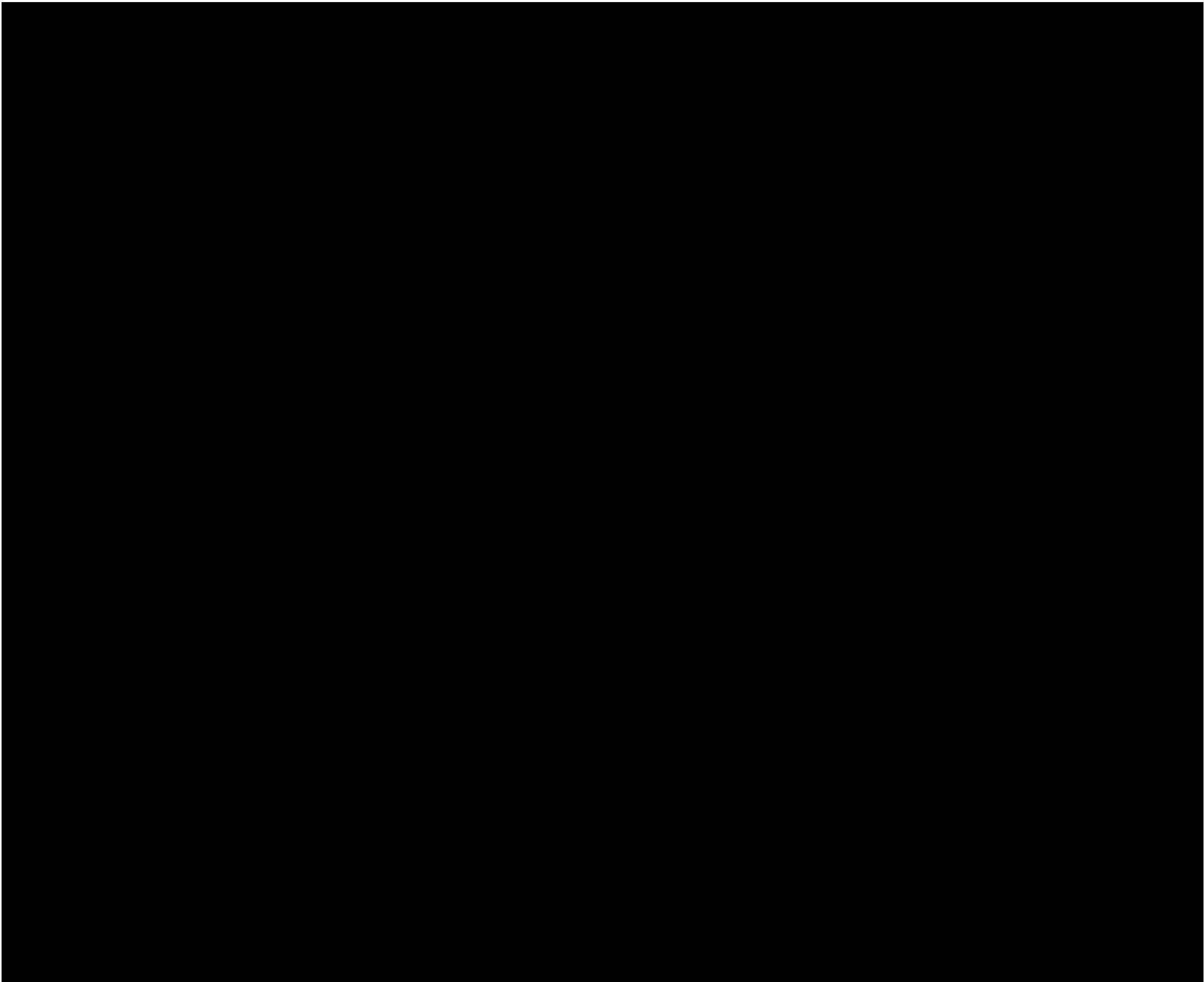


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Appendix A
Initial Built Heritage Appraisal
Crystal Palace National Sports Centre, Crystal Palace Park, London Borough of Bromley

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1. Introduction

Purpose of this report

This Initial Built Heritage Appraisal has been prepared by Turley's specialist built heritage team on behalf of the Greater London Authority (GLA) (our "Client") to provide a summary of the findings of our initial research and site analysis with regard to built heritage matters; as they relate to proposed future use of the Crystal Palace National Sports Centre (NSC) (the "Site"), within Crystal Palace Park and the London Borough of Bromley (LBB). This is the very first stage of our work, which was first issued in July 2018 and will continue to develop through the lifetime of the project and in tandem with the work of the wider multi-disciplinary team; led by Hawkins \ Brown architects, as options for the Site are properly tested. This baseline work was most recently updated in November 2018.

The purpose of this initial report is to establish the key built heritage constraints and opportunities for the future use and development of the Site, which will be used actively as a tool with our professional advice to help guide the design process at this early stage of the project, and through discussion. Our role is to assist the wider team in better understanding and appreciating the heritage significance (and setting) of the Site and its relative sensitivity to future change. In particular in light of the relevant statutory duties of the Planning (Listed Building and Conservation Areas) Act 1990 ("the Act"), which provides the legislative basis for the protection of listed buildings and their settings, and conservation areas, and also in light of the National Planning Policy Framework (NPPF) 2018, which provides the Government's national planning policy on the conservation of the historic environment.¹ Local planning policy and guidance should be in accordance with these legislative and national policy requirements.

Scope and methodology

A preliminary desk study has been undertaken to establish the particular historical, physical and functional components / aspects of the Site and also its wider landscape and townscape surroundings. Both historical and current Ordnance Survey (OS) maps have been utilised to identify these features, supplemented by aerial photography. Our study has included review of the most relevant published information with regard to the historical development of the Site and its architecture and landscape, other key documents such as conservation or management plans, conservation area appraisals etc. prepared for, or by, the GLA, LDA and LBB. Critically we have also identified the

designated and also any non-designated heritage assets within the Site and its vicinity that would likely be affected by future change - first using Historic England's (HE) National Heritage List for England and then the relevant local planning authority (LBB) web resources.

A field study and site inspection was then undertaken by specialist consultants from the Turley Heritage team, during which the visibility was good and access was provided to the main public areas of the National Sports Centre complex. The key features of the Site and surrounding area; and in particular the location and extent of the identified built heritage assets and their settings, were confirmed and explored. This study involved travelling throughout the study area and producing a working photographic record. Our analysis of the particular heritage significance and sensitivity, and also any contribution of the settings, of the identified heritage assets has been informed by both desktop and field study. It is on this basis that the potential for alternative future uses and development of the Site to impact these heritage assets either directly or indirectly, and their significance, will be assessed as the project and design process progresses.

Structure of this report

Section 2 of this report summarises the initial findings of our survey work. This most importantly identifies the existing heritage assets within the Site and our wider study area, which have the potential to be affected directly or indirectly by changing future use and development here. This is supported by a Heritage Assets Plan figure for the park and Site; at Appendix 1. This is followed by further analysis of the particular heritage significance of the heritage assets, how this relates and interacts within a wider and related ensemble of historic built and landscape features, and also the contribution of setting. Such analysis will evolve further through the lifetime of the project, and design development.

Section 3 uses our initial analysis to set out a high level review of the key built heritage considerations for the future use and development of the Site. In particular this comprises the potential impacts of the proposed development of the Site on the significance (and setting) of built heritage assets, and also the broader historic environment, as defined by the NPPF. This has also been considered, as required, in light of the relevant statutory duties of the Act, national policy in the NPPF and supported by NPPG, and local planning policy and guidance for development within the historic environment. This review is intended to feed into wider assessment of the development opportunities and constraints of the Site being undertaken by the wider team for each relevant discipline.

For reference and completeness the relevant legislation, national and local planning policy and guidance, related to built heritage matters is set out in full in Appendix 2 to this report.

¹ MHCLG, National Planning Policy Framework (NPPF) 2018 - Paragraph 189

2. Built Heritage Assets and Significance

Introduction

The Crystal Palace National Sports Centre, within Crystal Palace Park, has a complex history, which in more recent decades has included a number of ambitious development schemes and visions for the future use of the park and the centre. It is acknowledged by the GLA that a deliverable strategy is urgently required to secure the future use of the Site and its buildings and landscape features. It has also been recognised that the Site holds heritage significance that is of particular importance both nationally and locally, and also that this significance has been, and can be, interpreted and valued in different ways by different stakeholders. Ensuring that the significance of the various overlapping and inter-related heritage assets within the Site can be sustained, whilst securing a viable use in the interests of their future conservation, is a key objective for any proposal.

Crystal Palace Park was created as a designed landscape setting for the relocated and re-erected Crystal Palace of the 1851 Great Exhibition. Sir Joseph Paxton was assisted in this design by Edward Milner to provide an appropriate setting for his famed building, and also to provide a wider cultural, sporting and recreational amenity for an expanding suburban South London. The park opening initially in 1854. A huge fire destroyed the Crystal Palace in 1936 and what immediately followed was a rapid decline in the fortunes of the park. The park transferred to the London County Council (LCC) in 1952 to re-open in part as a public amenity. With the dramatic decline of the Crystal Palace itself the completion of the pioneering National Recreation (Sports) Centre (NSC) in 1964 this become the new focus for this landscape.

To establish an appropriate baseline of understanding and appreciation of the heritage significance and sensitivity of the Site and NSC, our initial analysis work has included a review of key published sources; including conservation related documents prepared by others to inform potential future uses, focussed archival research; including historical map regression, and on-site visual inspection of key buildings and landscape features. In summary, key documents include:

- Crystal Palace Park Conservation Area Appraisal SPG (LBB 2002);

- Restoring the Vision - Crystal Palace Park (LBB undated)
- Crystal Palace Park Conservation Plan (Prince Research Consultants Ltd Nov 2004);
- Crystal Palace Park Cultural Heritage Assessment (MoLAS 2004);
- Crystal Palace Park Management and Maintenance Plan (LBB 2004);
- Crystal Palace Park Conservation Management Plan (Sarah Couch Historic Landscapes Ltd 2007);
- Crystal Palace Park Masterplan – Management and Maintenance Plan (LDA 2007).

Together these documents have built up a detailed description of the historical development of the park as a whole and also its heritage significance (including the NSC Site). It is not the intention to repeat or reinterpret this description in this initial report, but to draw from past analysis where relevant and appropriate in providing our ongoing advice on built heritage matters.

Reference has also been had to the published List / Register Entries for the listed buildings and registered park and garden within the Site and wider park, which are provided by Historic England through their online mapping tool The National Heritage List for England.

Other sources of primary and secondary information has also been sought as part of our initial analysis stage, including from the following resources:

- Royal Institute of British Architects (RIBA) Architecture Library (primarily architectural and construction journal articles, historical photographs etc. in relation to the NSC);
- City of London, London Metropolitan Archives (LMA) (primarily architectural drawings in relation to the design and construction of the NSC).

Heritage Assets

Definition and scoping

The NPPF defines a heritage asset as:

“A building, monument, site, place, area or landscape identified as having a degree of significance meriting

consideration in planning decisions, because of its heritage interest.”²

Designated heritage assets are those which possess a level of heritage interest that justifies designation and are then subject to particular procedures in planning decisions that involve them. These assets include listed buildings, conservation areas and registered parks and gardens. The NPPF also identifies that heritage assets include both designated heritage assets and assets identified by the local planning authority (principally including local listing).

The Site incorporates, or falls within the area, of a number of different heritage assets; the significance of which has the potential to be impacted by further change in use or physical alteration of buildings and landscape directly and or indirectly. There are also a further number of heritage assets outside the Site area, within the wider park and also the surrounding suburban townscape, which may have the potential to be impacted indirectly by proposals through change to the experience of part of their settings and also some shared views. Our more focussed study area – defined for the purposes of this initial stage of analysis – is used to identify those assets with the greatest potential to be affected by emerging proposals, which are also confined to the area of the park.

In overview, an extract of the interactive mapping tool used by LBB is included below (Figure 2.1) to map the heritage assets within the Site, park and wider townscape. As legend, bold red (which yellow surround) indicates the location and assumed extent of listed buildings, red hatch indicates the boundary of conservation areas, and bold blue (with yellow surround) indicates the location and extent of locally listed buildings.

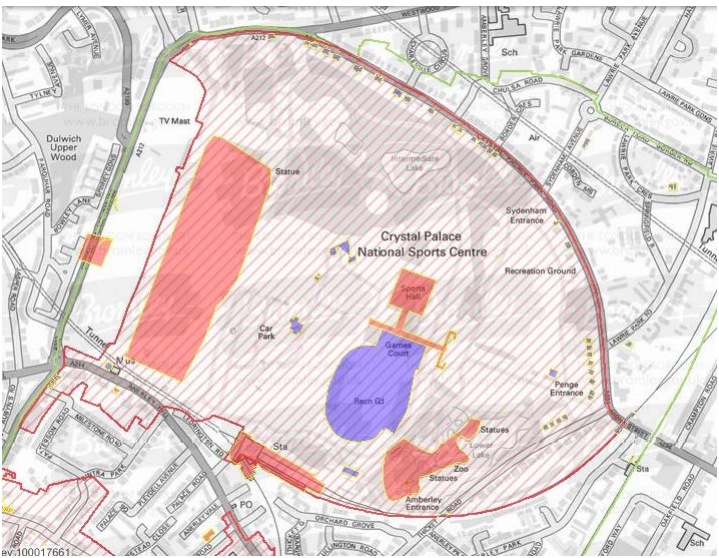


Figure 1.1: Heritage Asset Map (LBB)

² MHCLG, National Planning Policy Framework (NPPF) 2018 - Annex 2: Glossary

It should be noted that this mapping tool does not include information on designated registered parks and gardens. The designated boundary and also Register Entry for Crystal Palace Park is provided by Historic England through their online mapping tool The National Heritage List for England. It should also be noted that heritage assets to the north and west of Crystal Palace Park, which fall outside the boundary of the LBB, are not indicated on this map. Refer to our Heritage Assets Plan figure for the park and Site; at **Appendix 1**.

Significance and setting

The NPPF defines the significance of a heritage asset as:

*“The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.”*³

Further guidance is provided by the Government (DCMS) and Historic England with regard to understanding and appreciating heritage significance, and also how that can be articulated, for each different heritage asset type. Reference is made to this guidance for each heritage asset type in the sections below.

The setting of a heritage asset is also defined by the NPPF to comprise:

*“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”*⁴

Historic England has also published guidance⁵ in respect of the setting of heritage assets and related views, providing detail on understanding these and the associated assessment of the indirect impact of any changes on heritage significance. This presents a series of attributes of a setting which can be used to help assess its contribution to the significance of a heritage asset. These can comprise

the asset’s physical surroundings; the experience of the asset; and the asset’s associative attributes.

Designated Heritage Assets

Listed Buildings

HE’s National Heritage List for England is the relied source for mapping statutorily listed buildings across all local planning authority areas. The listed buildings that have been scoped within our study area relating to the future use and development of the Site are set out at Table 2.1 below. This includes a review of the nature of the potential impact of proposed change within the Site on the significance of these heritage assets (final column).

Table 2.1 Listed Buildings

Name / Address	Grade	Potential Impact
Crystal Palace National Recreation (Sports) Centre	II*	Direct and indirect
Bust of Sir Joseph Paxton	II	Indirect
Royal Naval Volunteer Reserve Trophy (War Memorial)	II	Indirect
Gorilla Sculpture	II	Indirect
Prehistoric Animal Sculptures with associated Geological Strata including Lead Mine, Lower Lake	I	Indirect
Crystal Place Lower Level Station	II	Indirect
Upper and Lower Terrace of Crystal Palace Gardens	II	Indirect

The extent of the listing designation of a building is determined by the local planning authority and their interpretation of the Act, and relevant case law, in relation to listed buildings. It should be noted therefore that the listing designation of the NSC (for the purposes of listed building control) may not only extend to the “principal” building; both externally and internally, but could also include any object or structure fixed to that building, as well as other related

buildings or structures that fall within the defined curtilage. For example, the LBB online mapping tool has specifically identifies that the attached approach ramp to the NSC, which traverses the central axis of the park at this point and also provided high level access, would be considered to form part of the principal listed building for the purposes of planning control (also refer to **Figure 2.1**).

Listed buildings are defined as designated heritage assets that hold special architectural or historic interest. The principles of selection for listed buildings are published by the Department of Culture Media and Sport⁶ and supported by Historic England’s Listing Selection Guides for each building type⁷. Primarily for identification purposes List Entries have been published by Historic England for each listed building, and these are provided online through The National Heritage List for England.

The NSC is located that the very centre of the Site and is the architectural focus and nodal point for the wider multi-sports complex that was developed in the post war period within this part of the park. This heritage asset is listed at the higher grade II*, which recognises the smaller number of key buildings on the register that have “more than special interest” in the national context. The description within the published List Entry for the NSC (formerly known as the National Recreation Centre) is set out in full below for reference:

“Sports Centre. Designed 1953-4, built 1960-4 by the LCC Architect's Department under Leslie Martin and (from 1957) Hubert Bennett; Norman Engleback (until 1960) and E R Hayes Group Leaders; B G Jones and M J Attenborough assistant designers; Sir Gerald Barry, consultant. Reinforced concrete frame, exposed externally and largely infilled with glass at upper levels, some brick below. Complex but logical plan with central 'A'-frame supporting spectator seating and reinforced concrete roof, to either side respectively baths and principal arena on two upper levels. Lower floor has squash, smaller halls, boxing booths (formerly indoor cricket facilities), changing areas and boilers. Main halls fully glazed at upper level, the ends a predominantly vertical composition of regular mullions with two thin transoms. The slightly longer side elevations more expressive, a tripartite thirteen-bay composition with thick horizontal

transoms. Oversailing roof whose underside is lined in teak inside and out; the side elevations with double 'M' lozenge pattern. Entrance for participants at lowest level, with double doors (renewed); spectators enter at upper level from long raised terrace that is the principal axis of the park. Virtually detached small pool is not of special interest.

The interiors seen by spectators are of particular interest. Pool hall with central 165', eight-line racing pool; diving pool with dramatic reinforced concrete diving board (now rare) at north end; learner pool to south; the whole is the length of the building and is tiled at lower level. To one side a bank of seating (actual seats renewed) gives on to central concourse on two levels linked by stairs and corresponding bank serving smaller arena on other side. The views across this concourse and seating, and down into squash areas, are particularly impressive. Their fluidity is enhanced by the bold expression of the 'A'-frame and delicate arched bracing supporting the roof which is a most distinctive and distinguished feature.

