CRYSTAL PALACE PARK REGENERATION PLAN

Community Briefing on Bromley Council’s Application for Outline Planning Permission

By

Crystal Palace Park Trust

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The purpose of this briefing

Crystal Palace Park was one of the great glories of Victorian England, but has fallen into slow decline for over a century. Its state is now critical.

Bromley Council has made an application to itself to regenerate the Park.

This is a complex application with many elements. It is not likely to produce a simple yes or no answer. There may be conditions or legal agreements which answer any concerns.

However, the application is not easy to understand. It contains 195 documents, and the Council’s planning register does not list these in a legible order or title all the documents for easy reference.

The purpose of this briefing is therefore to strip out the complexity, present the proposals in a digestible way and offer guidance as to questions you might address in your consultation response to Bromley.

For your convenience, the questions are set out at the end of this briefing.

We have also produced a template letter which you may wish to use in this response.

Even if you have already made a consultation response, you may still send in the template letter with your further views.

The role of Crystal Palace Park Trust

Crystal Palace Park Trust is an independent trust whose board comprises members of the community. The Trust is applying for charitable status.

The Trust will be taking over the Park from Bromley in due course, and will maintain it as a green resource for present and future generations.

The Trust is seeking to understand the community’s views before formulating its official response to Bromley on this application.

Therefore in this paper we shall set out each element of the application and suggest questions for you to consider before responding to the application.
Background

The history of decline of Crystal Palace Park is well-known and does not bear repetition here. It is right to say, however, that opportunities to access funds for its regeneration over the last 25 years have been missed, and the Park is now in a parlous state.

The most recent significant event was the grant of outline planning permission for an ambitious new Masterplan in 2007, following a long process involving the courts and the Secretary of State.

Bromley Council did not succeed in finding funds for the delivery of the Masterplan, so has worked on a new strategy.

The strategy comprises three elements:

1. Delivery of a less ambitious scheme for regeneration, based on the Masterplan but taking the pragmatic approach of focusing on what must rather than may be done.

2. Creating a sustainable park business model to maintain the benefits of the regeneration. The main element of this is to build on the Park’s capacity for staging a range of events.

3. Development of a new not-for-profit management organisation to take on the management and maintenance of the Park from Bromley Council, as the application says “without facing the financial and political challenges posed under local authority ownership.” That body is the Crystal Palace Park Trust.
Financing

The regeneration plan comprises capital and revenue elements.

Capital

The capital costs are as follows.

The total cost of the regeneration plan is £40 million.

This was to be paid for through

- the housing proposed in this application which is expected to raise £24m. No affordable housing element is proposed.
- £15m from a grant application to the Heritage Lottery Fund.
- £1m from Bromley Council, mostly contributed already through professional fees.

Unfortunately, the grant application failed at the preliminary expression of interest stage. There is no current plan for how this element of the works is to be funded.

According to Bromley’s consultants Knight Frank, “The capital works will only commence once the capital receipts from the housing sites and the other grants are secure. The implementation of the Regeneration Plan cannot happen before this time as these large sums of money could not be achieved from any other sources. Once these monies are secure the scheme could continue at risk, without the other funding in place, subject to the agreement of Bromley’s Executive.”

The effect is that if the development proceeds, it is not possible to say when (or even whether) it would progress to completion.

Revenue

The Trust will eventually take on responsibility for the whole Park. It will need to have staff and management in place.

It wants to run the Park to a far higher standard than now, with better horticulture, better ecological projects, more and better play facilities, better wayfinding, signage and interpretation and more and better opportunities for community events.

The baseline position is that there are some leases yielding £221,000 per year, particularly the transmitter, the reservoir and the café.

Bromley Council wishes to reduce its financial support to the Park for the future, but will contribute the sum of £4m from the housing receipts as a legacy fund for the Trust, yielding £107,000 per year. It will also make a tapering annual contribution, levelling at £125,000 per year.

