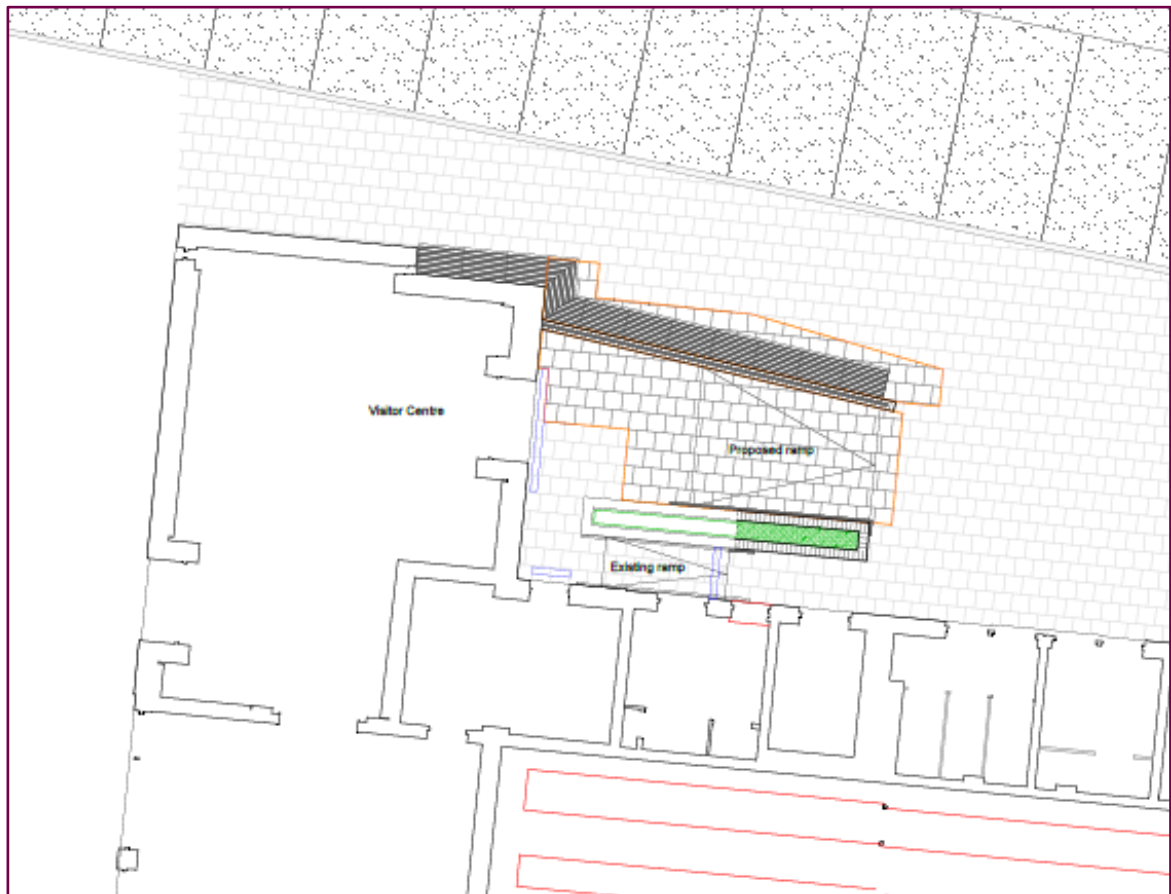
## 5 PRE-APPLICATION

- 5.1 On 18 October 2019 a pre-application request was made to the Royal Borough of Greenwich on behalf of English Heritage in respect of the following:
1. Creation of a “water and play” scheme comprising interventions in the landscape and associated structures, including kiosk and stand-alone plant room within an area of existing car park which will be reconfigured;
  2. Works to the existing Visitor Centre, including conversion of an existing storage building into a toilet block and replacement of an existing glasshouse with a new stores building;
  3. Provision of new parking area (182 parking spaces) within the existing easternmost paddock field located to the south of the Visitor Centre; and
  4. improvements to the existing path network to create better connections, accommodate increased visitor number and unlock lesser-used areas of the site.
- 5.2 The pre-application request was seeking RBG’s advice on the principle of the proposed development, and confirmation of the supporting information and technical reports that would be required to validate and determine any future formal planning submissions.
- 5.3 Additional information to support the pre-application request was submitted in March 2020. Due to the outbreak of the Coronavirus Pandemic, the pre-application meeting did not take place until 14 October 2020.
- 5.4 Unfortunately, at the time this application was submitted, the written pre-application response from the RBG has not been received.