In 1951 the LCC took over the derelict site of the old exhibitions centre from the Crystal Palace Trust. Sir Gerald Barry, director of the Festival of Britain, was commissioned to advise on the best use of the land. His proposed new exhibition centre was not adopted, but the LCC did take up his idea of using the drained lake area in the middle of the gardens as a centre for recreational sports and training, with some residential facilities.

Emphasis was given to swimming as Southern England did not have an Olympic-sized pool. It was the first indoor multi-functional hall designed in Britain (though not the first to be built) at a time when such facilities did not exist elsewhere in Europe. Crystal Palace is exceptional in the breadth of its vision, not only in the range of facilities carefully planned within it but also in being intended to serve serious performers from all nations (there is separate residential accommodation in the park) as well as local enthusiasts.”

Further description of the historical development of this site and criticism of the engineering and architecture of the

³ MHCLG, NPPF 2018 – Annex 2: Glossary

⁴ MHCLG, NPPF 2018 – Annex 2: Glossary

⁵ Historic England, Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets, 2017 (2nd Ed.)

⁶ DCMS, Circular: Principles of Selection for Listing Buildings, 2010

⁷ Historic England, Listing Selection Guides: (suite of documents for each Building Type), 2011 and updated since 2017

building is provided in numerous published sources. These include the celebrated Buildings of England (Pevsner) series (London 2: South 1983), Great Lengths - The Historic Indoor Swimming Pools of Britain (Historic England 2009), and also national architectural and construction journals dating from the period of the original design and then later completion of the NSC.

The significance of this heritage asset and the existing building derives from both its special architectural interest and also historic interest in the national context, as well as from “group value” (as highlighted in the List Entry) as seen and used as the centrepiece of a larger ensemble of related buildings, structures and landscape features that together form this large multi-sports complex. The significance of these other elements of the complex and also within its immediate setting relative to the principal listed building is variable however; where some contemporary elements may enrich the experience of the building and its history, other later interventions may indeed detract or compete.



Figure 1.2: Aerial Photograph of NSC dated 1965

The historic interest of the listed building is drawn from a number of achievements or associations of its past development and use, and also importantly in its continued use for combined sports (now at a more local level). These include:

- Pioneering as first designed (but not first built) combined swimming and sports building and complex on a large scale, and publicly funded to serve a national need in the post war period. It has also proved influential in the approach to later multi-use centres;
- Direct association with the LCC Architect’s Department, then under the celebrated designed Leslie Martin;

- Key venue in the past hosting nationally (even internationally) important swimming events;
- Connection through its use with an earlier history of a wider range of different sports and their events and achievements on the site and in the wider park, of national importance.

The original architectural design of the principal listed building remains clearly legible today in both its external appearance and also the key public spaces internally. Its architectural interest is best represented externally in the intact and distinctively expressed geometric reinforced concrete frame of this box, which is highly glazed and with oversailing and gently zigzagging roof form. The differentiation of lower and upper entrance levels (originally the former for competitors and latter for spectators) is also legible, in particular through its relationship with the approach ramp to the south.

The List Entry describes the plan form of the centre as “complex but logical”. The section is particularly distinctive, even structurally and spatially dramatic, where this appreciates the central A frame acting as the north south concourses through the building, and supporting the roof structure to create generously proportioned spaces within. The upper concourse divides the swimming and diving pools and main indoor arena to each half of the building. Other architectural features that add to this drama, and or appreciation of the original design intention, could include the cantilevered seating, multi-level diving board and surviving original details such as the pool observation windows, teak slatted roof and original timing system and control cabin. The List Entry states that “the interiors seen by spectators are of particular interest”, which also supports our assessment that these main public spaces make a greater contribution to the significance of the listed building relative to the other ancillary or secondary spaces at lower level and accessed from the lower concourse.

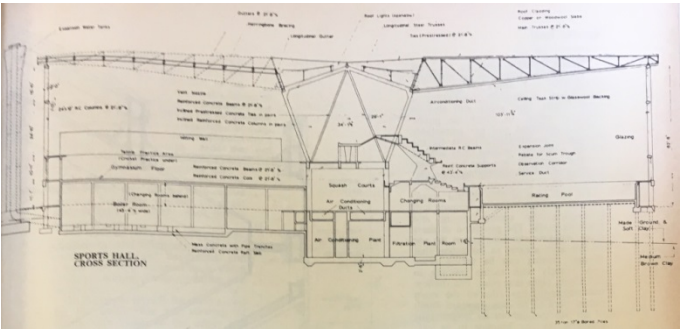


Figure 1.3: Typical Section Drawing (LCC Architect’s Department) dated 1964

The fitness for purpose of the original building is an issue that has been highlighted in a number of past publications and studies, which does relate to a degree to any assessment of the specialness of the architectural interest of the listed building. For example, the combination of wet and dry uses in one building, and complexity of services installation, was pioneering at the time but has contributed to the difficulty and expense of ongoing maintenance.

The central NSC building is connected to, or adjoins, a number of other buildings, structures and spaces, which also form part of its immediate setting and how it is experienced in views from within the surrounding park. The approach ramp aligns with Paxton’s original central access, but breaks the direct flow of pedestrians and also local views east and west within this part of the park. It forms part of the original design of the listed building and also determined how the building was used and related to its landscape setting in approach and views. It also provides an integrated connection to the athletics stadium to the south. It contributes to the understanding and appreciation of the significance of the NSC in this way. The ramp also forms part of a more extensive and multi-level circulation around and accessing the building as originally intended.

Other sports buildings or designed spaces have been introduced within the immediate setting of the listed building over time. The List Entry description specifically identifies that the later added swimming hall from 1975, to the south east of the NSC, is “not of special interest”, and so also in our assessment of only limited if any heritage significance. By infilling part of the originally open space between the sports hall and the ramp on its upper level entrance approach, this later undermines to a degree the experience of the original principal building in its wider setting. Other more recent interventions, such as the inflatable sports pitch to the north of the principal building is of no special interest, and indeed detracts from the appreciation of the original

architecture and presence of the building in some local views.

The other listed building within our defined study area are each designated at grade II (with the exception of the recently restored Prehistoric Animal Sculptures with associated Geological Strata including Lead Mine within the area of the Lower Lake and original scheme by Paxton, which are listed at the highest grade I to recognise “exceptional interest”). The buildings and features that comprise the commemorative bust, war memorial, lake side sculptures, railway station and remaining parts of the terraces of the now lost Crystal Palace surround the Site and each relate to the earlier phase in the history of the public park and its original vision promoted by Paxton. The NSC was a later and bold intervention to this landscape, but also built on an earlier established sports and recreation heritage. These listed building al share a landscape setting and related historical context. The lake side Gorilla Sculpture to the south east of the Site is contemporary with the NSC, is a special example of modern art but a recognised artist, but was originally intended for London Zoo.

Conservation Areas

The relevant local planning authority web resources each identify the location and extent of the boundaries of conservation areas within their authority area. The conservation areas that have been scoped within the initial study area, and which encompasses the Site; the significance of which would be affected by future change, are set out in Table 2.2 below.

Table 2.2: Conservation Area

Name	Designation Date	Potential Impact
Crystal Palace Park	1989	Direct

Conservation areas are designated on the basis of their special architectural or historic interest, the character and appearance of which it is desirable to preserve or enhance. Historic England has published guidance in respect of conservation areas⁸ and this provides a framework for the appraisal and assessment of the special interest and significance of a conservation area.

LBB has prepared a SPG document for the Crystal Palace Park Conservation Area (published 2002), which provides a

⁸ Historic England, Advice Note 1: Conservation Area Designation, Appraisal and Management, 2016

description of the historical development of this wider area beyond the Site, its defining character and appearance, and some guidance on the preservation and or enhance of its special interest. In relation to the Site and the NSC within the park, this document describes this sub-area’s character and appearance as:

“The National Sports Centre now occupies much of the core of the park largely enclosed by the disused motor racing circuit. The area forms an enclave within which the original landscape character of the Park has been completely transformed: it is now a self-contained post-war development in the modern style. It should be noted that this enclave contains some individual buildings of some architectural merit notably, a reinforced concrete and glass indoor sports arena and swimming pool complex by the LCC Architect’s Department.

The main stadium and the associated Jubilee stand constructed in 1977 are also of some architectural interest. However, the effect of the construction of the centre has been to impinge upon views within the Park, most particularly from the former Palace site. As the centre and the motor racing circuit overlapped the grand east-west axis of the park, a concrete elevated walkway was constructed to convey pedestrians through the complex, connecting the Palace site with the remaining parkland. Utilitarian in aspect and unloved by many, this walkway is nevertheless an example of modern movement architecture at its most pure and uncompromising: it makes no concessions to its surroundings and few to Paxton’s original landscape plan.

In contrast to the individual quality of some of the buildings, much of the small-scale detail of the sports centre has no redeeming merit. It does not complement either the 20th century buildings within it or the surrounding 19th century park. The addition of fences, walls, compounds, roads and footways, together with the unresolved nature of the disused motor racing circuit all produce a cluttered aspect that does not add to the visual amenity or historical or architectural interest of the conservation area as a whole.”

This document (from 2002) also includes a Guidance Statement for the NSC and its future use and potential redevelopment at that time.

Registered Parks and Gardens
HE’s National Heritage List for England has also been used to map registered parks and gardens of historic interest within the initial study area; the boundary of which is provided by Historic England through their online mapping tool The National Heritage List for England. The registered park and garden that encompasses the Site; the significance of which would be affected by future change, is set out in **Table 2.3** below.

Table 2.3: Registered Park and Garden

Name	Designation Date	Grade	Potential Impact
Crystal Palace Park	1 October 1987	II*	Direct

Inclusion on the register of parks and gardens does not confer any additional statutory protection. It is however, it is a material consideration in the determination of planning applications. The register identifies designed landscapes which are considered to meet published criteria and possess special historic interest, which is supported by Historic England’s Registered Parks and Gardens Selection Guides for each landscape type⁹.

A Register Entry has been published by Historic England for this historic landscape area, and this is provided online through The National Heritage List for England. In summary, the Register Entry describes this heritage asset as:

“C19 pleasure grounds designed by Sir Joseph Paxton as a setting for the Crystal Palace when it was moved from Hyde Park in 1852.”

This heritage asset is registered at the higher grade II* which indicates “more than special interest” in the national context. The significance, and historic interest, of the asset derives from the record it provides - through existing built and designed landscape features (as well as continued recreational and sports use) – of Paxton’s original and pioneering vision and design for a public park and cultural amenities, and also later architecture and landscape design

relating primarily to the development of the park as a nationally important centre for sports.

Within the Site the NSC is a 20th century intervention into the historic park. With the decline and destruction of the Crystal Palace at its western end, this large scale modern sports complex has emerged as the new focus of activity and architectural presence within what is a multi-layered and evolved landscape. The Register Entry also sets out that:

“Since the destruction by fire of the Crystal Palace, the focal point of the park has transferred to the National Recreation Centre (listed grade II). In 1951 Sir Gerald Barry, Director of the 1951 Festival of Britain, was commissioned to advise on the best use of the land recently taken over by the LCC. His proposal of a new exhibition centre was not adopted but the LCC did take up his idea of using the area in the centre of the former race track for recreational sports and training. The Sports Centre was designed in 1953-4 and built between 1960 and 1964 by the LCC Architects Department (Architects J 1967). The reinforced concrete frame, exposed externally and largely infilled with glass at the upper level, houses sports halls and swimming baths. Entrance for participants is at the lower level, while spectators enter at the upper level from the long raised terrace which is on the line of the principal axis of the park.”*

Non-Designated Heritage Assets
Locally Listed Buildings
LBB maintains a register of unlisted buildings of local architectural or historic interest or “local list”, which are considered to be non-designated heritage assets for the purposes of the NPPF. These are mapped by the relevant local authority web resource. The locally listed buildings that have been scoped as part of our initial analysis are those within the Site or its immediate vicinity, and set out at **Table 2.4** below.

Table 2.4: Locally Listed Buildings

Name / Address	Local Ref No.	Potential Impact
Athletics Stadium (Jubilee)	818	Direct and indirect
The Lodge Tower (NSC)	9999	Direct and indirect
Caretakers Lodge	9999	Direct and indirect
Staff Houses	9999	Direct and indirect
Fountain Basin (City Farm)	9999	Direct and indirect

It should also be noted that it is within the gift of the local planning authority to identify other buildings or designed landscape features on Site or within its surroundings as non-designated heritage assets; through any plan or other guidance making processes or during any pre-application or application stage for the scheme. This possible future change of the constraints of the Site would have to be monitored in liaison with the key stakeholder accordingly.

Detailed guidance on the identification of buildings and structures of local heritage value has been published by Historic England. This guidance identifies local heritage listing as “... a means for a community and a local authority to jointly identify heritage assets that are valued as distinctive elements of the local historic environment. It provides clarity on the location of assets and what it is about them that is significant, guaranteeing that strategic local planning properly takes account of the desirability of their conservation.”¹⁰

The significance of these heritage assets derives from their local historic and architectural interest in representing different phases in the development and use of this part of the park. The large modern structures of the Athletics Stadium (main stand and 1977 Jubilee stand) have some local architectural distinction and but perhaps greater significance historically as the site of nationally important sporting events (including former use as a football ground). Together with distinctively post war The Lodge Tower (former competitors hostel), Caretakers Lodge and Staff Houses, these buildings share group value as part of a much wider modern multi-sports complex and supporting facilities - centred on the statutorily listed NSC. The City Farm represents a further amenity later introduced to the park, and has particular local interest historically

⁹ Historic England, Registered Parks and Gardens Selection Guides: (refer to guide on Landscapes of Remembrance), 2012 and updated

¹⁰ Historic England. Advice Note 7: Local Heritage Listing. 2016

incorporating one of the fountain basins from Paxton's original landscape and waterscape scheme.

Wider overview

This initial analysis of the Site and its wider surroundings reveals that the story is complex in terms of the various and different heritage asset designations and other identifications that fall within or across the NSC and also define its or each others immediate and wider settings. There is a further complexity in how these heritage assets overlay and also interact; reinforce as a group or even compete, with one another, when we are looking to narrate, understand and appreciate their heritage significance. Various historical, functional and or visual inter-relationships exist across the park.

For example, the heritage significance of the modern sports hall of the NSC is emphasised by its statutory designation and protection as a listed building at the higher grade II*, i.e. as being of “more than special interest” at the national level. But this building and the wider area of the Site and park holds different and or additional values to the local community, in terms of how it has been and continues to be used for sports and recreation. Another example of how the heritage significance of the Site can be interpreted in different ways relates to the overlay of the modern sports complex within an older parkland landscape that was originally designed around a different focal feature or node (i.e. the now lost Crystal Palace). The approach ramp to the NSC is an integral feature of the original post war design of this listed building and therefore contributes to some degree to its significance; also addition a further layer of interest to the park as a whole. However, its form and level directly intervenes in the central axis and intended vista of the earlier park design led by Paxton, which could be seen to conversely detract from aspects of the experience of the heritage significance of this historic landscape.

Accordingly there is a hierarchy of heritage assets and related planning controls and considerations which each must be addressed as part of the future use and development of the Site (this is discussed further in **Section 3**).

3. Review of Built Heritage Asset Considerations

Legislative and policy context

Principally, the relevant built heritage legislation, policy and guidance context for consideration of proposed development on this Site is set out in full at Appendix 2. This includes:

- the statutory duties of the Planning (Listed Buildings & Conservation Areas) Act 1990 including; the requirement to have special regard to the desirability of preserving the special interest of a listed building and any elements of setting which contributes positively to this special interest;
- and also the requirement under the Act to give special attention to the desirability of preserving or enhancing the character or appearance of a conservation area;
- national policy set out in the NPPF 2018 (and supported by NPPG), with regard to the conservation of both designated and non-designated heritage assets; and the presumption to sustain, where appropriate enhance, their significance (including any positive elements of setting); and
- local policy for development within the historic environment, and other relevant material considerations, principally GLA and LBB authority areas (London Plan 2016 and Unitary Development Plan 2006).

Specifically, the NPPF (paragraphs 189-190) requires applicants for development to provide a description of the significance (and any contribution of setting) of affected heritage assets, and then for local planning authorities take their assessment of this into account when considering the impact of proposals; in order to avoid or minimise conflict between the conservation of heritage assets and any aspect of the scheme. At application stage the assessment of heritage significance (and setting), and also the built heritage impacts of a development scheme, would normally be undertaken as part of a Heritage Statement, which would also accompany any built heritage chapter with an Environmental Statement (ES) should the scheme meet EIA requirements.

Where a development proposal is considered to cause “harm” to a designated heritage asset, this would require clear and convincing justification (paragraphs 193-194). This should be treated as either substantial harm under

paragraph 195 or less than substantial harm under paragraph 196, as appropriate taking into account the relative significance of the asset affected and the nature and extent of impacts on this. Determining the degree of harm is a judgement, and NPPG establishes that “substantial harm” is a high test and would not occur in many cases. Where a development proposal would lead to “less than substantial harm”; such a degree of harm should be weighed against the wider “public benefits” (including “heritage benefits”) of the development proposal as a whole; albeit in the strong light of the overarching statutory duties of the Act.

The effect of a proposal on the significance of a non-designated heritage asset is also a material planning consideration (paragraph 197). In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Local planning authorities are also encouraged to look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of a heritage asset should be treated favourably (paragraphs 200-201). Such enhancement of significance would be regarded as a heritage (and public) benefit.

Heritage considerations

Our identification of the high level built heritage constraints and opportunities for the future use and development of the NSC Site, in light of heritage legislation and policy, highlights the value and importance of early engagement not only with local stakeholders with an interest in the park, but also with the GLA and LBB design and conservation teams and Historic England (HE) at an early stage. Other stakeholders (national amenity societies and also statutory consultees to applications) to be considered as part of engagement; with a particular interest in the heritage of this Site, would include the Garden History Society, the Victorian Society and the Twentieth Century Society.

Direct heritage impacts

It has been identified that there are a number of designated and non-designated heritage assets within the Site; the significance of which has the potential to be impacted directly as a result of any change of use and or physical alteration to existing buildings, structures or landscape features within its boundary. These heritage assets are set out in **Table 3.1** below.