This will still leave large sums to be raised from events and from charging for parking.
The financial summary in the planning application sets out the figures as follows:

### Income

<table>
<thead>
<tr>
<th>Description</th>
<th>£</th>
</tr>
</thead>
<tbody>
<tr>
<td>Events</td>
<td>549,000</td>
</tr>
<tr>
<td>Leases</td>
<td>221,000</td>
</tr>
<tr>
<td>Grants, advertising, sponsorship</td>
<td>50,000</td>
</tr>
<tr>
<td>Car parking</td>
<td>140,000</td>
</tr>
<tr>
<td>Bromley Council contribution</td>
<td>125,000</td>
</tr>
<tr>
<td>Legacy fund</td>
<td>107,000</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>1,192,000</strong></td>
</tr>
</tbody>
</table>

### Expenditure

<table>
<thead>
<tr>
<th>Description</th>
<th>£</th>
</tr>
</thead>
<tbody>
<tr>
<td>Staff</td>
<td>366,000</td>
</tr>
<tr>
<td>Operations and maintenance</td>
<td>674,000</td>
</tr>
<tr>
<td>Contingency at 10%</td>
<td>104,000</td>
</tr>
<tr>
<td>Renewals and reinvestment</td>
<td>48,000</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>1,192,000</strong></td>
</tr>
</tbody>
</table>

The proposed sums from events have been projected but have not been tested, so there is an element of speculation in the figures. The current income from events is a fraction of the projected sum.

The basis for projecting £140,000 per annum from parking has not been explained.

The hand-over of the Park to the Trust, and the legacy fund, comes at the end of the regeneration plan, which may be 10 years away. Bromley Council is unwilling to advance the legacy fund following the first land sales.

Given the very long timescales before the Trust takes over the Park, the Trust is in discussions with Bromley Council about taking on events at an earlier stage, probably in 2021. Unfortunately, Bromley Council is not prepared to seed-fund the Trust at all which means that its ability to employ staff or consultants to market or manage events is lacking.

Further, the Council's current financial relationship with the maintenance contractor, and the extent to which the Trust would be bound by any such arrangements, remains to be clarified.

However, on any view, the Trust’s economic capacity to take on what would be a substantial commercial venture is currently limited.

Accordingly, the Trust views both the short term and long term financial plan as aspirational rather than practical.

The financial position of the Park and the Trust is particularly significant when it comes to consideration of the housing development, as explained below.
The application

The different sections of the Park are shown in Fig. 1 below.

![Figure 1: The Park and its sections.](image)

This is an outline application, meaning that if it is granted the detailed plans or "reserved matters" will be dealt with later.

An outline permission does however establish the principle of the development. So it is worth studying it carefully!

The application site is Crystal Palace Park, excluding the National Sport Centre. The reason for that is that the Greater London Authority are behind in developing their own plans. The vision of the Trust, however, is for a community vision for the Park as a whole, and it intends to work with the Greater London Authority to realise that vision.
Figure 2: application site, general layout and key features. View full-size PDF.

Key features:

- A single-designed landscape
- Palace site as its focus
- Strong central axis
- Series of related and distinct character areas
- Showcase for restored historic assets, including:
  - Terrace walls
  - Prehistoric animals and geological illustrations
  - Central transept walls and railings
  - Crystal Palace Subway
  - Expansive vistas
  - Mix of formal and informal landscape spaces
- Welcoming entrances including new entrance in the north-west at Rockhills
- Hierarchy of circulation routes for all users creating connections between neighbourhoods and circuits around the park for all abilities
- Improved infrastructure including resurfaced paths, new park furniture and signage
- Expanded public park with over two hectares of previously excluded areas reintegrated into the park
- New and re-furbished car and coach parks
- Community centre
- Three new play areas
- Information centre
- Event spaces – big and small – serviced and un-serviced
- Cultural venue linked to renovation of the Crystal Palace Subway
- Ranger’s maintenance facility and depot for improved maintenance
- Residential development at Rockhills and Sydenham Villas to help fund the delivery of the Regeneration Plan
- New college buildings for Capel Manor College on two sites within the park
The application includes the following nine main elements:

1. Conservation and repair of heritage assets
2. Removal of existing hard surfaces
3. Landscaping including planting of new trees
4. Demolition of existing buildings and structures
5. Creation of new pedestrian paths/vehicular access roads / car, coach and cycle parking
6. Changes of use of the caravan site to public open space, parking, community centre and residential
7. New cultural venue on top site
8. Development of Capel Manor College on two sites
9. Up to 210 residential dwellings

The map below shows the planned residential developments, development of Capel Manor College and new areas for play and community gatherings.
The proposals

We shall now look at the specific proposals for each of these nine elements in turn.