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## 6 THE PROPOSAL

- 6.1 The current access to the Visitors Centre is not considered to be welcoming, with multiple entrance routes towards the main entrance door, which makes queueing confusing. As such, the proposals that are the subject of this application, seek to remove the existing steps and replace them with a new wide proposed ramp, which would clarify movement. The proposal also includes alterations to the raised planter and provision of seating for visitors.
- 6.2 The existing accessible ramp will be retained and will be separated from the new ramp by extending the existing raised planter.



Extract from Proposed General Arrangement Drawing

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## 7 PLANNING POLICY CONTEXT

- 7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise.

### Development Plan

- 7.2 The relevant development plans include:

- London Plan (2016)
- Royal Greenwich Core Strategy and Detailed Policies DPD (2014)

### London Plan (2016)

- 7.3 The relevant policies of the London Plan are:

- Policy 7.4 – Local Character
- Policy 7.8 – Heritage Assets and Archaeology

### Royal Borough of Greenwich Development Plan (2014)

- 7.4 On the RBG Proposals Map, Eltham Palace is subject to the following policy designations:

- Metropolitan Open Land
- Site of Nature Conservation Importance (Site NC11 – Eltham Palace Fields)
- Green Chain
- Eltham Palace Conservation Area
- Historic Landscape
- Area of Special Character

- 7.5 The Visitor Centre is not listed and outside the area of the Scheduled Ancient Monument.

### Local Plan Policies

- 7.6 The relevant local plan policies are:

- Policy DH1 – Design
- Policy DH3 – Heritage Assets
- Policy DH (h) – Conservation Areas
- Policy DH (i) – Statutory Listed Buildings
- Policy DH (l) – Areas of Special Character
- Policy DH (m) – Archaeology

### Other Material Considerations

- 7.7 The other material considerations include the following:

- National Planning Policy Framework (NPPF)
- Planning Practice Guidance (PPG)
- Supplementary Planning Documents
- Emerging London Plan

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## National Planning Policy Framework

- 7.8 The National Planning Policy Framework (NPPF) was published February 2019. This document sets out the Government's overarching planning policies for England and how these are expected to be applied.
- 7.9 Paragraph 7 states that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 sets out three dimensions to sustainable development: economic, social and environmental.
- 7.10 Paragraph 192 states that in determining applications, local planning authorities should take account of amongst other things the desirability of new development making a positive contribution to local character and distinctiveness.
- 7.11 Paragraph 196 advises where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

## Planning Practice Guidance

- 7.12 The Government has published further advice on the implementation of national planning policies and statutory regulations in the form of online Planning Practice Guidance (PPG).

## Supplementary Planning Guidance / Documents

- 7.13 The RBG has published the Eltham Palace Conservation Area Appraisal. This appraisal is used to help determine planning applications for external alterations and new development. They also form background documents informing the production of local plans.
- 7.14 Each character appraisal features the history and character of the conservation area and what makes it special. The management strategy recommends ways to preserve and enhance the area. This sometimes includes proposals for changes to the boundary, and buildings to be added to the local heritage list. The purpose is to:
- assess whether the existing planning controls are adequate to protect the character of the area, and if not, to recommend additional controls; and
  - encourage building repairs and alterations that are sympathetic to the style and character of the buildings in the area.