Table 3.1: Locally Listed Buildings

Name / Address	Asset Type
Crystal Palace National Recreation (Sports) Centre	Listed Building
Crystal Palace Park	Conservation Area
Crystal Palace Park	Registered Park and Garden
Athletics Stadium (Jubilee)	Locally Listed Building
The Lodge Tower (NSC)	Locally Listed Building
Caretakers Lodge	Locally Listed Building
Staff Houses	Locally Listed Building
Fountain Basin (City Farm)	Locally Listed Building

Given the nature and extent of the Site, and its inclusion of a number of different heritage assets, there is also the potential for proposed change within one part of the Site to impact the significance of a heritage asset within this boundary indirectly and through change to an element of its setting and or shared local views (also refer to section below on other potential indirect built heritage impacts).

At this stage the design process has just begun, and it is intended that the analysis of different options for the future of the NSC Site would explore widely within the context of other planning and also wider considerations. Given the openness of the brief in design terms, we identify that there could be the potential for harm to be caused to the significance of any or all of the heritage assets on Site through change; such as total or part demolition of an asset, and or compromising an identified positive historic element or aspect of the use, architecture or setting of an asset.

It would be part of our role to assist in articulating the nature and extent of any such harm to the significance of heritage assets; in light of their relative importance, identified particular heritage significance and sensitivity, as part of consideration of the wider planning case for securing a viable future use and development on Site. Also in through dialogue with key stakeholders. National policy and guidance emphasises the need to minimise harm to heritage significance, but where it is unavoidable to ensure that is capable of being demonstrated, in planning terms that there is “clear and convincing justification”. It would also be preferable to ensure that the level of any heritage harm be kept within scale of “less than substantial” as defined by national policy, to enable the opportunity to make a case

that sufficient “public benefits” would accrue from the proposals overall to outweigh any such harm.

Conversely, and also in line with best practice guidance provided by Historic England, the design process should also consider potential opportunities to enhance or better reveal the significance of the heritage assets through the proposed new use or development on the Site, or as a result of the scheme implementation. These could be considered to be “heritage benefits” (and also “public benefits”) in planning terms. One such heritage benefit that should be at the heart of any scheme proposals would be the securing of a viable use for the NSC and centrepiece listed building that would ensure the conservation of this heritage asset in the long term. Historic England guidance on heritage asset setting and views also sets out that enhancement may be achieved by actions including:

- removing or re-modelling an intrusive building or feature;
- replacement of a detrimental feature by a new and more harmonious one;
- restoring or revealing a lost historic feature or view;
- introducing a wholly new feature that adds to the public appreciation of the asset;
- introducing new views (including glimpses or better framed views) that add to the public experience of the asset; or
- improving public access to, or interpretation of, the asset including its setting.

Related to this, consideration should be given to ways in which the proposed design could incorporate, celebrate or otherwise be informed by the sporting history, associations and wider heritage of the Site and park. Such a considered response to context would constitute good design, which could also be regarded as a public benefit in planning terms.

Again, consideration of any potential heritage benefits, and also the wider public benefits, that proposals for the Site could offer could become particularly important should the local planning authority identify that proposed development on Site could result in harm to heritage significance. Best practice guidance from Historic England encourages applicants to demonstrate how efforts have been made to avoid or minimise harm, and also to maximise enhancement or benefits. This would also feed into the final determination of the overall planning balance when the local planning authority may be seeking to weigh any perceived heritage

harm against the wider public benefits that a scheme could offer (albeit in light of the relevant statutory duties).

It should also be recognised that not all parts of a heritage asset or its setting would necessarily contribute to its significance. Heritage assets may also have different sensitivities to change relative to their particular significance. Therefore aspects of future design proposals may be able to be achieved without affecting heritage significance either negatively or positively. Our advice again would be used to identify and articulate such impacts.

Indirect heritage impacts - setting

The NSC Site falls within the larger heritage asset designations of a conservation area and registered park and garden which are intended to protect the significance of the historic Crystal Palace Park. The Site may also be considered to fall within to local and wider setting of a number of other heritage assets. It is our assessment therefore that proposed new uses and development on Site has the additional potential to affect the significance of these other assets within the wider landscape of the park. Such impacts would be indirect only through change to the character and appearance of part of the setting of these heritage assets and or some shared views. These other heritage assets are set out in **Table 3.2** below.

Table 3.2: Heritage Assets – additional potential indirect (setting) impacts

Name / Address	Asset Type
Bust of Sir Joseph Paxton	Listed Building
Royal Naval Volunteer Reserve Trophy (War Memorial)	Listed Building
Gorilla Sculpture	Listed Building
Prehistoric Animal Sculptures with associated Geological Strata including Lead Mine, Lower Lake	Listed Building
Crystal Place Lower Level Station	Listed Building
Upper and Lower Terrace of Crystal Palace Gardens	Listed Building

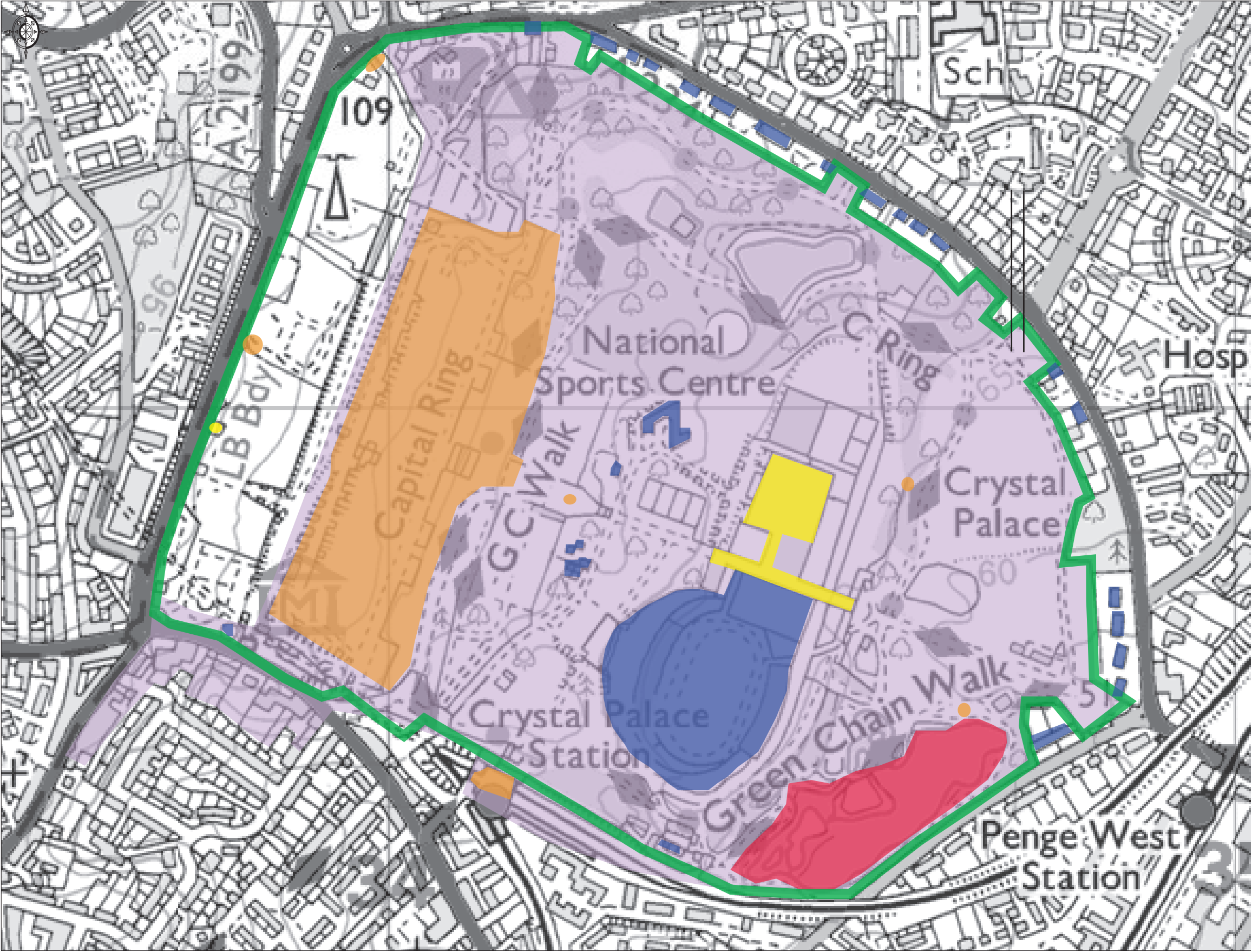
Historic England guidance on this issue sets out that the contribution of setting to the significance of a heritage asset is often expressed by reference to views. However, assessing how development can affect heritage significance

is not purely a visual consideration, but should also consider other aspects such as any impact on historical relationships between assets and within the townscape, patterns of use or access, noise through activity etc. As the design process evolves, key considerations for indirect heritage impacts and change to the setting of heritage assets (which could be positive, neutral or negative in their effect on significance) could include:

- Impact of new use and development on the setting of the listed building NSC, in particular how the building was originally intended to sit within and interact with the surrounding landscape, including its relationship functionally and or visually with closed related heritage assets such as the locally listed stadium, purpose-built housing and other post war elements / features still existing;
- Impact of proposed change on the understanding and appreciation of the significance of the original designed landscape of the 19th century Crystal Palace Park (both conservation area and registered park and garden designations). Including the character and appearance of the wider setting of historic park elements / features (including both listed buildings and locally listed buildings) such as:
 - the highly contained lake side setting of the animal and geological sculptures to the south east of the Site;
 - views to and from the prominent feature of the bust of Sir Joseph Paxton to the west and also war memorial within the lower recreation ground to the east;
 - approaches and also views to and from the railway station (lower level) at the southern edge of the park;
 - wider views and vistas from the higher ground of the former terraces of the gardens of the Crystal Palace looking south east across the Site and beyond the boundaries of the park;
 - vistas and key pedestrian route aligned north west south east along the central axis of the park and through the NSC.
- Any other potential impact on the significance of other designated and or non-designated heritage assets beyond our defined study area and the park

boundaries. To be further analysed as the scheme design evolves and is tested.

Appendix 1: Heritage Assets Plan



- Grade I Listed Building
- Grade II* Listed Building
- Grade II* Registered Park and Garden
- Grade II Listed Building
- Locally Listed Building
- Conservation Area

CLIENT:
Hawkins Brown

PROJECT:
Crystal Palace Sports Centre

DRAWING:
Heritage Assets Map

PROJECT NUMBER:
BOWL3003

DRAWING NUMBER: 01
CHECKED BY: RB

REVISION: 00
STATUS: Final

DATE: August 2018
SCALE: NTS

Appendix 2: Heritage Legislation, Policy and Guidance

Statutory Duties
The Planning (Listed Buildings and Conservation Areas) Act 1990

The Planning (Listed Buildings and Conservation Areas) Act 1990 provides that listed building consent is required for:

“(s.7) ... any works for the demolition of a listed building or for its alteration or extension in any manner which would affect its character as a building of special architectural or historic interest ...”

In determining such applications the following duty is placed upon the decision maker:

“s.16(2) In considering whether to grant listed building consent for any works the local planning authority, or as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”

Section 66 of the Act imposes a general duty as respects listed buildings in the exercise of planning functions. Subsection (1) provides that:

“In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”

With regard to applications for planning permission within conservation areas, the Act outlines in Section 72(1) that:

“In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”

Thus the statutory provision is satisfied if the development does one thing or the other, and there will be cases where proposals will both preserve and enhance a conservation area. The meaning of preservation in this context is taken to be the avoidance of harm. Character relates to physical characteristics but also to more general qualities such as

uses or activity within an area. Appearance relates to the visible physical qualities of the area.

Importantly, however, the concept of the setting of a conservation area is not enshrined in legislation and does not therefore attract the weight of statutory protection¹¹.

Recent case law¹² has confirmed that Parliament’s intention in enacting section 66(1) was that decision-makers should give “considerable importance and weight” to the desirability of preserving the setting of listed buildings, where “preserve” means to “to do no harm” (after South Lakeland). Case law has confirmed that this weight can also be applied to the statutory tests in respect of conservation areas¹³. These duties, and the appropriate weight to be afforded to them, must be at the forefront of the decision makers mind when considering any harm that may accrue and the balancing of such harm against public benefits as required by national planning policy. The Secretary of State has confirmed¹⁴ that ‘considerable importance and weight’ is not synonymous with ‘overriding importance and weight’.

There is no equivalent statutory duties for the preservation and or enhancement of a registered park and garden of special historic interest.

National Policy
National Planning Policy Framework (NPPF) 2018
The National Planning Policy Framework (NPPF) was introduced in March 2012 as the full statement of Government planning policies covering all aspects of the planning process. The revised National Planning Policy Framework was published in July 2018 and replaced the previous version published in 2012.

Chapter 16 of the NPPF outlines the Government’s guidance regarding conserving and enhancing the historic environment in more detail.

The glossary of the NPPF (Annex 2) defines conservation as the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

With regard to the plan making process; paragraph 185 of the NPPF sets out that local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. They should take into account:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- the desirability of new development making a positive contribution to local character and distinctiveness; and
- opportunities to draw on the contribution made by the historic environment to the character of a place.

When considering the designation of conservation areas; either new or amended, local planning authorities are required by paragraph 186 to ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.

Paragraph 189 requires the significance¹⁵ of the heritage assets, which may be affected by the proposals to be described as part of any submission, ideally as part of a Heritage Statement report or similar, including any contribution made by their setting¹⁶. The level of detail should be proportionate to the asset’s importance and no more than is sufficient to understand the potential effect of the proposal on their significance.

¹⁵ **Significance** – The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting (NPPF Annex 2: Glossary)
¹⁶ **Setting of a heritage asset** – The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral (NPPF Annex 2: Glossary)

Paragraph 190 sets out that local planning authorities should also identify and assess the particular significance of heritage assets that may be affected by proposals. They should take this assessment into account when considering the impact of proposals in order to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal.

Paragraph 192 states that local planning authorities should take account of the desirability of sustaining and enhancing the significance of all heritage assets and putting them into viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 193 further outlines that local planning authorities should give great weight to the asset’s conservation¹⁷ when considering the impact on a proposed development on the significance of a designated heritage asset¹⁸. The more important the heritage asset, the greater the weight should be.

Paragraph 194 specifies that any harm to, or loss of, significance of a designated heritage asset should require clear and convincing justification.

Paragraph 195 outlines that local planning authorities should refuse consent where a proposal will lead to substantial harm or total loss of significance, unless it can be demonstrated that this is necessary to deliver substantial public benefits that outweigh such harm or loss, or a number of other tests can be satisfied.

Paragraph 196 concerns proposals which will lead to less than substantial harm to the significance of a designated heritage asset. Here harm should be weighed against the public benefits, including securing the optimum viable use.

Paragraph 197 confirms that the effect of an application on the significance of a non-designated heritage asset should be taken in account in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be

¹⁷ **Conservation** – The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance (NPPF Annex 2: Glossary)
¹⁸ **Designated Heritage Asset** – A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area under the relevant legislation (NPPF Annex 2: Glossary)

¹¹ APP/H1705/A/14/2219070
¹² Barnwell Manor Wind Energy Limited and (1) East Northamptonshire District Council (2) English Heritage (3) National Trust (4) The Secretary of State for Communities and Local Governments, Case No: C1/2013/0843, 18th February 2014
¹³ The Forge Field Society v Sevenoaks District Council [2014] EWHC 1895 (Admin); North Norfolk District Council v Secretary of State for Communities and Local Government [2014] EWHC 279 (Admin)
¹⁴APP/H1705/A/13/2205929

required having regard to the scale of any harm or loss and the significance of the heritage asset.

Paragraph 200 states that proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance), should be treated favourably. It outlines that local planning authorities should also look for opportunities for new development within conservations areas and the setting of heritage assets to enhance or better reveal their significance. Paragraph 201 states that not all elements of a conservation area will necessarily contribute to its significance. Loss of a building (or other element which makes a positive contribution to the significance should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the area as a whole.

National Guidance

National Planning Practice Guidance (NPPG) National Planning Practice Guidance (NPPG) was first issued in 2014 by the Government as a web resource and living document, including a category on conserving and enhancing the historic environment. This is intended to provide more detailed guidance and information with regard to the implementation of national policy set out in the NPPF.

The NPPG helps to define some of the key heritage terms used in the Framework. With regard to substantial harm, it is outlined that in general terms this is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special interest. Optimum viable use is defined in the NPPG as the viable use likely to cause the least harm to the significance of the heritage asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes.

Public benefits are also defined in the NPPG, as anything that delivers economic, social and environmental progress as described in the NPPF. Public benefits should flow from the proposed development, and they may include heritage benefits.

Department of Culture, Media and Sport Circular: Principles of Selection for Listing Buildings 2010 The Principles of Selection for listing buildings sets out the general criteria for assessing the special interest of a building in paras. 9 and 10, as below:

“Architectural Interest. To be of special architectural interest a building must be of importance in its architectural design, decoration or craftsmanship; special interest may also apply to nationally important examples of particular building types and techniques (e.g. buildings displaying technological innovation or virtuosity) and significant plan forms;

Historic Interest. To be of special historic interest a building must illustrate important aspects of the nation’s social, economic, cultural, or military history and/or have close historical associations with nationally important people. There should normally be some quality of interest in the physical fabric of the building itself to justify the statutory protection afforded by listing.

10. When making a listing decision, the Secretary of State may take into account the extent to which the exterior contributes to the architectural or historic interest of any group of buildings of which it forms part. This is generally known as group value. The Secretary of State will take this into account particularly where buildings comprise an important architectural or historic unity or a fine example of planning (e.g. squares, terraces or model villages) or where there is a historical functional relationship between a group of buildings. If a building is designated because of its group value, protection applies to the whole of the property, not just the exterior.”

In addition to the criteria and general principles set out in the guidance, a number of Selection Guides for different building types have been re-published as updates by Historic England since 2017. These Selection Guides provide further information regarding each building type, and demonstrate what features are considered significant and likely to make a building of special architectural or historic interest when assessing each building type.