1. Conservation and repair of heritage assets.

These works include:

- Works to preserve and repair the dinosaurs and geological formations.
- The subway to the Crystal Palace.
- The terraces.
- The bust of Sir Joseph Paxton.

The Trust’s view is that these works are essential to preserve the history of this Park. They are the baseline from which all future planning proceeds.

Do you agree?

2. Removal of existing hard surfaces

These works include:

- Full and partial removal of car/coach parking areas within the Transitional Landscape in the heart of the Park, comprising a net removal of 201 car parking spaces and 11 coach parking spaces.

- Removal of existing playground within the Cricket Ground area to be replaced by two new playgrounds within the Tidal Lakes area and English Landscape area.

The Trust’s preliminary view is that the large amount of parking in the heart of the Park is an eyesore and detracts from the overall beauty and amenity of the Park.

The Trust considers that the current playground is severely deficient, both in terms of quantity and quality of facilities, for an important sub-regional park.

It therefore intends to welcome these proposals.

Do you agree?
3. Landscaping including planting of new trees

These works comprise:

- Reprofiling the landscape on the Upper and Lower Palace Terraces
- Creation of gardens on the Upper Palace Terrace.
- Installation of utilities infrastructure to support events on the Italian Terraces.
- Reprofiling of landscape in the Transitional Landscape area.

Regarding events, the Trust will develop and consult upon an events strategy to provide a framework for the services and periodic events on the terraces, which will include safety and protection measures to respect the historic landscape.

The Trust's preliminary view is that the creation of gardens on the “top site” is to be welcomed.

The Trust is also expecting to support the installation of services to support periodic events on the terraces. These are fundamental to the future financial planning for the Park following handover by Bromley to the Trust.

The Trust is further expecting to support the re-landscaping of the Transitional Landscape area following removal of parking. It is essential that this land is part of the attraction of the Park and not a detraction.

Do you agree?
4. Demolition of existing buildings and structures

These works comprise:

- The demolition of the Crystal Palace Park Road maintenance depot, to be reconstructed beside Sydenham Gate.
- Removal of clutter and redundant fencing.
- Breaking up of surface car parking and redundant areas of hardstanding.
- Demolition of nursery near Sydenham Gate. Reconstruction on caravan site.
- Demolition of Rangers' Lodge near Sydenham Gate.
- Demolition of St. John Ambulance facility in Transitional Landscape Area.
- Demolition of buildings at caravan site.
- Demolition of maintenance shed east of Crystal palace Museum.
- Demolition of Park Depot near National Sports Centre.
- Demolition of Crystal Palace Park Visitor Centre, to be reconstructed in situ.

The Trust's preliminary view is that these works are being done for good reason and their demolition allows greater community benefit as part of the wider scheme. In particular, the fencing impedes navigation around the Park, contributes to its derelict appearance and is a major eyesore, while removal of surface car parking and redundant hard-standing will help to open up and green the Park.

Do you agree?
5. Creation of new pedestrian paths/vehicular access roads / car, coach and cycle parking

The works include the improvement of pedestrian routes and restoration of the central park axis.

The Trust supports the work regarding pedestrian routes to improve access and movement within the park. It is pleased that the central park axis will be restored, since the axis was central to Sir Joseph Paxton's conception for the park.

Regarding parking, there would be 47 new parking spaces and 10 coach spaces on the current caravan site. But there would be removal of large amounts of parking, particularly from the Sports Centre Road and the Transitional Landscape in the heart of the park.

A fuller analysis shows the removal of nearly half the car parking spaces as set out in detail on the following page. There is also a 37% increase in cycle parking provision.