## Emerging London Plan

- 7.15 The GLA are currently progressing the new London Plan. The Publication London Plan (December 2020) is anticipated to be adopted in early 2021.
- 7.16 The relevant policies of the Publication London Plan are:
- Policy HC1 – Heritage Conservation and Growth

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## 8 PLANNING ASSESSMENT

- 8.1 In this section of the statement, consideration is given to the key issues raised by the proposal in relation to the planning policy context.
- 8.2 The site is located within the Metropolitan Open Land, and a Site of Nature Conservation Importance. Eltham Palace is a Scheduled Ancient Monument and contains a number of listed buildings and is located within the Eltham Palace Conservation Area. In light of the proposals that form the subject of this application, consideration will be given to the following:
- Heritage
  - Design

### Heritage

- 8.3 London Plan (LP) Policy 7.8 states that London's heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, Registered Battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.
- 8.4 Publication London Plan Policy HC1 states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.
- 8.5 RBG Policy DH3 states that The Royal Borough will protect and enhance the heritage assets and settings of Royal Greenwich, preserving or enhancing the character or appearance of the 20 Conservation Areas, applying a presumption in favour of the preservation of statutory listed buildings and their settings, giving substantial weight to protecting and conserving locally listed buildings, protecting the three registered parks and gardens, as well as Royal Greenwich's archaeological remains and areas of special character.
- 8.6 RBG Policy DH (h) advises that with regards to the character and setting of conservation areas within the borough, this policy states that *'planning permission will only be granted for proposals which pay special attention to preserving or enhancing the character or appearance of the Conservation Area'*. It also states that *'the local scale, the established pattern of development and landscape, building form and materials will all be taken into account'*.
- 8.7 RBG Policy DH (i) has regard to the protection of listed buildings, and states that there will be a presumption in favour of the preservation of listed buildings. It also advises that proposals for development which would detract from the setting and proportions of a listed building or group will be resisted.
- 8.8 RBG Policy DH (l) states that within Areas of Special Character, special consideration will be given to the safeguarding, restoration and enhancement of character, scale and quality of open spaces and associated buildings. Skylines and distant views both to and from the Areas of Special Character will be protected.
- 8.9 RBG Policy DH (m) advises that the Royal Borough will expect applicant's to properly assess and plan for the impact of proposed developments on archaeological remains where they fall within Areas of High Archaeological Potential (AHAPs).

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## Assessment

### (a) Built Heritage

- 8.10 In accordance with Section 189 of the NPPF, consideration has been given to the significance of the heritage assets, including any contribution made by their setting, and the likely impacts of these proposals on this significance.
- 8.11 The Eltham Palace Visitor Centre is housed in what used to be a complex of greenhouses that were built for Stephen and Virginia Courtauld in the 1930s. These greenhouses were designed by W. Richardson & Co and were used to cultivate the Courtauld's collection of orchids and exotic plants, for which the couple received awards from the Royal Horticultural Society.
- 8.12 The greenhouses were considerably damaged by bombardments during the Second World War. Following storm damage in the 1980s, the Royal Parks Department, which was occupying the Palace grounds at the time, replaced the greenhouses' superstructures with aluminium framing. Only some original brickwork footings were retained.
- 8.13 In 2014-2015, after English Heritage took over the management of Eltham Palace, the greenhouses were partly demolished, altered and refurbished to house the existing visitor centre and café (Ref: 14/0486/F). The existing arrangement of steps, ramp and planters at the entrance of the visitor centre was constructed at this time.
- 8.14 The visitor centre is not a listed building. However, it lies within the Eltham Palace Conservation Area, the Eltham Palace Registered Park and Garden (Grade II\*), and the setting of the Eltham Palace Scheduled Monument and listed buildings. The application site, in particular, only includes the landscaping arrangement at the entrance of the visitor centre. This landscaping is of no historic or architectural interest as it was installed in 2014-2015. As such, its alteration and construction of a larger ramp to improve accessibility, with materials to match the existing, is not considered to harm the significance of the conservation area, registered park and garden, scheduled monument and listed buildings at Eltham Palace.
- 8.15 The 2014-2015 development works to convert the greenhouses into a visitor centre did not require a Listed Building Consent. Moreover, the application site only includes a small area of landscaping within the registered park and garden and not the building structure of the visitor centre itself. As such, a Listed Building Consent for the works proposed is not considered necessary.
- 8.16 It is therefore considered that the proposals are entirely in keeping with all national and local legislation and policy relating to the historic environment and there are, as such, no heritage reasons why the proposals should not be supported.

