



ENGLISH HERITAGE

Mr Chris Evans
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Our ref: P00061859

5th September 2008

Dear Mr Evans

**CRYSTAL PALACE NATIONAL SPORTS CENTRE, LEDRINGTON ROAD,
LONDON, BROMLEY, GREATER LONDON, SE19 2BB**

Thank you for consulting English Heritage on the applications made by the London Development Agency (LDA) for outline planning permission for the regeneration of Crystal Palace Park, for listed building consent for alterations to the National Sports Centre (NSC) building and for conservation area consent for the demolition of various structures within the Crystal Palace Park Conservation Area.

I shall be writing separately to authorise your Council to grant listed building consent for the works to the NSC building, subject to conditions, and to authorise your Council to grant conservation area consent for the various demolitions that are proposed. However, the purpose of this letter is to address the issue of the application for planning permission for the master plan for the regeneration of Crystal Palace Park.

BACKGROUND

After the success of the Great Exhibition in 1851 in Hyde park, the building that had become known as the Crystal Palace was taken down and re-erected in a larger form on a site at Sydenham. Sir Joseph Paxton, who had designed the original building, laid out extensive pleasure grounds on the slopes beneath the Crystal Palace including extensive Italianate terraces, extensive waterworks (including substantial fountain basins) and, on the north side of the tidal lake, geological exhibits including representations of long-extinct dinosaurs and other creatures. The Palace burnt down in 1936 and the park settled into a long and steady period of decline. In the mid-1950's a master plan was drawn up for the regeneration of the park but only part of it was executed - the creation of the National Recreation Centre comprising an



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athletics stadium in the southern of Paxton's two principal fountain basins in the centre of the park and a purpose designed sports hall in the northern basin.

Crystal Palace Park is included in English Heritage's *Register of parks and gardens of special historic interest in England* at grade II* and much of it is within the Crystal Palace Park Conservation Area. A number of buildings within the park are included in the *List of buildings of special architectural or historic interest for England*:

- Prehistoric animal sculptures, geological formations and lead mine on islands and on land facing the lower lake - listed grade I
- Crystal Palace National Recreation Centre - listed grade II*
- The upper and lower terrace of the Crystal Palace Gardens, the bust of Sir Joseph Paxton, the pedestrian subway beneath Crystal Palace Parade and the cast iron gate piers - all listed grade II

In addition, the park contains a number of buildings included in Bromley Council's *Local list of buildings of buildings of architectural interest* including the water tower base adjacent to the Annerley Hill, the Jubilee Stadium, the NSC hostel tower and associated buildings and the last remaining fountain basin.

Staff of English Heritage have had extensive consultations with staff of the LDA and their professional advisers in the drawing up of the master plan. In addition, members of our London Advisory Committee have had several workshop sessions with the design team looking at key elements of the proposals, notably the significant alterations to the grade II* listed NSC building.

PROPOSALS

The application seeks outline planning permission for a comprehensive master plan for the re-generation of Crystal Palace Park. The masterplan envisages a number of new developments including blocks of housing in the north west corner of the site at Rockhills and along the northern boundary of the park facing onto Crystal Palace Park Road, a proposed new sports centre building on the west side of the existing athletics stadium and other new buildings within the park including new visitor facilities and accommodation associated with the care and maintenance of the park and its facilities. The proposals also envisage major alterations to the landscape, especially in the vicinity of the grade II* listed National Sports Centre building, a major tree—planting and landscaping scheme on the site of the Crystal Palace, the removal of significant areas of hard-standing and associated re-landscaping and the removal of fencing and other clutter. The master plan also outlines strategies for such matters as lighting, signage, water management and maintenance.



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CONSIDERATION

In dealing with the regeneration of a major historic asset such as Crystal Palace Park and the listed buildings within it, English Heritage would always advocate that this should be a master plan led process. The submitted proposals are based on a thorough understanding of the significance of the key elements that together make for a fascinating yet complex historic asset; they are well considered and clearly address the long term needs of the park and all the elements within it; and they offer a means of regenerating the park in a sustainable way without causing harm to its key historic elements.

In considering the application for planning permission, your Council will, of course need to give particular consideration to the issue of development upon Metropolitan Open Land (MOL) especially the development at Rockhills which represents the most significant departure from the policy that presumes against development on MOL. English Heritage is well advanced in updating its guidance on Enabling Development and the latest version can be found on the Historic Environment Local Management website. Our guidance makes it clear that any enabling development that seeks to secure the future of a significant place but contravenes other planning policy objectives would be unacceptable unless it meets seven clearly defined objectives. English Heritage has looked carefully at the submitted application material and we believe that the proposed master plan and the development and other proposals within it do not materially harm the heritage values of the historic park or its setting and that they fully meet the criteria set out in our guidance.

The guidance goes on to say that planning permission should only be granted if certain other criteria are met. It is recognised that this is an outline planning application and that therefore planning permission should not normally be granted. However, we believe that the impact of the proposed new buildings in terms of their siting, height, mass and bulk are sufficiently defined within the application to satisfy us that their impact will not be detrimental to the heritage values of the park and the conservation area and that therefore this criteria is satisfactorily met. In the event that your Council concurs with this judgement and is minded to grant planning permission it will need to ensure that the other three criteria, which relate to the timing and method of delivery of the proposals, are also met.

CONCLUSION

We recognise that certain elements of the proposals have generated a degree of local controversy but it is our belief that the relatively localised impacts of the most contentious elements, particularly the proposed housing, will not harm the character



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or appearance of the conservation area in general or the historic park in particular.

Even allowing for the changes that have taken place over the years, the grade II* registered Crystal Palace Park remains one of the most important nineteenth century urban parks in England, albeit now in a somewhat dilapidated and neglected condition, and the grade II* listed National Sports Centre building at the heart of the park is one of London's most important post war listed buildings. Previous plans, including Bromley Council's own *Restoring the Vision*, have sought to re-establish Crystal Palace Park as one of London's most important historic open spaces but all have foundered. English Heritage considers that this exemplary masterplan could very well represent the best and final opportunity to properly secure the park and the listed buildings within it for future generations. It is vital therefore that your Council, in exercising its powers, gives proper weight to the long-term needs of this complex group of historic assets when considering the issue of 'very special circumstances' that needs to be addressed when considering development on Metropolitan Land.

After careful consideration, English Heritage commends these proposals to your Council as we consider that they represent a unique opportunity to take the surviving elements of Paxton's outstanding work and integrate them into a refurbished park that would once again take its place as one of the most significant urban parks in the Country. I am happy to confirm that English Heritage fully supports the granting of outline planning permission for the proposals.

I am sending a copy of this letter to Mark Lloyd at the London Development Agency for his information.

Yours sincerely

Malcolm Woods

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