The Trust takes the preliminary view that these proposals are fair and balanced.
Do you agree?
<table>
<thead>
<tr>
<th>Parking Location</th>
<th>Parking Type</th>
<th>Existing Spaces</th>
<th>Proposed Spaces</th>
<th>Net change</th>
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<tbody>
<tr>
<td>National Sports Centre</td>
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<td></td>
</tr>
<tr>
<td>NSC Car Park</td>
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<td></td>
<td>Accessible</td>
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<td>6</td>
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<td></td>
<td>Accessible</td>
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<td>8</td>
<td>0</td>
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<tr>
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<td>23</td>
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<td></td>
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<td>0</td>
</tr>
<tr>
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<td>38</td>
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</tr>
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<td></td>
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<td>10</td>
<td>10</td>
<td>0</td>
</tr>
<tr>
<td></td>
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<td>0</td>
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<td>4</td>
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<td></td>
<td>Enlarged Standard</td>
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<td>4</td>
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<td></td>
<td>Active Electric</td>
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<td></td>
<td>Accessible</td>
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<td>2</td>
<td>0</td>
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<td></td>
<td>Enlarged Standard</td>
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<td>2</td>
<td>+2</td>
</tr>
<tr>
<td></td>
<td>Active Electric</td>
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<td>+2</td>
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<td></td>
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<td>+4</td>
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<td></td>
<td>Active Electric</td>
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<td>Rockhills Coach Park</td>
<td>Coach</td>
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<td>Sub-Total</td>
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<td>-113</td>
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<td></td>
<td>Coach</td>
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<td></td>
<td>Total</td>
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<td></td>
<td>Coach</td>
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<tr>
<td></td>
<td>Total</td>
<td>707</td>
<td>368</td>
<td>-339</td>
</tr>
</tbody>
</table>

Figure 4: Parking changes
6. Changes of use of the caravan site to public open space, community centre, parking and housing.

The caravans

The proposal is to remove the caravans from the site. Much as the caravan site provides a useful amenity specifically for those using the caravans, the site is needed for other uses relating to the Park and its public benefit, as set out below.

The Trust therefore supports the removal of caravans from the site.

Do you agree?

The proposal is then to build on the site:

- parking for cars and coaches as stated above
- a two storey community centre of up to 670 square metres
- up to 140 new dwellings in two blocks with a maximum of 5 storeys

These works are shown in Figure 5 below:

Figure 5: Rockhills Residential
These works involve a significant construction project on parkland.

Each element of the development needs to be considered, both in its own terms and as part of the gains and losses involved in the park project as a whole.

The Council also points out that the re-purposing of this site reinstates as public parkland 1.5 hectares of what is currently privately leased land.

**Parking**

Although the Trust is unenthusiastic about any new parking in an historic park, its preliminary view is that on balance the parking proposal can be supported, given that it will be relatively inconspicuous and will replace a far greater amount of parking to be removed from the heart of the park.

The plans show a “new hedge” between it and the park, together with some newly planted trees. A landscaping condition will be needed to ensure there is a full and attractive belt of screening.

Do you agree?

**Community centre**

The community centre, with an area of 670 square metres over two floors, was proposed in response to earlier community consultation.

The building will incorporate:

- a children’s nursery to replace the nursery to be demolished at Sydenham Gate
- a café
- park WCs.

The nursery space will be available for community use out of hours.

The Trust's preliminary view is that the proposed community centre will assist community cohesion and should be supported.

Do you agree?

**Dwellings**

As for the 140 new dwellings, this is obviously a very significant intervention. We deal with this proposal as part of the overall residential proposal in (9) below.
7. New cultural venue on top site

There is a beautiful Victorian subway underneath Crystal Palace Parade. It is an arched, brick-lined structure which used to connect the Palace to the high level station.

Figure 6: subway.

The proposal is to restore the subway, stairs and vestibule and to change its use to “museum / interpretation centre.”

The subway is the best surviving remnant of the Crystal Palace. The Trust strongly supports the restoration of the subway. Funding has been secured, principally from the Mayor of London, for the works.

Although the Trust has seen no proposals for the museum / interpretation centre, its preliminary view is that this would be an appropriate use for the space.

Adjoining the stairs to the subway on the top-site is a proposal for a three storey cultural venue with viewing platform, up to 2300 square metres.
The justification for the cultural venue in the Planning Statement is:

While this will lead to an additional building within Metropolitan Open Land, it is considered that the cultural benefits that the venue will bring as a visitor attraction and event space are in keeping with the current and historic purpose of the Park. The cultural facility will also help secure the long-term management and use of the Crystal Palace subway in the future.

The Trust has not formed a conclusive view about this proposal at this stage, although it is aware that the planning permission for the 2007 park masterplan included a cultural venue on this site.

Bromley Council recently sought expressions of interest for use of a proposed building on the site and received none.