National Advice

Historic England: Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision Taking in the Historic Environment 2015 GPA Note 2 provides information to assist in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guidance (NPPG). These include; assessing the significance of heritage assets, using

appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, and marketing. It provides a suggested staged approach to decision-making where there may be a potential impact on the historic environment:

1. Understand the significance of the affected assets;
2. Understand the impact of the proposal on that significance;
3. Avoid, minimise and mitigate impact in a way that meets the objectives of the Framework;
4. Look for opportunities to better reveal or enhance significance;
5. Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change;
6. Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

With particular regard to design and local distinctiveness, advice sets out that both the With regard to design and local distinctiveness, advice sets out that both the NPPF (section 7) and NPPG (section ID26) contain detail on why good design is important and how it can be achieved. In terms of the historic environment, some or all of the following factors may influence what will make the scale, height, massing, alignment, materials and proposed use of new development successful in its context:

- The history of the place
- The relationship of the proposal to its specific site
- The significance of nearby assets and the contribution of their setting, recognising that this is a dynamic concept
- The general character and distinctiveness of the area in its widest sense, including the general character of local buildings, spaces, public realm and the landscape, the grain of the surroundings, which includes, for example the street pattern and plot size
- The size and density of the proposal related to that of the existing and neighbouring uses
- Landmarks and other built or landscape features which are key to a sense of place

- The diversity or uniformity in style, construction, materials, colour, detailing, decoration and period of existing buildings and spaces
- The topography
- Views into, through and from the site and its surroundings
- Landscape design
- The current and historic uses in the area and the urban grain
- The quality of the materials

Historic England: Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets 2017 (2nd Edition) The second edition of the GPA Note 3 provides information to assist in implementing historic environment policy with regard to the managing change within the setting of heritage assets, and also relevant views analysis. This also provides a toolkit for assessing the implications of development proposals affecting setting and views. A series of stages are recommended for assessment, these are:

- Step 1: identifying the heritage assets affected and their settings
- Step 2: assessing whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s)
- Step 3: assessing the effect of the proposed development
- Step 4: maximising enhancement and minimising harm
- Step 5: making and documenting the decision and monitoring outcomes.

Historic England: Advice Note 1: Conservation Area Designation, Appraisal and Management 2016 This Historic England Advice Note supports the NPPF and NPPG, and is intended to set out ways to manage change in a way that conserves and enhances historic areas through conservation area designation, appraisal and management. It seeks to offer advice to all those involved in managing conservation areas so that the potential of historic areas worthy of protection is fully realised, the need for community and owner consultation examined, and the benefits of management plans to manage change, and achieve

regeneration and enhancement, fully exploited. Advice on appraisal of conservation areas is also given, as assistance in demonstrating special interest and articulating character, guiding investment, and in developing a management plan.

Historic England: Advice Note 2: Making Changes to Heritage Assets 2016

This advice note provides general advice according to different categories of intervention in heritage assets, including repair, restoration, addition and alteration, as well as on works for research alone. This covers different types of heritage assets, including buildings and other structures; standing remains including earthworks; buried remains and marine sites; as well as larger heritage assets including conservation areas, registered landscapes, and World Heritage Sites.

The Development Plan

The objectives of national policy and the development plan, with regard to the protection of heritage assets, should be closely aligned. Local authorities should also ensure that aspects of conservation policy that are relevant to development control decisions are included in the local development plan.

The London Plan (Minor Alterations to the London Plan) 2016

The London Plan was adopted by the Greater London Authority in July 2011 and sets out the Spatial Development Strategy for all Boroughs within Greater London. It replaces the London Plan (consolidated with alterations since 2004), which was published in February 2008. The Plan has been subsequently revised to ensure consistency with the Framework and other changes since 2011. The plan has been amended through the publication of Revised Early Minor Alterations (October 2013) and Further Alterations to the London Plan (FALP) (January 2014 and March 2015). In May 2015 two sets of Minor Alterations to the London Plan (MALPs) – Housing Standards and Parking Standards – were published for public consultation. These were prepared to bring the London Plan in line with new national housing standards and the Government’s approach to car parking policy. An Examination in Public considered the MALPs in October 2015, and they were formally published as alterations to the London Plan in March 2016.

The London Plan sets out strategic policies regarding the historic environment in London, including Policy 7.8 (Heritage assets and archaeology), which states that:

“Strategic

A 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.

B Development should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site’s archaeology.

Planning decisions

C Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.

D Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

E New development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset ...”

A new London Plan has been issued in draft by the GLA for consultation (1 December 2017 - 2 March 2018). However, this emerging planning policy is in its very earliest stages and should be afforded little or no weight at this time. Draft Policy HC1 of the new London Plan relates to reconciling heritage conservation and growth. Policies HC3 and HC4 provide policy advice with regard to strategic and local views, and the London View Management Framework, respectively.

London Borough of Bromley Unitary Development Plan 2006 (Saved)

Bromley's UDP was adopted on 20 July 2006. A number of policies in the UDP expired on 20 July 2009. The remaining policies continue to be saved as part of the Development Plan.

Generally and with regard to the design of new development, Policy BE1 sets out that:

“All development proposals, including extensions to existing buildings, will be expected to be of a high standard of design and layout. To those ends, proposals will be expected to meet all of the following criteria ... [as listed]”

With regard to listed buildings, Policy BE8 states:

“Applications for development involving a listed building or its setting, or for a change of use of a listed building, will be permitted provided that the character, appearance and special interest of the listed building are preserved and there is no harm to its setting. In the case of a change of use, the applicant needs to additionally demonstrate that the existing or last use is not viable or is no longer compatible with the building’s fabric, interior or setting.”

Policy BE9 also sets out that:

“Applications for planning permission that involve total or substantial demolition of a listed building will not be permitted unless:

(i) there is clear and convincing evidence that reasonable efforts have been made to continue the present use or to find a viable use for the building, and these efforts have failed, and it is demonstrated that preservation of the building as part of the development or in some form of charitable or community ownership is not possible or suitable, or;

(ii) the costs of repairs or maintenance of the building cannot be justified against its importance or the value derived from its retention, provided that the building has not been deliberately neglected, or;

(iii) there will be substantial planning benefits for the community from redevelopment which would decisively outweigh the loss from the resulting demolition;

A condition will be imposed to ensure that the demolition will not take place until a contract has been

let for the carrying out of the development that necessitates the demolition.”

With regard to locally listed buildings, Policy BE10 states that:

“A proposal to alter, extend or for the change of use of a locally listed building will be permitted provided that:

(i) it will be sympathetic to the character, appearance and special local interest of the building; and

(ii) will respect its setting.

Permission will only be granted for the replacement of such buildings where:

(iii) applicants have demonstrated that all reasonable options for the retention of the building have been considered; and

(iv) the proposed new building is of an exceptionally high standard of design.”

With regard to conservation areas, Policy BE11 sets out that:

“In order to preserve or enhance the character or appearance of conservation areas, a proposal for new development, for engineering works, alteration or extension to a building, or for change of use of land or buildings within a conservation area will be expected to:

(i) respect or complement the layout, scale, form and materials of existing buildings and spaces;

(ii) respect and incorporate in the design existing landscape or other features that contribute to the character, appearance or historic value of the area; and

(iii) ensure that the level of activity, traffic, parking services or noise generated by the proposal will not detract from the character or appearance of the area.”

Also policy BE12 states that:

“A proposal for a development scheme that will involve the total or substantial demolition of an

unlisted building in a conservation area that makes a positive contribution to its character or appearance will not be permitted unless the following can be demonstrated:

(i) there is clear and convincing evidence that reasonable efforts have been made to continue the present use or to find a viable use for the building and these efforts have failed and it is demonstrated that preservation of the building as part of the scheme or in some form of charitable or community ownership is not possible or suitable, or

(ii) the costs of repairs or maintenance of the building cannot be justified against its importance or the value derived from its retention, provided that the building has not been deliberately neglected, or

(iii) there will be substantial planning benefits for the community from redevelopment which would decisively outweigh loss from the resulting demolition.

Acceptable and detailed plans for a replacement scheme will be required, even if it will involve total or substantial demolition of an unlisted building in a conservation area that makes little or no contribution to the character or appearance of that area.

A condition will be imposed on a planning permission granted, to ensure that demolition shall not take place until a contract for the carrying out of the development works has been made.”

Policy BE14 states that:

“Development will not be permitted if it will damage or lead to the loss of one or more trees in conservation area, unless:

(i) removal of the tree/s is necessary in the interest of good arboricultural practice, or

(ii) the reason for the development outweighs the amenity value of the tree/s.

(iii) in granting permission for the development, one or more appropriate replacement trees of a native species will be sought either on or off site through the use of conditions or planning obligations.”

With regard to historic parks and gardens, Policy BE15 sets out that:

“Applications within or adjoining a registered historic park or garden will be expected to protect the special features, historic interest and setting of the park or garden. The Council will seek to ensure that the park or garden is appropriately managed or maintained in a manner which reflects its status and designation.”

In addition, Policy BE18 states that:

“Development that adversely affects important local views, or views of landmarks or major skyline ridges, as identified in Appendix VII, will not be permitted.”

Supplementary Planning Documents / Guidance

These planning documents include:

- Crystal Palace Park Conservation Area Appraisal SPG (LBB 2002)
- Adopted SPG1 - General design principles (LBB 2004)



Crystal Palace National Sports Centre, Crystal Palace Park, London Borough of Bromley

Planning Policy Context

The NSC and the part of Crystal Palace Park which falls within the Options study area is located within the London Borough of Bromley (LBB).

The Development Plan comprises:

- The London Plan (2016); and
- The Bromley UDP (2006) saved policies.

The London Plan (2016) is the overall strategic plan for London. In November 2017, the Mayor published the draft New London Plan which will be the subject of an Examination in Public in early 2019 which is due to be adopted towards the end of 2019.

LBB are currently at a late stage in the preparation of their Local Plan which will supersede the saved UDP policies. The Local Plan has been through examination in August 2015. LBB published their Main Modifications July/August 2018.

The site is subject to a number of planning designations which need to be considered in developing options for the site. These include:

- Crystal Palace National Recreation (Sports) Centre – listed Grade II;
- Crystal Palace Park – Registered Park and Garden;
- Crystal Palace Park Conservation Area;
- Metropolitan Open Land (MOL);
- Major Development Site (MDS); and
- Strategic Outer London Development Centre.

Within the Options study area the Athletics Stadium (Jubilee), The Lodge Tower, Staff Houses and Caretakers Lodge are all locally listed.

We set out below relevant planning policy with respect to key considerations:

Development

The NSC is classified as a Major Development Site (MDS). Any infilling or redevelopment needs to meet certain criteria to be deemed appropriate development. The policy requires that development:

- Improve the openness of the Park or have no greater impact on the NSC land and the Park in relation to the guidelines for MOL;
- Not exceed the height of the existing NSC building or the athletics stadium;
- Enhance the visual amenities of the Park landscape;
- Contribute to the achievement of the objectives for the long term regeneration of the Park, including integration with the parkland surroundings; and
- Be restricted to indoor or outdoor sporting uses only including facilities.

Within the London Plan the NSC is identified as a Strategic Outer London Development Centre which defines these sites as:

“Strategic development centres in outer London or adjacent parts of inner London with one or more strategic economic functions of greater than sub-regional importance, which include possible sources of new economic growth or existing sources which could help achieve a step change in economic performance.”

Loss of Housing (The Lodge Tower, Staff Houses and Caretakers Lodge)

There is a general presumption against the loss of residential accommodation at strategic and local level. Both the GLA and LB Bromley (LBB) are promoting significant housing growth. From an LBB perspective their planning policy seek to resist the loss of existing housing in both the current UDP and the emerging Local Plan unless the accommodation is unsuitable and incapable of being adapted OR the proposal meets an identified need for community facilities.

The UDP policy does not make reference to hostels. The emerging Local Plan does however make provision for the supply of suitable non self-contained accommodation, which hostels could be argued to fall within. The emerging Plan also has a specific policy that resists the loss of specialist accommodation (the draft document refers to older people’s accommodation and does not explicitly refer to other specialist housing types). Hostel accommodation could be argued to fall within this category.

We list out below the key policy information from Bromley’s current UDP and the emerging Local Plan concerning loss of housing / hostel accommodation.

UDP Policy H1 ‘Housing Supply’

Making provision for at least 11,450 additional dwellings over the plan period will be facilitated by:
(iii) not permitting the loss of housing through redevelopment or change of use, except where accommodation is unsuitable and incapable of being adapted for continued residential use or where the proposal meets an identified need for community facilities;

4.54 The Housing Capacity Study (see Table 4.1) indicated a capacity of 300 dwellings in non self-contained accommodation over the period 1997-2016. London Planning Advisory Committee (LPAC) advice calls on boroughs to assess the need for housing provided by non self-contained accommodation, including houses in multiple occupation (HMOs). Boroughs should seek to retain and improve such accommodation, where appropriate. Applications for non self-contained accommodation will be supported provided they meet a need identified in the Housing Needs Survey and provide a satisfactory living environment appropriate to their surroundings – as defined in this and the other policies of the plan.

Local Plan Draft Policy 1 ‘Housing Supply’

The Council will make provision for a minimum average of 641 additional homes per annum over the ten year plan period and where possible over the fifteen year plan period which will be achieved by:

- g - The provision of suitable non self-contained units;
- i - Resisting the loss of existing housing except where accommodation is unsuitable and incapable of being adapted for continued residential use or where the proposal meets an identified need for community facilities;

Local Plan Draft Policy 11 ‘Specialist & Older Peoples Accommodation’

The Council supports the provision of specialist housing across all tenures, where they are conveniently located for a range of local shops, services and public transport, appropriate to the mobility of the residents, and they provide appropriate parking and suitably landscaped amenity space. Proposals involving the loss of sites currently providing specialist accommodation will be resisted unless:

a - it can be demonstrated that there is no demand for the existing accommodation and no demand for sites from alternative providers, or

b - there is equal or greater replacement provision of improved specialist accommodation in an alternative appropriate location.

Local Plan Draft Policy 11 ‘Specialist and older people’s accommodation’

“2.1.80A: The Council wishes to encourage the provision of a high quality living environment for those living in Specialist accommodation, which includes supported housing to meet the different accommodation needs of people with learning disabilities, mental health problems, as well as specialist housing for older people”

Loss of Community Facilities

Any proposal for the removal of community facilities would have to overcome draft Policy 20 of the emerging Local Plan. Like housing, there is a general presumption against the loss of community facilities within the Borough as noted below.

“Planning permission will not be granted for proposals that would lead to the loss of community facilities, unless alternative enhanced provision is to be made in an equally accessible location for the community it serves, or it can be demonstrated that there is no longer a need for them or other forms of social infrastructure. Where a proposal for alternative social infrastructure involves a change of use not permitted under the GDPO Use Classes Order, the lack of need for the specific use class must first be demonstrated. Additionally, in respect of facilities identified by local communities as having significant value, planning permission for alternative uses will only be considered where it can be demonstrated that no prospective purchasers exist that would be willing to pay both a suitable price and maintain the existing use.”

A convincing case would need to be prepared to demonstrate why an existing facility on site currently used as community facilities can no longer meet a community need.

Metropolitan Open Land

The park is designated MOL, which is the designation given to Green Belt land within Central and Outer London. This

designation restricts development unless justified by ‘Very Special Circumstances’, which can include:

- Essential facilities for outdoor sport and outdoor recreation
- Limited infilling or redevelopment

The reuse of buildings within MOL is not inappropriate development provided it meets certain tests, the principle of which is that the reuse must not have a materially greater impact than the present use on the openness of the MOL and the purposes of including land in it. Strict control is exercised over the extension of re-used buildings, and over any associated uses of land.

A recurring theme of MOL Policy is that development should contribute to the achievement of the objectives for the use of land in MOL and not conflict with the purposes of designating the land as MOL.

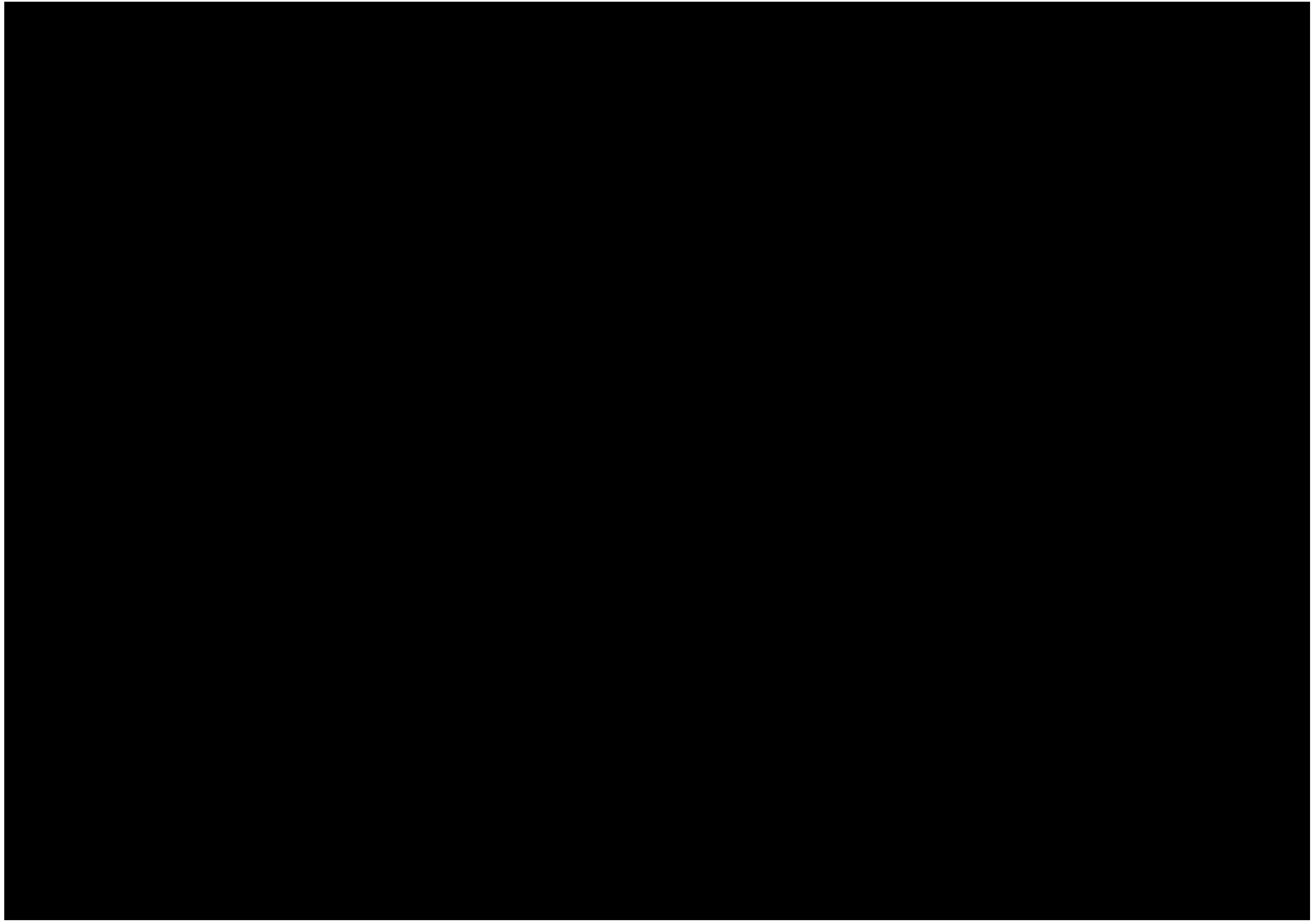
At local level development within the MOL has to meet at least one of several criteria to justify its inclusion within the MOL and it is noted that there may be a case to argue that point ii) can be met which states:

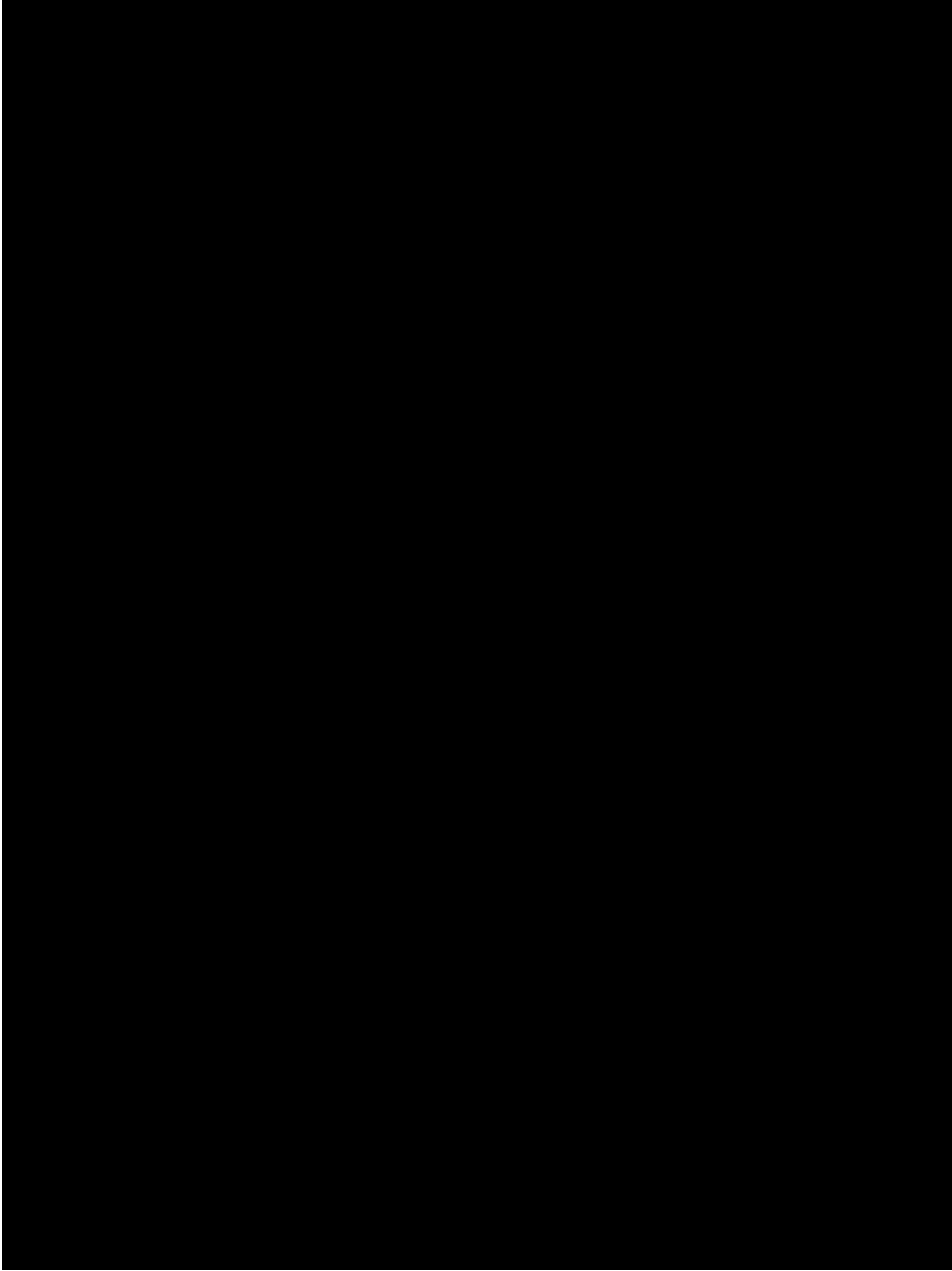
ii) it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London.

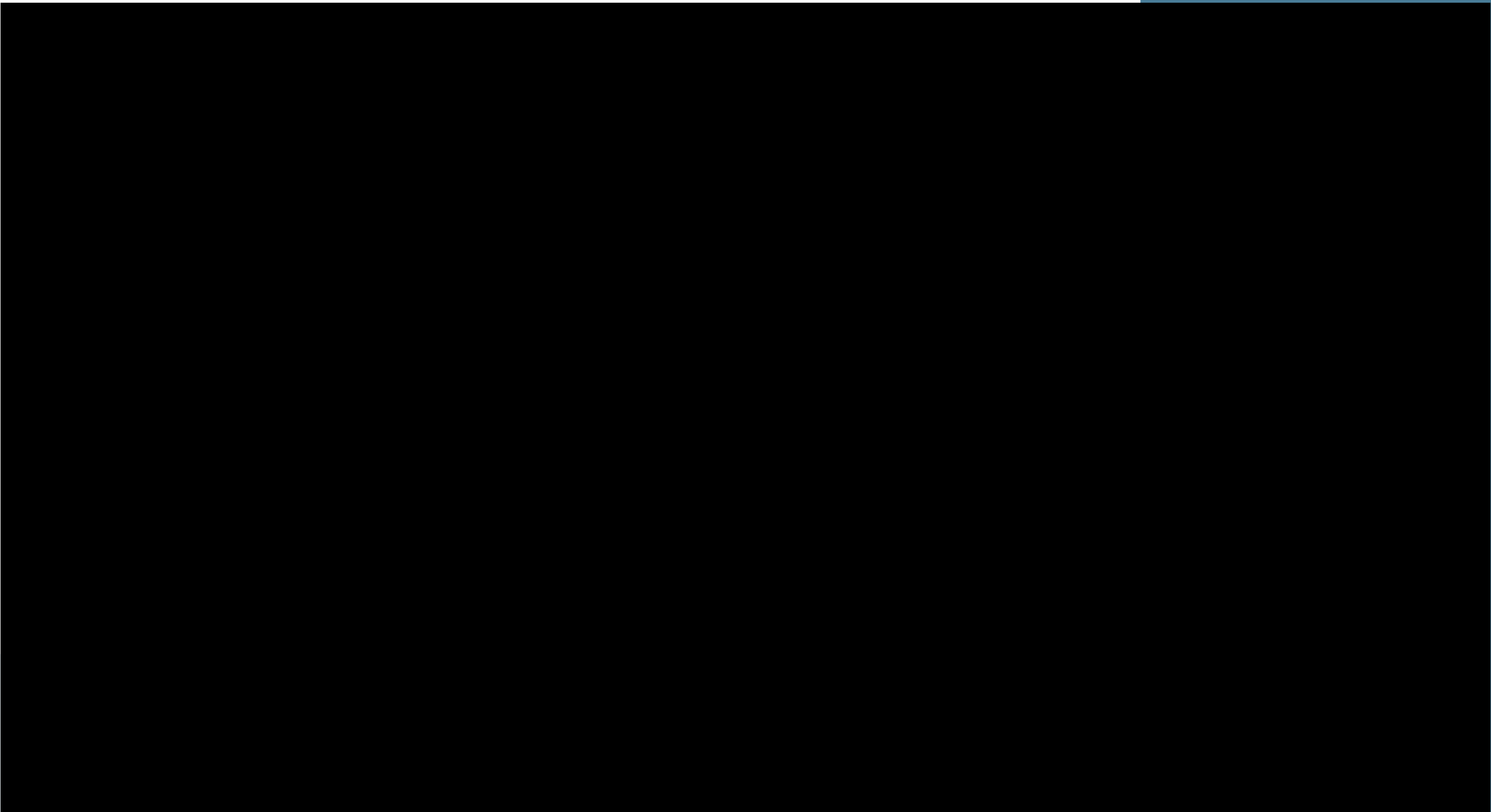
Heritage

Refer to the Initial Built Heritage Appraisal for an analysis of key heritage constraints and opportunities.









1

Stakeholder and Community Engagement

1.1

Overview

Overview:

As one of the Mayor’s Strategic Outer London Development Centres, Crystal Palace and the National Sports Centre will continue to play a major role in inspiring people of all ages to participate in sports, encouraging physical activity, health and wellbeing for the whole community. Spanning across community events, professional training and competitions, the NSC will meet the needs of local people and the sporting community alike. It is a place where people come to watch sports and then participate themselves. This ability to enthuse and inspire is fundamental to the success of the NSC.

It is therefore imperative that the venues present themselves as a community asset open to all, that blend into the park setting and break down barriers to community involvement. The regeneration of the NSC is driven by local aspirations, captured and articulated through an extensive programme of stakeholder engagement. This engagement takes account of a range of views from user groups, sporting bodies, heritage and other amenity groups, local boroughs and organisations, including schools and clubs as well as the wider public. This ensures that the re-developed NSC is fit for purpose as a major community asset for Londoners.

The main aim of the Stakeholder and Community Engagement programme for the NSC Design and Feasibility Study is to:

- Enable the community to contribute ideas and appreciate the challenges being faced.
- Present a formal consultation on the options.
- Involve partners and stakeholders closely and at all key stages.

1

1.2

Stakeholder and Community Engagement Approach

Right

Engagement Strategy diagram devised by Pidgin Perfect for project

Approach

Honest & Iterative Process

Desk research provided an insight into the challenges and failings of previous stakeholder and community engagement processes related to the future of the Sports Centre.

A number of articles and blogs indicated that previous consultation was limited in terms of reaching audiences beyond professional sporting bodies, had been poorly advertised with little advanced noticed, and most importantly, were unclear in their purpose and intent.

The approach adopted as part of this stakeholder and community engagement process was developed to systematically resolve the issues created by the previous consultation.

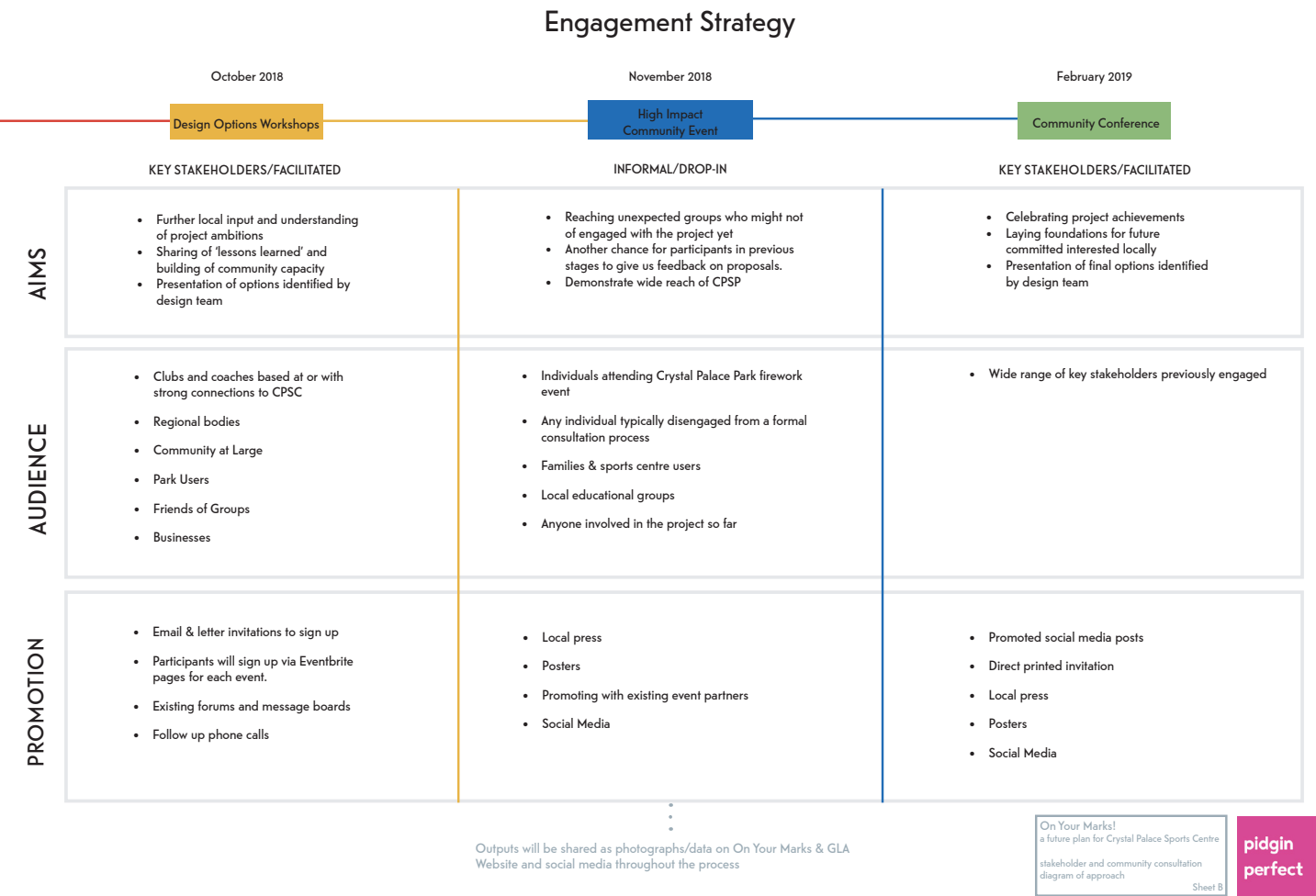
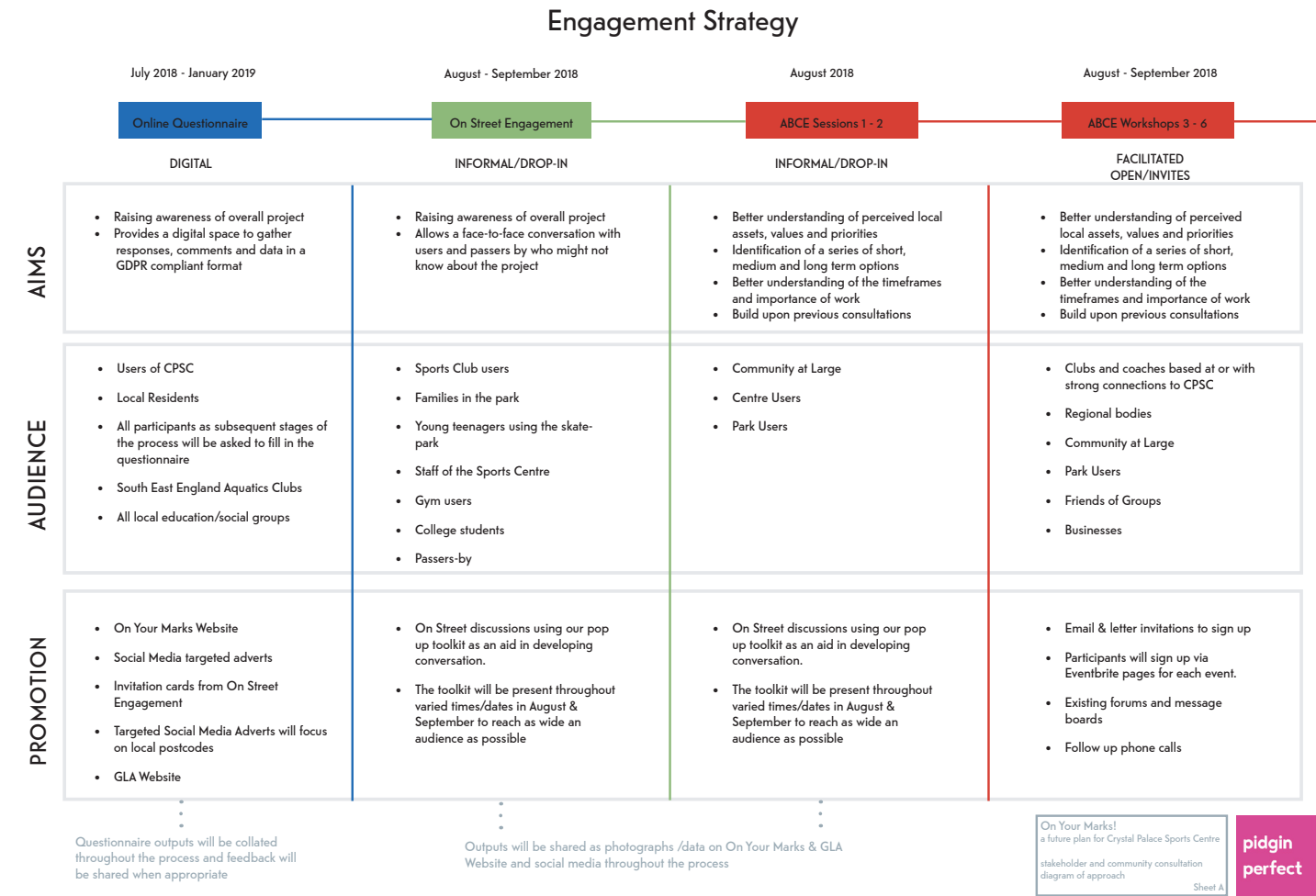
The diagram opposite outlines our approach to the consultation between July 2018 and January 2019.

Critically, an online platform was created at the beginning of this process which centralised all communications for the project and provided information on its purposes and its difference from that of previous consultations. This online platform helped to provide clear and unambiguous information on the project, explaining who is involved and their role within the project. The online platform was launched in late July with the release of an integrated and animated questionnaire.

A pop-up exhibition based in the foyer of the Sports Centre was established in late August, forming a permanent space for information and engagement for the duration of the project.

A multitude of opportunities for face-to-face engagement formed the core of this project, including initial public events in August and September and design studies workshops in October.

This culminated in a concluding Community Conference, held in February 2019. This included a presentation of final design options by the project team.



