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**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**Crystal Palace Park, Thicket Road, Penge, London SE20 8DT
Application No. 20/00325/OUT**

Historic England warmly welcomes the submission of this Regeneration Plan for the delivery of a phased scheme of works for those parts of the Crystal Palace Park within the ownership and control of the London Borough of Bromley. This application follows on from a previous grant of outline planning permission, known as the 2007 Masterplan, which proposed a wider range of works and included land within the ownership of the Greater London Authority, including the National Sports Centre.

The current proposals are more focused in nature seek to address the longstanding Heritage at Risk issues at Crystal Palace Park, including the restoration of many landscape features within the grade II* Registered Park and Garden and significant built structures, including the grade II Italian Terraces and the grade I prehistoric monuments and their associated geological features, lakes and islands. The plan also includes provision for a robust management and maintenance strategy for the park, which would be delivered by the Crystal Palace Park Trust, and seeks to ensure that the park operates as a viable asset.

Significance

Crystal Palace Park is a nationally significant grade II* Registered Park and Garden and is a designated conservation area. The park was first laid out in the 1850s to designs by Paxton and complemented the famous Crystal Palace exhibition centre that sat atop the hill at the western end of the park. Paxton's vision for the park took influences from many areas of landscape design and included a formal Versailles style garden with water gardens located directly to the west of the Crystal Palace building, an English Landscape with informal lakes and dense tree planting to the north, a cricket ground to the east and an educational pre-history 'Tidal Lakes' area to the south, including large models of dinosaurs and geological strata. The park



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itself and a number of structures associated with the original foundation of the park and palace are evident today and are considered to be of high heritage significance.

Background

Following the destruction of the Crystal Palace by fire damage in 1936, the site of the palace and the park became almost derelict, and in 1951 the London County Council took over the management of the site. Sir Gerald Barry was commissioned to look at the best use of the land and recommended the erection of new sporting facilities within the former basin area at the centre of the park and various other changes to enable the park to be open for public use and enjoyment. This resulted in the erection of new sports buildings, the introduction of large areas of hard standing for car parking, the consolidation of the remaining palace structures, the partial landscaping of the Paxton Axis and the creation of a number of new buildings, including the existing cafe, residential houses and Lodge buildings. Part of the park was also annexed in order to provide a caravan park adjacent to the Rockhills Gate. Whilst these changes brought new uses and life into the park, they led to the erosion of Paxton's original design, whilst the fragmentation of ownership and management resulted in barriers to movement and clear variations in management and maintenance. Many of the remaining key landscape elements within the park are in a poor and deteriorating condition and this has led to the inclusion of the Registered Park and Garden and a number of listed structures on Historic England's Heritage at Risk Register for London.

In 2007, a Masterplan for the park was developed by the London Borough of Bromley and the Greater London Authority that looked to reinstate and enhance the landscaping within the park, repair and bring into use many of the historic structures and create new commercial buildings. This Masterplan was granted outline planning permission in 2010 and was envisaged as being delivered in phases over a number of years, with some of the necessary finance being raised through development within the former caravan park adjacent to the Rockhills Gate and new development on the Sydenham Gate side of the site. It is understood that implementation of the Masterplan has faltered, as the GLA are currently unable to commit to bringing forward their part of the plan. The London Borough of Bromley has therefore brought forward the current proposals, which look to cover only land within their ownership and control and therefore excludes land within the ownership of the GLA.

Impact

The current outline planning application, known as the Regeneration Plan, reflects many of the works that were granted planning permission in the 2007 Masterplan, with the main differences comprising removal of Greater London Authority land from the red line boundary and the provision of new buildings for Capel Manor College.

The current Regeneration Plan aims to reinstate and enhance the landscaping within the park and repair many of the historic structures and particularly those associated with the palace terrace area. The proposals include re-presentation of the former





footprint of the Crystal Palace as a series of gardens, landscaping of the lower terrace areas to provide flexible external areas for events, provision of access ramps to address the level changes in the terraces, creation of a new coach park and car park at the northern side of the site, partial reinstatement of the Paxton Axis within the land owned by the applicant, relocation of the play area from the cricket ground area to a site adjacent to the Tidal Lakes and repair of the pre-historic monsters and their lakeside environment..

Policy

Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) set out the obligation on local planning authorities to pay special regard to safeguarding the special interest of listed buildings and their settings, and preserving or enhancing the character or appearance of conservation areas.