Given that the top site is Metropolitan Open Land, the highest designation for open space protection, it would need very strong justification indeed for the construction of a new building upon it. The Trust has seen no such justification.

Furthermore, the Trust does not rule out the possibility, in the future of building a more ambitious museum building on the top site to celebrate the history of the Crystal Palace and the contribution it made to architecture and landscape across the world. A minor structure set to one side of the top site may preclude something more fitting of the history of the Park in the future.

The Trust’s position is that, subject to a) evidence of the viability of the cultural venue and b) demonstration that it does not impede a more ambitious public building celebrating the architectural, cultural, environmental and historic impact of the Crystal Palace in the future, it should support the proposal.

Do you agree?
8. Capel Manor College

Capel Manor College currently occupies the Jubilee Stand within the National Sports Centre, which it leases from the Greater London Authority. The College is not currently on Metropolitan Open Land.

It proposes to develop two sites in Crystal Palace Park which are both on Metropolitan Open Land:

- A 737 square metre building on Anerley Hill adjacent to the museum.
- A 3779 square metre building at the farm site rising to three storeys above the historic dinosaur landscape.

As far as the Trust understands, there is no current proposal to pay any sum for the proposed sites by way of rental or a purchase price.

Crystal Palace Park Trust has stated its opposition to these proposals.

Anerley Hill

A plan of the Anerley Hill development is shown below.

![Anerley Hill Plan]

Figure 8: Capel Manor, Anerley Hill
The present and proposed views up Anerley Hill is shown below.

This becomes:

Figure 9: Capel Manor, Anerley Hill, visual impact.

The current, soft edge to the Park, which is an important feature of the Conservation Area, is lost and replaced by an unbroken building form. The Anerley Hill development will also result in the loss of a number of mature trees, as shown below.

Figure 10: Capel Manor, Anerley Hill, tree loss.
The only view of the impact of the Anerley Hill development on the Park is shown below. It is a very important part of the Park, comprising a key entrance, adjacent to the museum, Paxton’s water tower, the sphinxes and terraces with views over the most important part of the historic landscape. The Trust considers that the visual assessment is inadequate.

Figure 11: Capel Manor, Anerley Hill, visual impact on Park.

Farm site

The proposed educational building is to be developed on the current farm site, so partly turning over to private use what is a public facility.

The plan show an “E” shaped building as follows:

Figure 12: Farm site plan
The building rises to three storeys, significantly higher than the existing pavilion, as shown below.

**Figure 13: Farm site elevation**

The only published view of the farm development from the Park is as follows:

**Figure 14: Visual impact of farm site on Park**

No visual impact assessment has been put forward to show the impact of the proposed 3 storey building on the Grade 1 listed historic dinosaur landscape. The Trust is disappointed with this omission which has continued despite its repeatedly expressed concerns. However, the Friends of the Crystal Palace Park Dinosaurs has analysed the impact and in its objection to this application has stated “The proposed building looks overly massive in front view, dominating the horizon, impinging directly on the setting of the landscape. This impact has not been analysed rigorously, or at all, to our knowledge. View protection is legally mandated for other famous Grade 1 sites …. and needs to be included in this case, as the landscape itself is a critical part of the interpretive story.”
Position of Crystal Palace Park Trust

Crystal Palace Park Trust has met with Capel Manor College a number of times and carefully formulated its views.

It notes that the siting and scale of the scheme as now proposed was not included in the earlier 2007 masterplan.

The Trust has publicly stated its opposition to these proposals as set out below. It has seen no further material to change those views:

Crystal Palace Park Trust is presently unable to support these proposals for the following reasons.