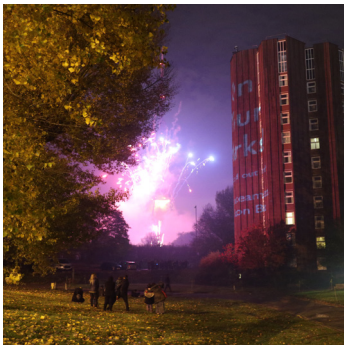
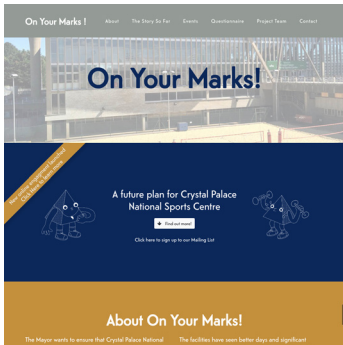
Approach

Project Timeline

The On Your Marks! engagement programme ran between August 2018 and March 2019, encompassing 5 stages and including 12 public points of engagement and a 7 month online survey period.

The process was built around a series of iterative event engagement periods, with each stage offering an opportunity for the project team to gather information, opinions and ideas, before reflection, development and further sharing.

Online Engagement	Coached by Community Workshops	Trialling the Design Options	High Impact Event - BEAM	Community Conference
Aug 18 - Mar 19	Aug - Sep 18	Oct 18	Nov 18	Feb 19
<ul style="list-style-type: none">• Raising awareness of overall project• Gathering data on participants use and experiences of the Centre	<ul style="list-style-type: none">• Developing a better understanding of community and sports users aspirations for the future of the Centre.• Building on previous consultation, to better understand design decisions driving future development	<ul style="list-style-type: none">• Further local input and understanding of project ambitions.• Presentation of initial options identified by design team	<ul style="list-style-type: none">• Reaching unexpected groups who might not have engaged with the project yet.• Another chance for participants in previous stages to give us feedback on proposals.	<ul style="list-style-type: none">• Celebrating project achievements.• Presentation of final options identified by design team.



Top Right
Bold, retro identity playing
with sporting idioms

Bottom Right
Illustrative devices and
colour palette

Project Identity

On Your Marks, Get Set, Go!

The audience for this project are potentially wary and have been over-consulted. With this in mind, we have selected to use language which demonstrates our awareness of previous problems. Our aim is also to increase appeal in the project beyond the usual suspects and differentiate this stakeholder and community engagement programme from those previous.

To achieve this, we have incorporated sporting idioms and phrases to appeal to a sporting audience and general local community; as well as firmly ground the project in a discussion about the Sports Centre as opposed to the complexities about the regeneration of the wider park.

Across the project we will use a tone which invites a wide range of participants to acts as Coaches - recognising and respecting their expertise and knowledge as the users and supports of the Sports Centre.

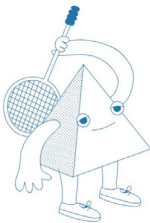
“On Your Marks! will support participants to help the Design Team formulate a training plan to coach the Sports Centre to achieve a new personal best.”

We have created a team of Mascot like characters to visualise and represent the diversity of professional audiences invested in the Sports Centre; including athletics, weight-lifting, running, diving and swimming.

The line drawing style provides a contemporary aesthetic, which helps to establish the Project Teams authority as design literate. The colours and typefaces used will reference faded sports equipment and the era in which the building was designed. The intention here is to create a nostalgic appeal, sense of pride for the history of the centre and it’s role for the community in the future.

The use of sporting idioms, the Mascot like characters and the colour palette ensures a consistency across the various strands of the stakeholder and community engagement programme, building connections between the project and the public.

On Your Marks!



a future plan for
the Crystal Palace
National Sports Centre

show us the ropes

get the ball rolling

MAYOR OF LONDON

Hawkins
Brown

pidgin
perfect

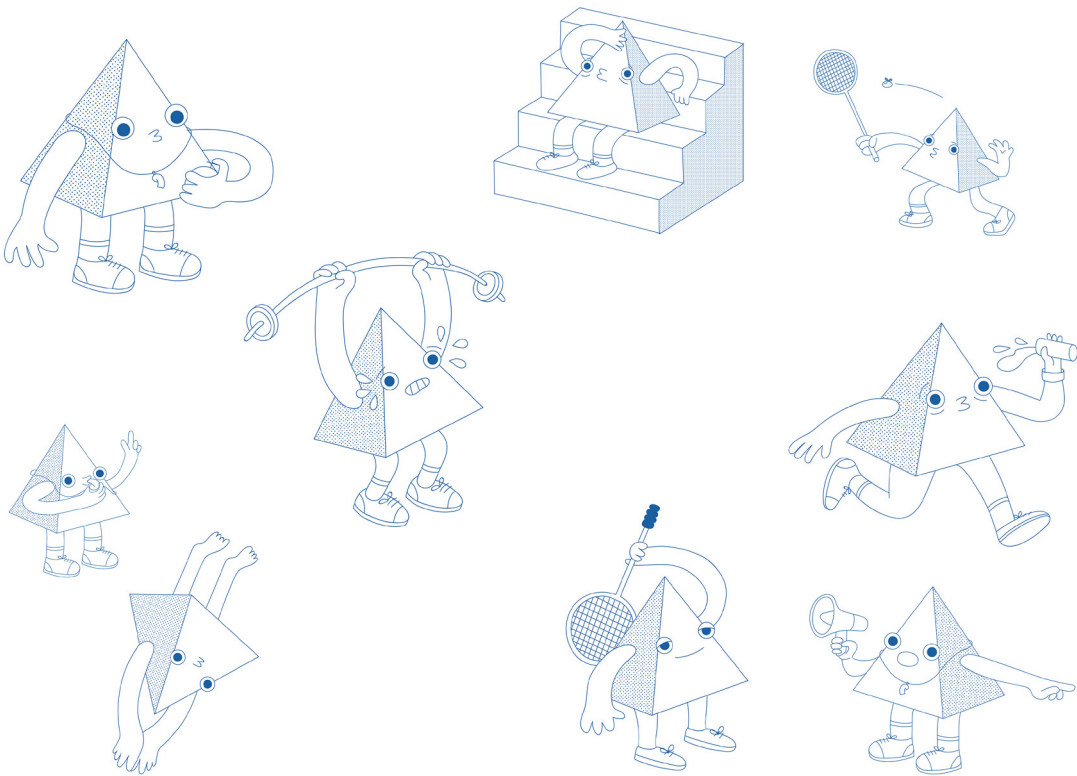
BOA

continuum
SPORTS & RECREATION LTD

M M
MOTT
MACDONALD

Turley

coached by community



1 Stakeholder and Community Engagement

1.4 Digital Engagement

Digital Engagement

On Your Marks! Website

Reaching more people leads to higher participation and more data and knowledge. Online participation is a welcome opportunity for community members unable or unwilling to attend public meeting formats; offering a medium for broader, more moderate views than those characteristics of traditional planning meetings attended.

The community can participate at anytime and from anywhere - as long as they have internet access. Many people don't have the time to participate in engagement activities. Online engagement platforms provide access to the process at virtually any time.

On-your-marks.co.uk has been created to act as the primary information and engagement resource as part of the digital engagement process. The website has been developed in a responsive format to work across all devices, and makes use of clear and accessible text to widen participation across a range of communities and abilities.

The website provides information under the following headings:

About: Introduction to the project, presentation of tone and commitment to involving a wide ranging audience in the consultation process. Short explanation of 'On Your Marks!' title and its connection to a final decision being made in 2019 by the Mayor of London.

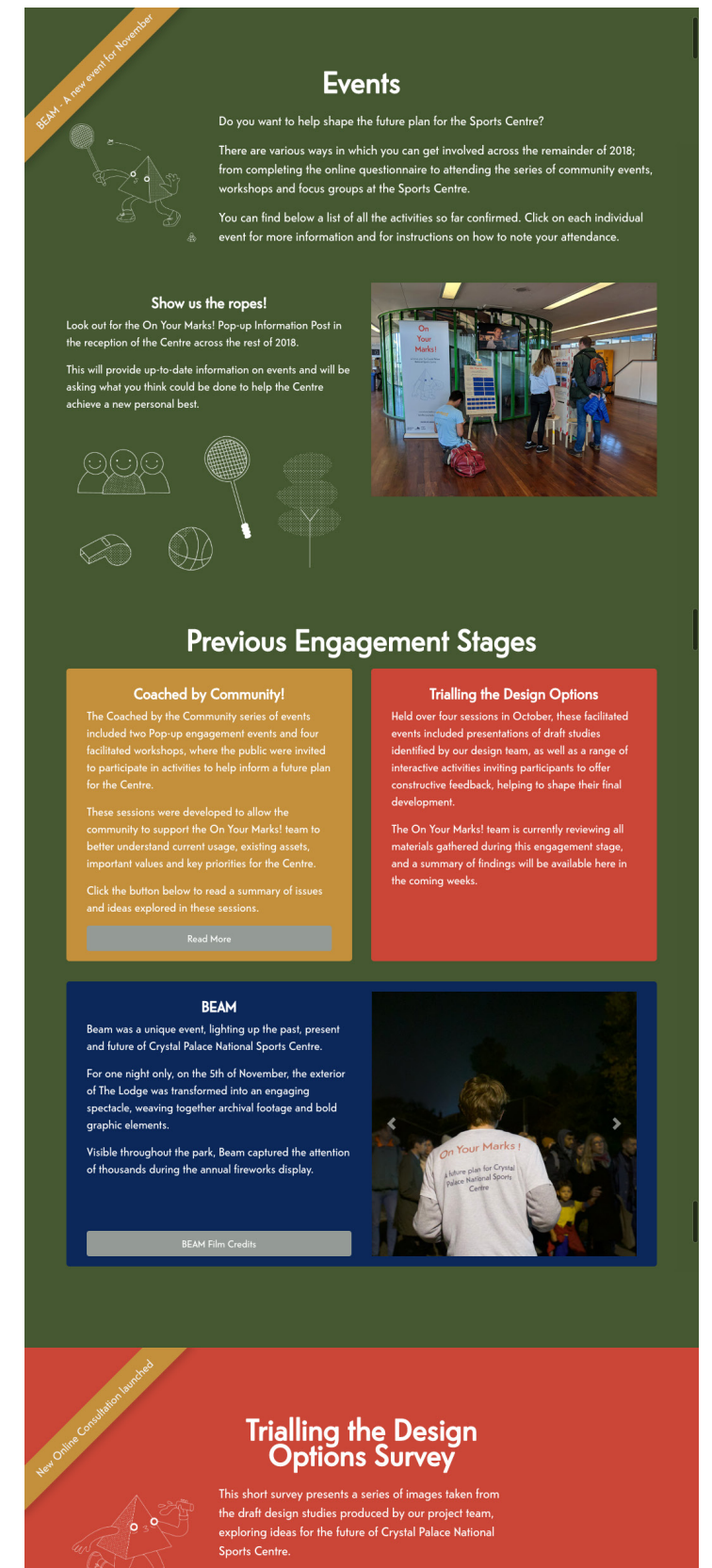
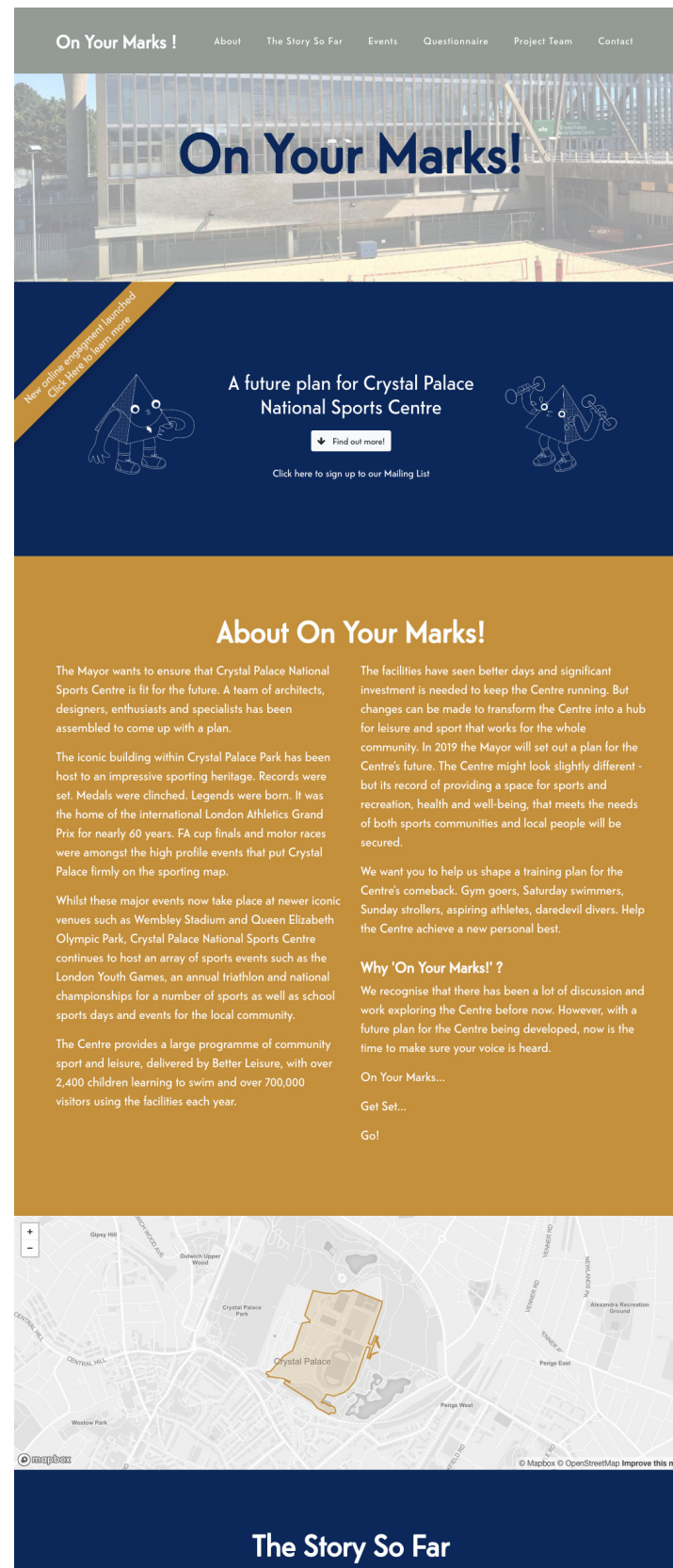
The Story So Far: Important background to the project provided by the GLA which outlines work previously delivered and the purpose of this new project.

Events: Encouragement to participate and information with regards to the various active and passive ways to get involved.

Questionnaire: Highly visual questionnaire designed in Typeform opens in a new browsing window and gathers baseline data about public usage, interactions and feedback on the Sports Centre.

Project Team: Profiles for each of the consultants involved in the Project Team and description of their specific roles and responsibilities in delivering the project.

Contact: Quick and simple digital portal to ask questions and provide comment.



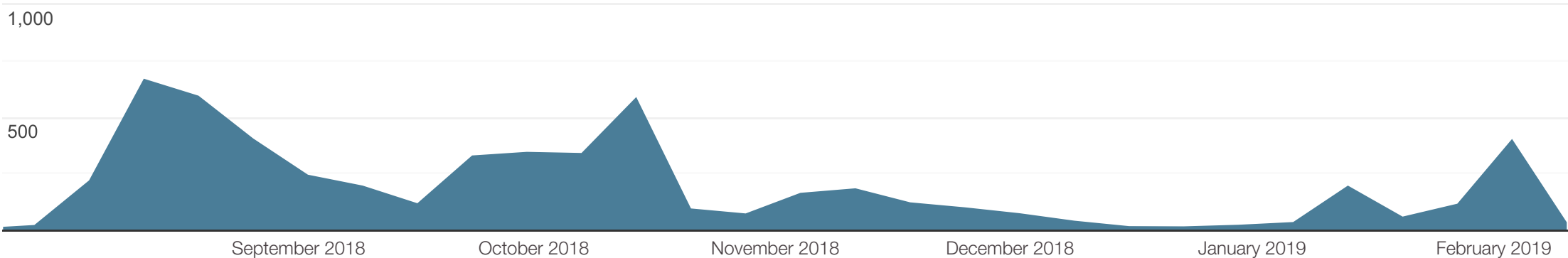
Digital Engagement

[On Your Marks! Website](#)

Engagement Statistics

25th July 2018 - 9 February 2019

Visitors per week



5,171

unique visitors

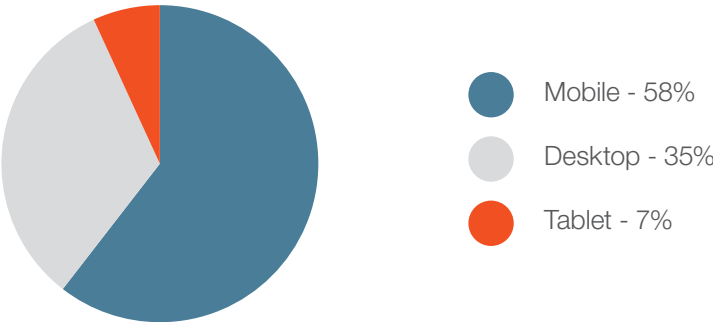
8,772

total pageviews

83%

of visitors from Greater London Area

Visitors by device type



1

Stakeholder and Community Engagement

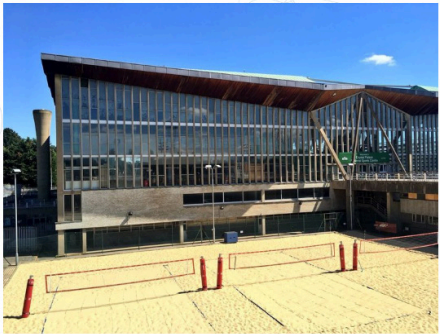
1.5

Online Questionnaire

1.5.1

Outcomes

Below
The On Your Marks! online questionnaire launched in August 2018.



On Your Marks!
Crystal Palace National Sports Centre Questionnaire

The On Your Marks! Team want to ensure that the voice of a wide range of users and the local community is at the heart of the future plan for the sports centre.

In order to get the ball rolling, we need you to complete our short

Start

press ENTER

Digital Engagement

Online Questionnaire

In conversation with the GLA, it was made clear that there have been a number of previous online questionnaires and surveys run by a number of organisations related the NSC.

In order to develop a baseline of data and information to inform the initial development of design studies, a new questionnaire was developed to understand the range of ways in which the Centre is presently used, by whom, and what were shared priorities and aspirations for its future.

The questionnaire was launched in early August, and remained open for the duration of the engagement period. On 3rd October, responses to date were collected and packaged, to feed in to the design development process.