### (b) Archaeology

- 8.17 The planning application submission is accompanied by an Archaeological Desk Based Assessment (ADBA), prepared by RPS.
- 8.18 The ADBA explains that the application site forms part of the wider Eltham Palace site, which has been assessed for its below ground archaeological potential. In accordance with relevant Government planning policy and guidance, a desk-based assessment has been undertaken to clarify the archaeological potential of the study area.
- 8.19 The assessment advises that no World Heritage Sites, Historic Battlefield or Historic Wreck sites have been identified within the vicinity of the study site. The bulk of Eltham Palace and associated grounds comprise a nationally significant designated Scheduled Monument.

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- 8.20 In terms of relevant local designations, the study site lies within an Area of High Archaeological Potential, as defined by the Royal Borough of Greenwich and their archaeological advisors at GLAAS. The available information indicates a modest archaeological potential within the area of proposed development for the later prehistoric, Medieval, Post Medieval and Modern periods. Past-post depositional impacts within the study site are considered likely to have had a negative archaeological impact. The proposals currently comprise the replacement of the existing entrance steps to the visitor centre, with a ramp, together with alterations to the raised planter and provision of bench seating.
- 8.21 The area of proposed development has previously been subject to archaeological monitoring during the creation of the existing visitors centre, and no archaeological remains of significance were identified. As such no further archaeological mitigation measures are therefore proposed in this particular instance.
- 8.22 Therefore, the proposed new ramp and associated works (planter and bench seating) are considered to be entirely appropriate and will not harm the character and appearance of the conservation area, or listed building and would comply with Policies DH3 and DH of the adopted Local Plan; Policies 7.4 and 7.8 of the adopted London Plan and Policy HC1 of the Publication London Plan.

## Design

- 8.23 LP Policy 7.4 states that development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features.
- 8.24 RBG Policy DH1 advises that all developments are required to be of a high quality of design and to demonstrate that they positively contribute to the improvement of both the built and natural environments. Amongst other things developments should achieve accessible and inclusive environments for all, and create attractive, manageable well-functioning spaces within the site.

## Assessment

- 8.25 The principle purpose of the proposed alterations is to improve the entrance to the Visitor Centre and the customers experience, by providing a wide ramp towards the entrance doors. The proposed ramp would have a gradient of 1:15; with the new entrance ramp separated from the existing accessibility ramp by the extended planter. In addition, the proposed alterations would include the provision of bench seating, facing onto the existing northern car park.
- 8.26 The alterations to the proposed access to the entrance to the Visitor Centre will be carried out in materials that are in keeping with the alterations that were undertaken as part of the 2014 works. More particularly, the surface of the ramp will be constructed out of Marshals Urbex textured concrete paving. The raised planter would be extended using red brickwork to match the existing, and the new bench seating would be constructed from slatted timber, to match. Further details of the proposed materials are included on the material palette drawings (Drg No. A1807-EPR-L-DR- 501 Rev. PL0), which has been submitted with the application.
- 8.27 The proposed alterations would improve access to the Visitor Centre and the overall experience of visitors to Eltham Palace.
- 8.28 It is considered that the proposed new ramp and associated works will make a positive contribution to the appearance of the Visitor Centre and Eltham Palace. Therefore, the proposed development would comply with LP Policy 7.4, RBG LP Policy DH1, and the NPPF.

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## 9 CONCLUSIONS

- 9.1 This planning application has been prepared on behalf of English Heritage in support of the following development:
- “Replacement of the existing entrance steps to the visitor centre, with a ramp, together with alterations to the raised planter and provision of bench seating*
- 9.2 The planning application has been submitted following pre-application request to the RBG. It is understood that RBG were supportive of the alterations to the Visitor Centre, although the written response had not been received at the time the application was submitted.
- 9.3 The proposed new ramp and associated works (including planter and bench seating) are considered to be entirely appropriate and will not harm the character and appearance of the conservation area. Furthermore, it is considered that the proposals would make a positive contribution to the appearance of the Visitor Centre.
- 9.4 The proposed alterations would improve access to the Visitor Centre and the overall experience of visitors to Eltham Place.
- 9.5 Therefore, the proposals would accord with the relevant legislation, national and local planning policy and guidance, and as such we would request that planning permission is granted.