- **Crystal Palace Park is designated as Metropolitan Open Land which is protected as open space in the same way as Green Belt, under local, London and national planning policy. The proposed buildings are, by planning definition, inappropriate development.**
- **The Park is also a conservation area, and a Grade 2* listed landscape on Historic England's Register of Parks and Gardens of Special Historic Interest in England.**
- **The Anerley Hill site currently presents a wooded edge to the Park, for the benefit of park users and those using Anerley Hill. The site is unkempt, but remains a green asset which is capable of improvement as parkland in line with a key objective of Metropolitan Open Land designation in the London Plan. The Capel Manor proposal presents a long brick wall on the Anerley Hill frontage which would be an urbanising influence on the park edge. The site will be bounded on the remaining three sides by fencing. A car park at the entrance is a lost opportunity to improve the pedestrian enhance to the park and the square behind the museum.**
- **The College has not produced studies of the visual impact on the historic landscape. It says that it would do so following grant of outline planning permission. However, outline planning permission would give the College in principle permission for its development, in advance of proper studies of its impacts on the Park. Given the importance of these impacts, the Trust is concerned by this approach. These are not matters of mere detail, but essential considerations which need to be assessed in full to enable the community and the planning authority to understand what is proposed. The Trust would expect a proposal of this size and scale to be illustrated with views from around the site so that the community has an opportunity to provide its views in the light of accurate information, before the issue of principle is determined.**
- **This is an important part of the Park, being an entrance adjacent to the museum, the sphinxes and the historic terracing. It ought to be improved for the public in general. The construction of a large educational facility, even if some of it is open to the public some of the time, appears directly contrary to protective policies applying to the Park.**
- **The proposal to build on the farm involves a number of buildings of up to three storeys. This is directly contrary to Metropolitan Open Land policy. By reason of their height, mass and density, the Trust considers that the proposal fails to have sufficient regard to the status of the Park as a conservation area. The site is above and very close to the dinosaurs, which are a treasured asset listed as Grade 1. The Trust is concerned about the preservation of this landscape and the setting of listed buildings, but no study of the impact has been produced.**
- **More generally, the future of Crystal Palace Park remains to be resolved:**
  - There is a proposal for substantial house-building on the Sydenham side of the Park, taking account of a previous permission to do so, in order to raise funds for restoration and help secure the long term future of the wider park. This carefully
considered scheme, previously supported by an Inspector following a lengthy public inquiry, represents enabling development: the benefits it would generate for the Park are well-understood and established. However, this is now in doubt because the Greater London Authority has indicated that it requires part of the housing to be affordable, but the Trust understands that if it is then this will fail to raise the requisite funds.

- The future of the National Sports Centre is still in question, with the Greater London Authority some way behind in its planning for the site.
- There is an outstanding proposal to run a tram track through the Park behind the Museum and up to Crystal Palace Parade.
- The future of the Concert Platform also remains in the balance, and so forth.

• The Trust is strongly of the view that the Park must be planned holistically. The piecemeal addition of two education sites in the Park is consistent neither with the overall master-planning of the park, carefully considered over a long period, nor with the policies which have been designed over many decades to protect the park from further inappropriate development.

• The Trust understands that the College hopes to become involved in the maintenance of the Park in the future. However, it has no contract to do so, and even if it did, this would not justify planning permission for yet further development sites in the Park. Capel Manor College is a private educational college with three sites across London. The Trust has no objection to its continuing to occupy the Jubilee Stand, because this can and does occur without breaching the well-established planning principles for the Park. On the other hand, there is no special imperative for it to occupy Crystal Palace Park in particular, and if it is to do so at all, it should do so in a manner which does not breach the planning framework pertaining to the park.

• The sole imperative which should shape all and any works to the Park is the need to preserve it, as an important area of green open space, and as a heritage asset of national importance.

For those reasons, the Trust does not support the Capel Manor proposal. It has no objection to the College seeking accommodation within the National Sports Centre footprint, which is not Metropolitan Open Land and which provides ample space for the development, or close to the Park, which it had previously proposed.

Do you agree?
9. 210 residential dwellings

The proposal is for:

- A set of 70 dwellings are proposed on the Crystal Palace Park Road side of the Park in 6 blocks of 4 storeys and 43 car parking spaces.
- A set of 140 dwellings are proposed on the present caravan site (Rockhills). These would be in 2 blocks of 5 storeys together with 84 car parking spaces.

Crystal Palace Park Road Housing

The elevation of the Crystal Palace Park Road blocks from park-side is shown below.

![Figure 15: Elevation of Crystal Palace Park Road housing from Park.](image1)

The only visual impact image of the Crystal Palace Park Road housing from the Park is shown below.

![Figure 16: Visual impact of Crystal Palace Park Road housing from the Park.](image2)
The street-side impression of the impact of the Crystal Palace Park Road-side development is shown below.