Format

The survey consisted of a range of questions exploring participants perceptions and experiences of the Crystal Palace National Sports Centre currently, what facilities they made use of, and what aspirations and priorities they had for its future.

Responses

A summary of common responses is included below. A more detailed breakdown of responses is included as an appendix to this report.

Importance of the Centre

Respondents identified the location, scale and accessibility of the facilities as of primary importance to them.

Primary reason for visiting the Centre

Participants broadly identified specific sporting facilities as core to their interests in visiting the Centre. Central to these are the swimming pools and athletics track. A number of other facilities were also identified by participants, including diving, gymnastics, the gym, climbing, hockey, volleyball, weightlifting, as well as the nearby skatepark.

The Centre as a community facility

The role of the Centre as a community facility was also highlighted by respondents, with its setting within the park and unique scale and range of activities noted as positives.

General repair and maintenance of facilities

A number of respondents noted the need for repair and maintenance of some existing facilities, including changing facilities, as well as general modernisation of facilities and improved cleanliness.

Potential new facilities and activities

Participants listed a wide array of potential new activities that they would like to see at the Centre. Opportunities for walking, outdoor events and tournaments were the most popular responses.

Potential for improved social and catering facilities

Improved catering and social facilities were also noted as a potential draw for attendees, encouraging them to stay around the centre outside of sporting engagements.

1

Stakeholder and Community Engagement

1.5

Online Questionnaire

1.5.1

Outcomes

Digital Engagement

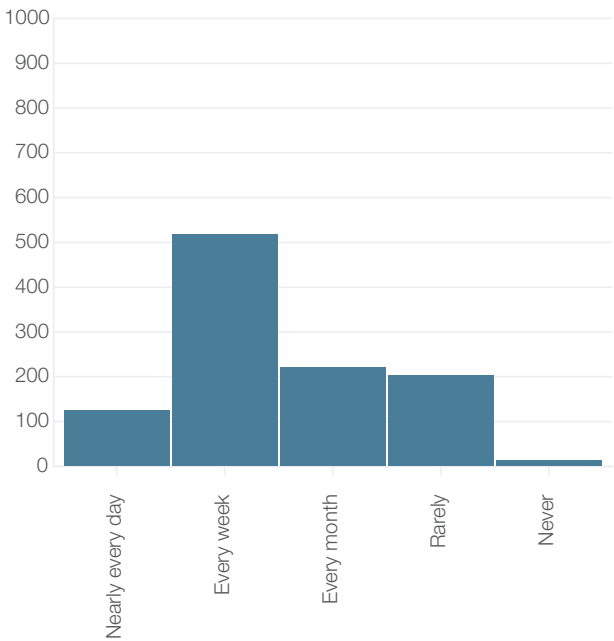
Online Questionnaire

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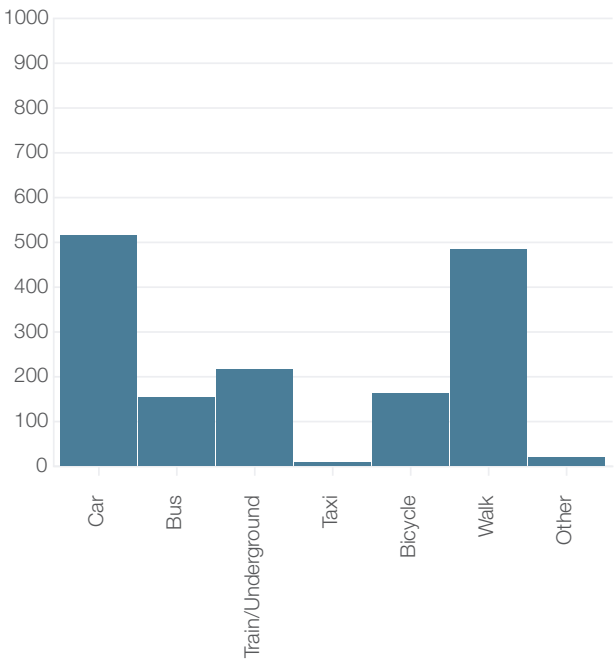
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The questionnaire was launched in early August, and remained open for the duration of the engagement period. On 3rd October, responses to date were collected and packaged, to feed in to the design development process. The following charts and information represents a breakdown of answers on this date.

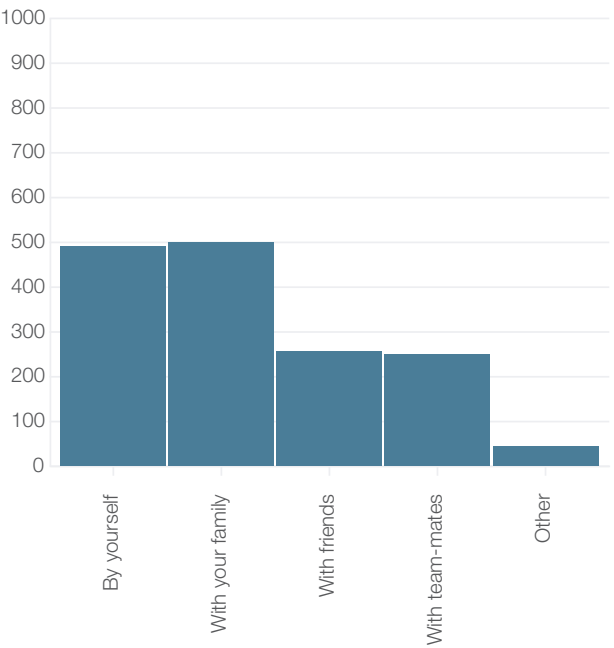
How often do you visit the centre?

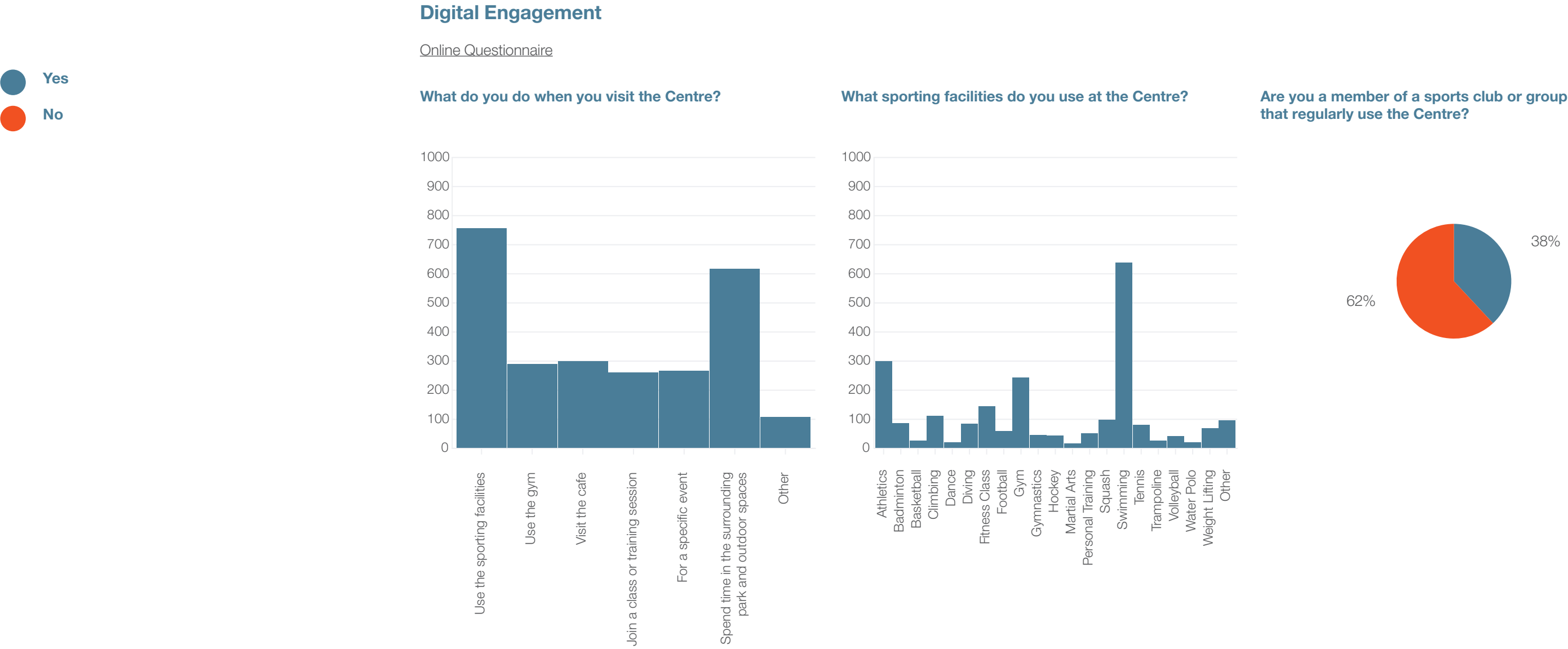


How do you normally travel to the Centre?



When you visit, who are you with?

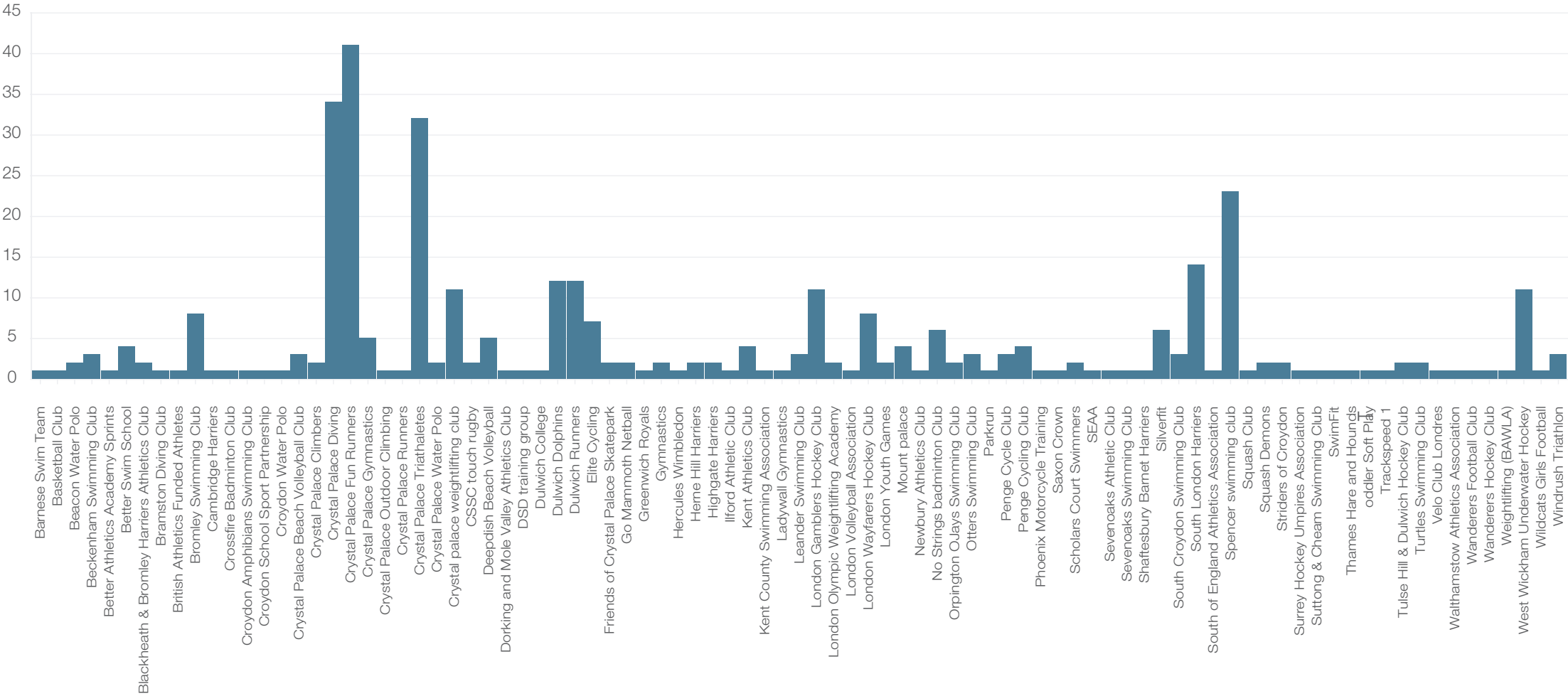




Digital Engagement

Online Questionnaire

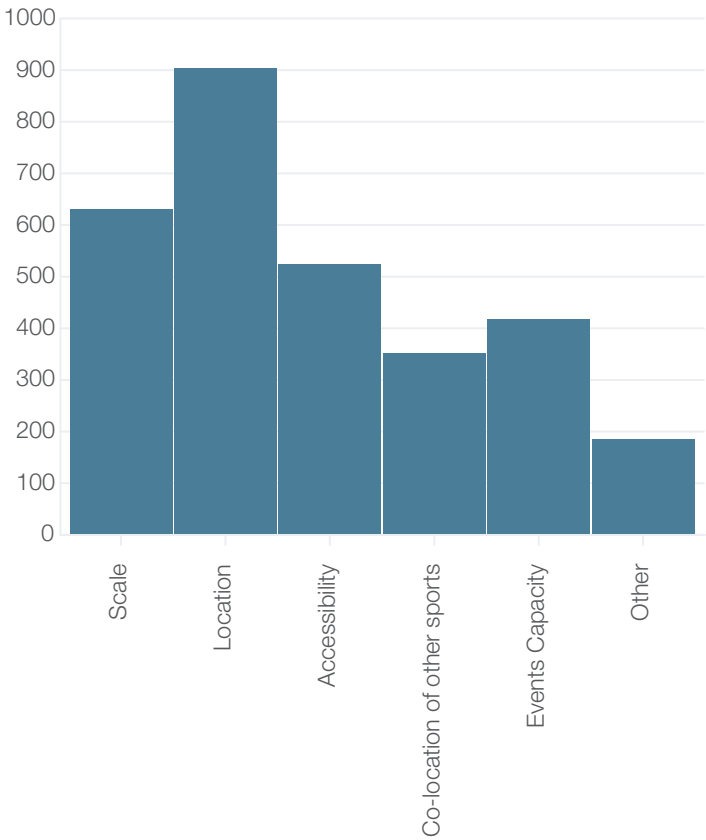
Which sports clubs or groups are you a member of?



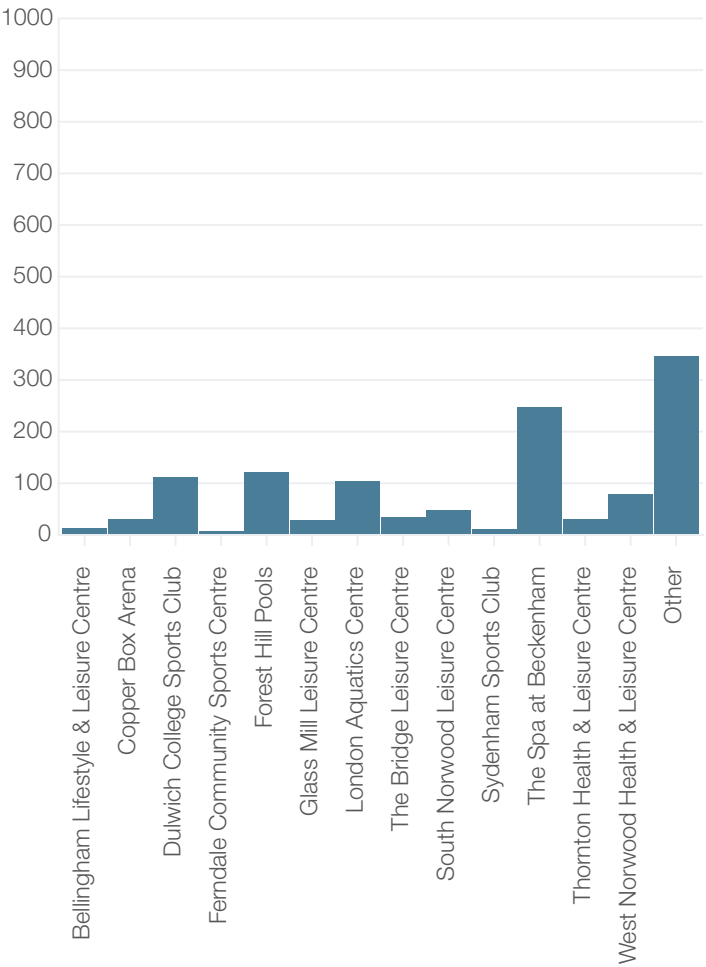
Digital Engagement

Online Questionnaire

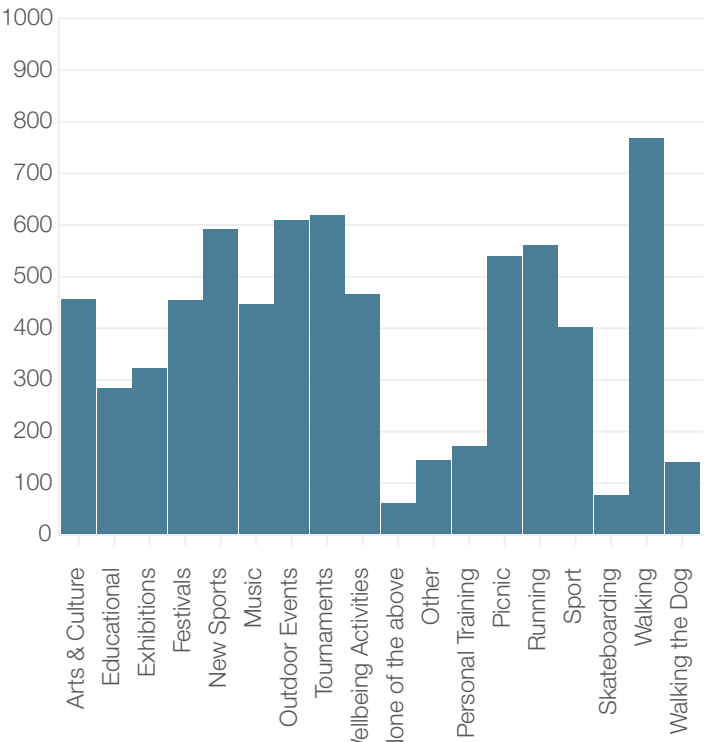
Why is the Centre important for you or your sport?



Where else do you access sporting facilities?



Which types of events and activities would you like to see more of at the Centre?