The National Planning Policy Framework (NPPF) sets out the Government's policies for decision making on development proposals. At the heart of the framework is a presumption in favour of 'sustainable development'. Conserving heritage assets in a manner appropriate to their significance forms one of the 12 core principles that define sustainable development

Paragraph 193 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be).

Paragraph 196 refers to developments leading to harm to the significance of designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Paragraph 202 states that planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

Advice

Our comments on the proposals are as follows:

Enabling Development

The previous 2007 Masterplan granted approval for new residential development on a number of sites around the perimeter of the park that released capital funding to enable the proposed works of repair and restoration of the parkland and structures within the park. It is understood that the proposed residential buildings shown in the current Regeneration Plan reflect those that were previously granted planning permission. As such, we do not consider the proposals to raise any new issues in





relation to the impact on the significance of the historic environment. We note that an 'Enabling Development and Financial Viability Assessment' by Knight Frank has been submitted in support of this planning application, in line with our guidance, 'Enabling Development and the Conservation of Significant Places'. This assessment seeks to address the various tests set out within our guidance and any conflicts with current planning policies, in accordance with policy 202 of the National Planning Policy Framework. In relation to the assessment of benefits arising from these proposals, we consider the heritage benefits to be significant and to secure the future conservation of the heritage assets that are within the control of the London Borough of Bromley. This is provided that these benefits are secured through legal agreement and are delivered in an appropriately phased manner. In relation to the financial information presented in the assessment and in other documents, we would recommend that your authority seek the views of a qualified independent assessor.

Package of works

We are pleased to see that the proposals include the restoration and repair of a wide range of heritage assets that are included on our Heritage at Risk Register are proposed to be delivered within the early phases of delivery. In our view, it is essential that these works are linked to the delivery of the enabling residential development, in order to ensure that the heritage benefits of the scheme are achieved.

Palace Subway and proposed extension

The grade II* listed subway is included on our Heritage at Risk Register and is in a poor and deteriorating condition. We acknowledge the need to provide a beneficial reuse of the subway in order to ensure that it is repaired and maintained into the future. As such, we are of the view that the proposed extension is necessary in order to secure a beneficial reuse, as this will provide ancillary facilities that cannot be provided within the subway structure without causing a high degree of harm to the significance of the structure. We welcome the proposals to reduce the massing of the proposed extension from that which was previously granted planning permission in the 2007 Masterplan and its subsequent reduced impact on the wider landscape and setting of the subway.

Erection of a new buildings for Capel Manor College

The Regeneration Plan includes the provision of a new building for Capel Manor College on Anerley Hill and for the provision of replacement buildings on the site of the college's farm site. We acknowledge the aspiration to retain the college within the park and the potential benefits to the landscape that may arise with the possibility of partnership working between the Council, the Crystal Palace Park Trust and the college. We acknowledge that the new buildings may cause some degree of harm to the significance of the park because they introduce built form into the park and may be visible in views, particularly from the Palace Terrace. We would therefore recommend that any outline permission is granted subject to further details of





elevation treatment, materials and associated landscaping. These details should be informed by further consideration of the impact of the proposals on the significance and setting of the park and any neighbouring heritage assets in views, as identified in the current application submission.

Repairs and works to pre-historic dinosaur structures, geological features and tidal lakes

Despite numerous repair projects having been undertaken to the grade I listed prehistoric structures and their surrounding environment over the last 20 years, it would appear that there are underlying issues that continue to affect these very fragile and important structures. We welcome the more comprehensive approach that is outlined in the Regeneration Plan, which seeks to diagnose and address the underlying causes of the continued decay of the structures and includes consideration of the hydrology of the lakes, the construction of the islands and the consolidation and recording. We look forward to working with you further on these proposals and have acknowledged the fragility of these structures and their relatively poor and deteriorating condition by placing them on our 2020 Heritage at Risk Register.

In summary, we welcome the progress that has been made in bringing the Regeneration Plan forward to application stage and look forward to continuing to discuss and advise as the plan is taken forward into the future. Crystal Palace Park is a historically fascinating and culturally important place and we are happy to advise further as the plan is implemented, particularly in relation to detailed design of new build structures and repairs to listed buildings and structures.

Recommendation

Historic England supports the application on heritage grounds, subject to the Council considering the proposals in the light of policies 196 and 202 of the National Planning Policy Framework.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability

Your authority should take these representations into account in determining the application. If there are any material changes to the proposals, or you would like further advice, please contact us. Please advise us of the decision in due course.

Please contact me if we can be of further assistance.





Historic England

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority. The full GLAAS consultation criteria are on our webpage at the following link: <https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

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