![Figure 17: Visual impact of Crystal Palace Park Road housing from the road.](image-url)
Rockhills Housing

The elevation of the Rockhills blocks from park-side is shown below.

Figure 18: Rockhills Housing: Park-side elevation

The single published view of the Rockhills development from within the English landscape is below.

Figure 19: Rockhills housing: visual impact on Park

The visual impact of the Rockhills housing on the Park is shown below.

Figure 20: Visual impact of Rockhills housing on the streetscape.
Position of Crystal Palace Park Trust on the residential developments

(i) The principle of the developments

Because these apartment blocks would be built on Metropolitan Open Land, there would need to be very special circumstances for permission to be granted. The principal circumstances relied on by Bromley Council are that they would raise money for the regeneration of the Park.

The Trust is aware that these proposals have already received a very large number of objections. When it has control of the Park, it documents now that future uses of the land will only be to serve the Park and the community’s engagement in it.

The question is whether these proposals should be supported now.

The Trust regards it as a very important consideration that following lengthy proceedings, the Secretary of State granted planning permission for 180 dwellings in the Park in order to support the then plan for regeneration.

Furthermore, the Trust is deeply concerned that the dinosaurs and the terraces, among other listed structures, are on the heritage at risk register.

Crucially, no other way of funding their restoration has come forward in recent decades, other than through large commercial developments. This is not a desirable state of affairs, but it is a reality which we must face.

The housing is what is known as enabling development. This means development which is not desirable but which enables other development which is.

Although not directly relevant to the status of the sites as Metropolitan Open Land, it is right to say that the proposed housing sites have not actually been used as parkland for many years, if ever.

Because of these factors, the Trust’s preliminary view is that it should not oppose the principle housing on these sites.

Do you agree?

However, there are further considerations including: massing, height and density; affordable housing; noise; and planning conditions. The Trust’s position on these is outlined on the following pages.
First, the Trust considers that the four storey oblong buildings on Crystal Palace Park Road, which are much higher than the existing pattern of development, amount to a visual intrusion on the amenity of the Park. It is similarly concerned at the density and height of the building at Rockhills.

The visual impact assessments are in the Trust’s opinion inadequate. The only impressions from the park-side of the housing the Trust can find in the planning documents is set out below and do not give a view of the proposed buildings from sufficient locations in the Park. Clearly, however, the impact is very significant on an important part of the Park’s landscape. Far more work on visual impact is required.

The Trust believes that more work is needed on grading the rooftops and articulating the facades and fenestration so that they do not present as oblong blocks. The Council should be requested to present further drawings so that their impact may be considered at this stage. It should not be left to the reserved matters stage for then the principle of the development will have been established.

When in 2010, permission was given for the previous housing scheme in the Masterplan, great care was taken to ensure that the developments did not overbear the Park. As the Inspector commented:

Rockhills: The buildings would respond well to local context, the north façade of the courtyard buildings being articulated to reflect the proportions of the existing villas, with recessed entrances relating to the established rhythm. The attic storey, including the contemporary form of the dormers and the stepped profile would give an articulated roofline similar to the Victorian villas to the east. The illustrative design shows increased height towards the road junction of Westwood Hill and Sydenham Hill, where larger scale buildings exist such as the Astra Palace Hotel. Within the Park the buildings would step down to two storeys for the residential element and one storey for the nursery and café building. The Rockhills residential development would, therefore, respond appropriately to the character of the Park and the conservation area surrounding it.

Sydenham Gate: The illustrative design is a contemporary interpretation of the existing villas. The buildings would be laid out to respond to the rhythm, scale and proportions of the existing buildings along Crystal Palace Park Road, as can be seen from the proposed street elevation.

The Trust believes that more work is needed at this stage to reduce the visual impact of the proposed buildings on the Park.

Do you agree?
(iii) Affordable housing

The Greater London Authority wants a large proportion of the housing to be affordable. The Mayor’s drive for affordable housing is entirely justified and the Trust supports it. The problem is that if the Crystal Palace Park scheme includes affordable housing, the sale proceeds of the housing sites are seriously reduced. For example, if there was a 50% affordable housing requirement, it would reduce receipts from the housing from £24 million to £7 million. That would mean that the regeneration plan, whose finances are already in doubt, could not proceed. The purpose of building this housing is not to meet London’s housing requirement but to regenerate the park. The inclusion of a significant proportion of affordable housing would reduce or remove the role of the housing as enabling development.

