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Planning Inspector – LB Bromley Local Plan Examination
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By email: bankssolutions@gmail.com

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Dear Ms Hill

London Borough of Bromley Local Plan Examination

Further to our response to the Regulation 19 consultation on the Bromley Local Plan, we would like to add some further detail on the issue of Bromley's Renewal Areas and specifically the policies and text relating to the Crystal Palace area of the borough. There are certain areas of the Plan as it stands that, taken together, would not in our opinion reflect the highly sensitive nature of Crystal Palace Park and may offer the potential for inappropriate development. The Park is a designated conservation area, Metropolitan Open Land and a Grade II* registered park as well as containing a range of listed buildings, including the Grade I listed animal sculptures. As such the range of policies within the draft Local Plan relevant to the Park will need to ensure they offer appropriate guidance to any decisions on future development.

We would stress that we support the broad approach of the Council to growth and development across the Borough and the way the Plan seeks to ensure that this works with and is complementary to the local historic environment. Historic England has worked with LB Bromley and has also been supportive of the ongoing regeneration plan for the park.

Draft policy 15 – Crystal Palace, Penge & Anerley Renewal Area

The use of the word 'maximise' in the introductory text is in our opinion problematic here. To avoid any suggestion that development should seek the largest possible quantum of development, we would instead prefer text that encourages development of a size and design that is appropriate to its context and the historic environment. We recommend that the introductory text is amended to read

Proposals within the Crystal Palace, Penge & Anerley Renewal Area will be expected to *create* opportunities:



Clause b can then be amended to

b – to benefit the wider area by contributing to the conservation and enhancement of Crystal Palace Park through development that respects its character area and ensures a positive relationship with natural and heritage assets.

Draft policies 38(listed buildings), 41 (Conservation Areas) and 45 (Historic Parks and Gardens)

Heritage at Risk – there are a number of designated heritage assets within the Park that are currently on the Heritage at Risk register, including the Conservation Area itself, the subway (which has been on the Register since 1990) and railings at the northern edge and the terraces of the gardens. Amending these policies to make reference to Heritage at Risk would not only better reflect paragraph 126 of the NPPF in terms of addressing heritage assets at risk of decay and neglect, but also offer an explicit mechanism through which the enhancement of the historic environment can be achieved. The following could be added to each of the three:

Development proposals should seek to provide sustainable solutions for assets on the Heritage at Risk register wherever appropriate, in line with policies elsewhere in the Plan.

Neither policy 41 or 45 currently make reference to significance. To ensure consistency with the NPPF (and indeed with draft policy 38 – listed buildings), we recommend that both these policies should include reference to their significance as heritage assets, to ensure that this will be a consideration in any development proposals.

Draft policy 111 – Crystal Palace Strategic Outer London Development Centre

We welcome the Background Paper on this policy and have noted the explanatory text at 6.4.2 that indicates the strengths of the SOLDC are the ‘potential, leisure, tourism, arts, culture and sports functions’. However there remains the potential that the SOLDC designation may raise expectations in terms of development potential of the Park beyond what is appropriate. The sensitive character of the Park is referenced within the explanatory text here, but in order to be realistic in terms of future capacity we believe this should be better reflected in the wording of the policy itself. An addition at the end of the first paragraph will address this:

‘... of the Crystal Palace Park *and the significance of its heritage assets*’.

And to ensure the totality of the historic environment is considered in any decisions, the second paragraph be amended to

‘... guidance related to the Crystal Palace Park Conservation Area, *historic park and listed buildings* and will be’

Finally, para 6.4.14 relates to the Grade II* listed National Sports Centre. We recommend that the word ‘adequate’ be replaced with *appropriate* at line 4 to ensure development respects the significance of the asset.

I trust these comments are helpful. Please do not hesitate to contact me should you require any further information in the meantime.

Yours sincerely



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