The Trust fully recognises the importance of affordable housing for members of the local community. However, it does not believe that it should be provided at the expense of improvement of the Park for the community as a whole. This issue needs to be resolved.

One solution would be to build the apartment blocks even higher so as to accommodate the requisite element of affordable housing. The Trust however is strongly opposed to that because of the impact on this historic Park.

This leaves what the Trust regards as the only acceptable solutions.

1. EITHER Bromley Council should provide the correct number of affordable housing units on sites away from the Park. This should be set down in a planning condition or legal agreement. The Trust understands that there is some discussion about whether the units would need to be close to the Park. The Trust takes the view that they do not need to be physically near the Park because the need for affordable housing is London-wide and not specific to Crystal Palace.

2. OR Bromley Council should make good to the Park the financial consequences of lower sale proceeds if the affordable housing is provided on the site.

The Trust understands that dialogue continues with the Greater London Authority on the topic of affordable housing, and the Trust will respond to any further proposed solutions if they materialise.

Do you agree?
(iv) *Noise.*

The regeneration plan depends on the Trust’s ability to run a wide variety of events in the Park. The proposed event spaces are shown below.

![Figure 21: Events spaces](image)

There is no indication that consideration has been given to the impact of events on the housing.

The Trust believes that it is essential that that existence of the housing is not a constraint on the ability of the Trust to hold events in the Park. Therefore:

i) The housing should be noise insulated and air-conditioned to a standard which will enable the Trust to run events, including music events, in the Park as required. This should be secured by condition.

ii) Occupants should be offered sale subject to an easement permitting the Trust to hold events in the Park without reference to the noise effects on housing occupants.

Do you agree?
The planning permission for the Masterplan contained detailed conditions and a section 106 agreement to ensure that the proceeds of the housing development went into the Park and that the regeneration plan actually proceeded. The Trust believes that similar mechanisms are needed again, particularly since the overall financing for the regeneration scheme is not secure.

Furthermore, as a fledgling organisation, the Trust will not be able to underwrite the costs of maintenance of the Park as it builds its income from the Park. As the landowner, Bromley Council will need to underwrite those costs so as to produce a phased assumption of financial responsibility by the Trust.

The Trust therefore believes that legal mechanisms are needed to secure:

- That Bromley Council underwrites the cost of maintenance of the Park until the income figures in the Regeneration Plan are achieved.
- That all proceeds of the housing land are put into the Park regeneration scheme.
- That no work should commence on the development of the housing sites until work has commenced on the regeneration plan.
- That development should proceed in accordance with a phasing plan submitted to and approved by the planning authority.
- That no dwelling should be occupied until the repair and restoration of listed historic assets has been completed and/or until funding has been secured or underwritten for the same.
- That no dwelling should be occupied until the Park has been transferred to Crystal Palace Park Trust.

These obligations should be secured by planning condition and/or a section 106 agreement.

Do you agree?
Questions

1. Do you support the proposals for the conservation and repair of heritage assets?
   Yes / No

2. Do you support the proposals for removal of the existing hard surfaces and the construction of new playgrounds?
   Yes / No

3. Do you support the proposals for landscaping the Park?
   Yes / No

4. Do you support the proposals for demolition of existing structures and the rebuilding of the information centre?
   Yes / No

5. Do you support the proposals for creation of new pedestrian paths/vehicular access roads / car, coach and cycle parking?
   Yes / No

6. Do you support the proposals for change of use of the caravan site to public open space, community centre, parking and housing?
   Yes / No

7. Do you support the proposals for a cultural venue on the top-site?
   Yes / No

8. Do you support the proposals for Capel Manor to occupy two Metropolitan Open Land sites within the Park?
   Yes / No

9. Do you support the proposals for housing sites on the present caravan site and on Crystal Palace Park Road?
   Yes / No

10. Do you agree that legal mechanisms are needed to ensure that housing receipts are invested in the Park, that the regeneration works are carried out, that the Park is transferred to the Trust and that the Trust is properly financed.
    Yes / No
Further reading


Planning statement. This sets out the planning justification: https://crystalpalaceparkregenerationplan.com/wp-content/uploads/2020/03/Planning-Statement.pdf