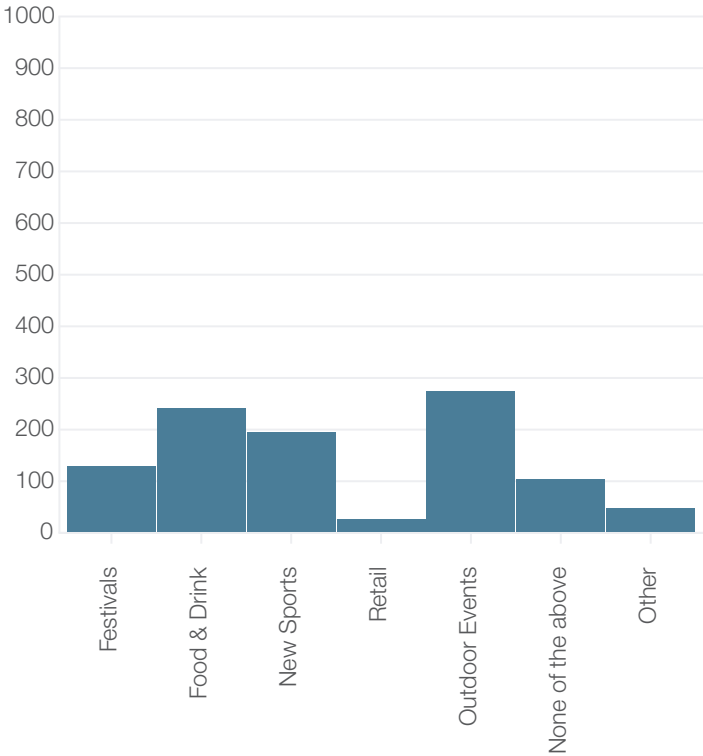




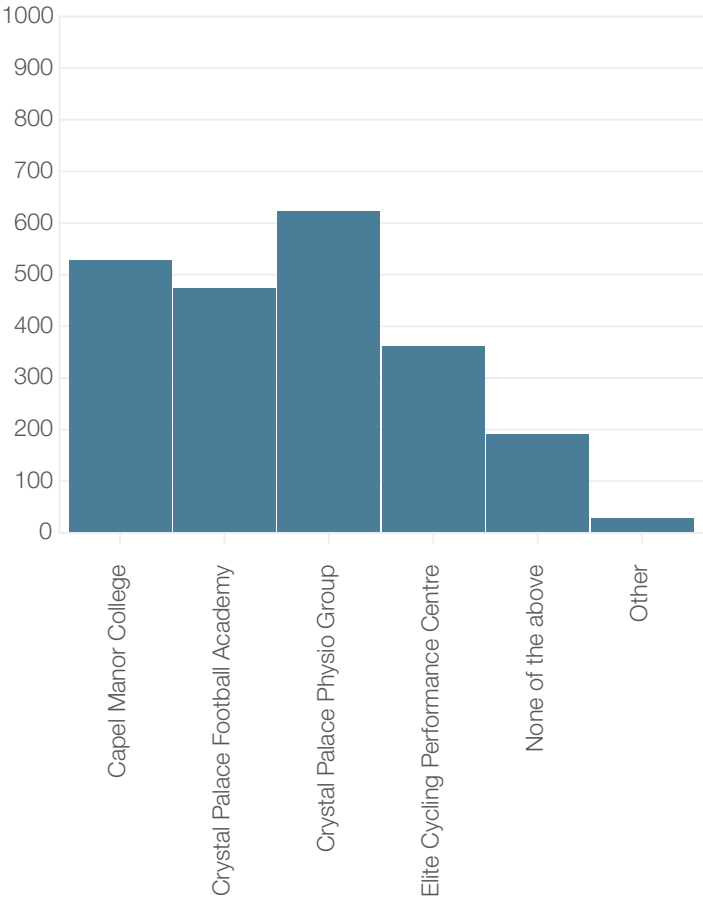
Digital Engagement

Online Questionnaire

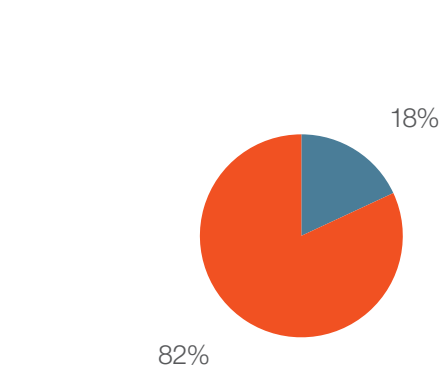
What would you like to do more of in and around the Centre?

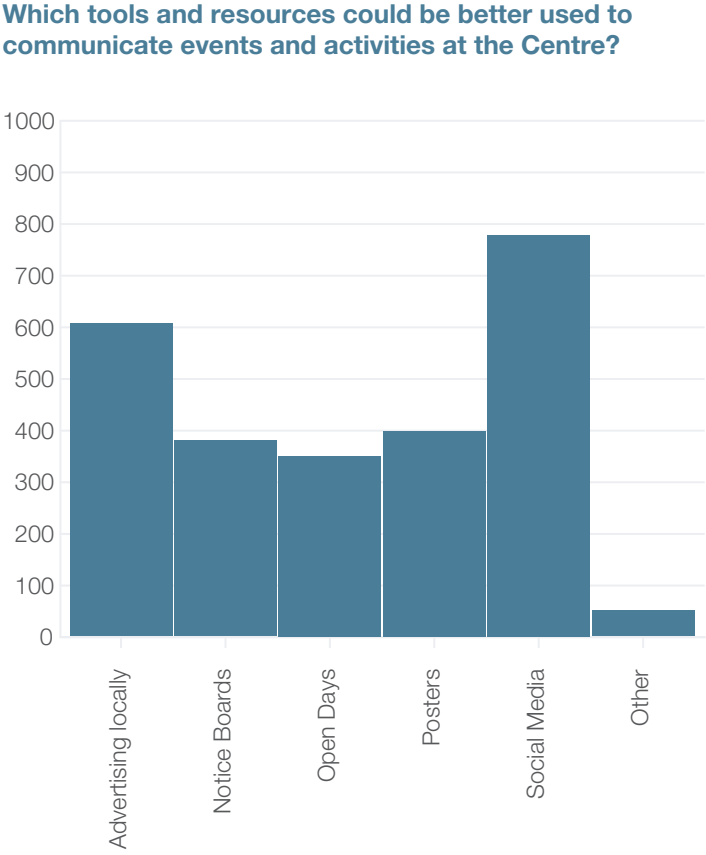
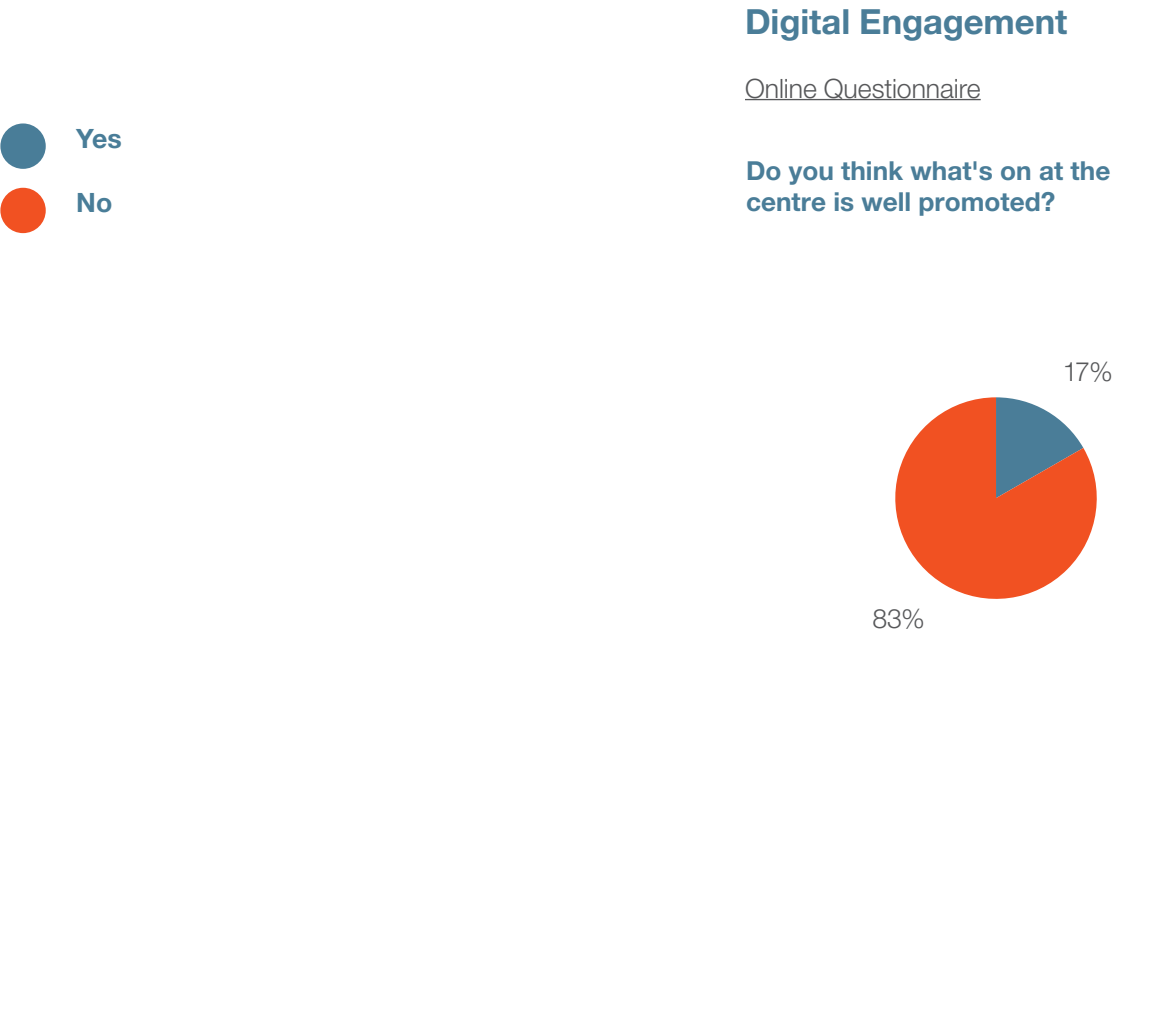


Which of the following are you aware are also based at the Centre?



Do you use any local healthcare services at the Centre?





1 Stakeholder and Community Engagement

1.5 Online Questionnaire

1.5.1 Outcomes

Digital Engagement

Online Questionnaire

What is the single most important aspect of the Centre to you?

The word cloud to the right represents the most commonly used words and phrases in responses to the above questions.

Participants broadly identified specific sporting facilities as core to their interests in visiting the Centre. Central to these are the swimming pools and athletics track.

A number of other facilities were also identified by participants, including diving, gymnastics, the gym, climbing, hockey, volleyball, weightlifting, as well as the nearby skatepark.

The role of the Centre as a community facility was also highlighted by respondents, with its setting within the park and unique scale and range of activities noted as positives.

Activities for children and young people were also repeatedly identified by participants.

The iconic and historic architecture of the Centre was also identified as important to respondents.



1 Stakeholder and Community Engagement

1.5 Online Questionnaire

1.5.1 Outcomes

Digital Engagement

Online Questionnaire

What would make you spend longer periods of time at the Centre, or visit more often?

The word cloud to the right represents the most commonly used words and phrases in responses to the above questions.

Participants highlighted potential improvements and expansion of sporting facilities as the primary drivers to greater attendance.

This included repair and maintenance to some existing facilities, including changing facilities, as well as general modernisation of facilities and improved cleanliness.

Within the context of the wider consultation, participants also noted within responses to this question an interest in retaining a range of particular sports and activities.

Improved catering and social facilities were also noted as a potential draw for attendees, encouraging them to stay around the centre outside of sporting engagements.

Issues which might be of relevance to a future operator included requests for longer opening hours, and improvements to management of popular facilities, including multi-sport courts.



Digital Engagement

Online Questionnaire

To better understand how respondents who live outside of the Greater London Authority area, who are less local to the Centre, make use if it, the charts on this page isolate responses from postcode areas outside of London.

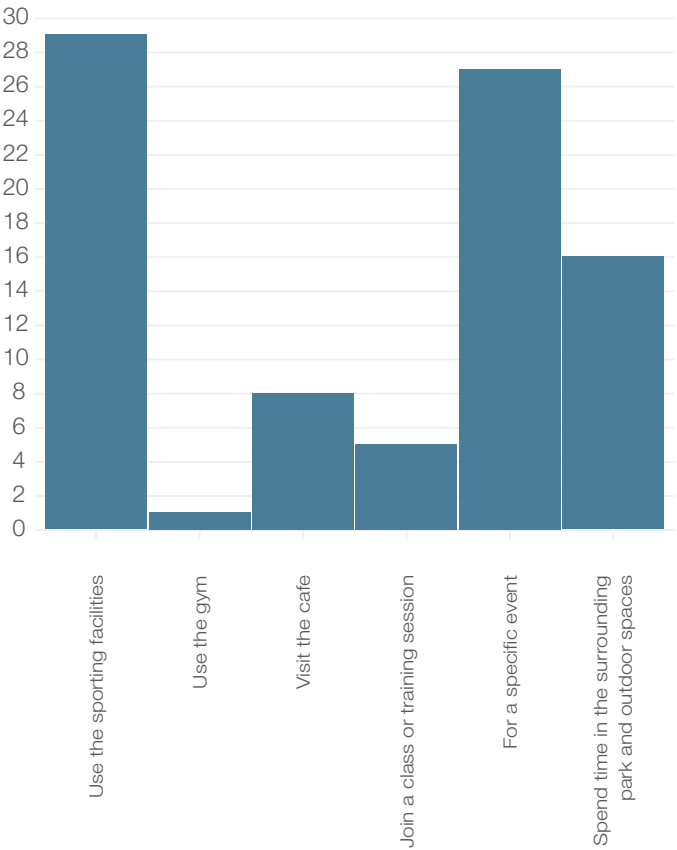
Around 4% of questionnaire respondents were within this category.

As an analysis of responses from this population to the question, “what do you do when you visit the Centre?” the results suggest that those outside of London attend the centre for specific events, and to make use of the sporting facilities, eschewing other activities, or use of outdoor spaces.

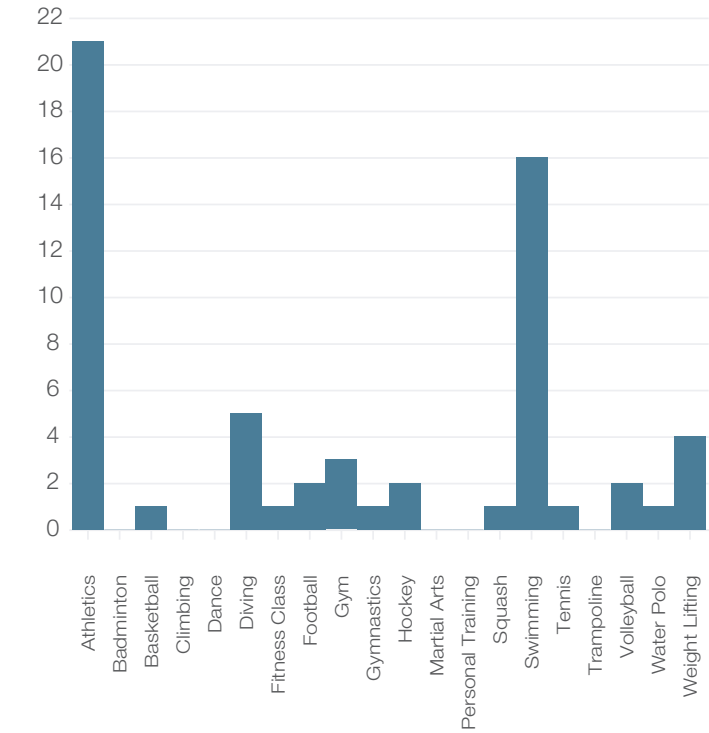
Of this cohort, athletics and swimming were by far the most popular sporting activities identified.

Non-London respondents

What do you do when you visit the Centre?



What sporting facilities do you use at the Centre?



Digital Engagement

Online Questionnaire

The charts on this page offer a comparison between uses of the centre by respondents who identified themselves as members of clubs making use of the Centre facilities or not.

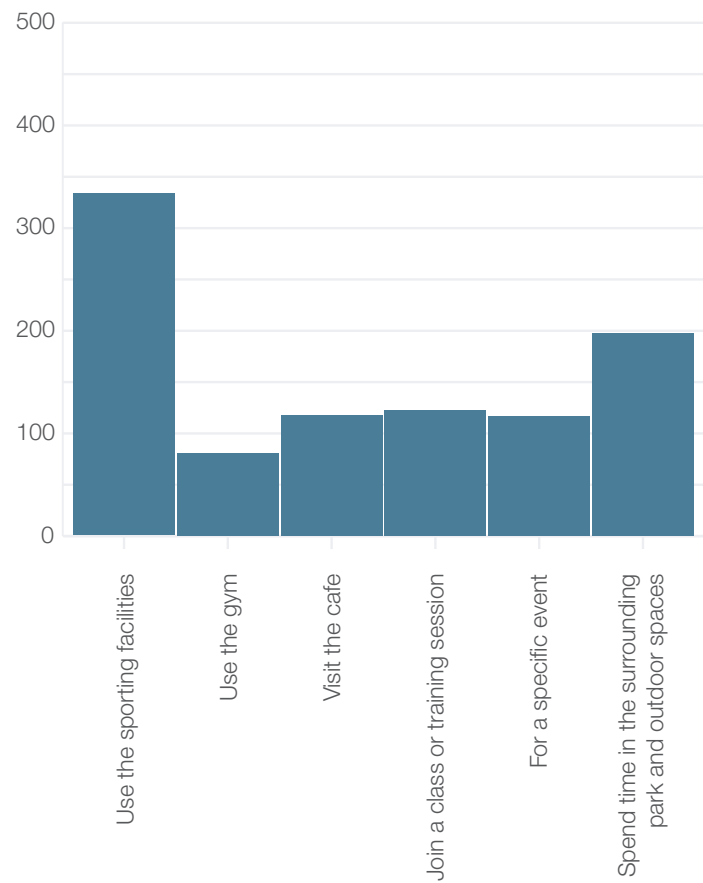
32% of respondents identified themselves as belonging to one or more club.

In response to the question, “what do you do when you visit the Centre?” club members disproportionately selected spending time in the park and surrounding outdoor spaces of the Centre, compared to the non-club members. This was the most significant deviation between the two populations, suggesting that there are opportunities to engage club members in wider opportunities in the green spaces around the Centre.

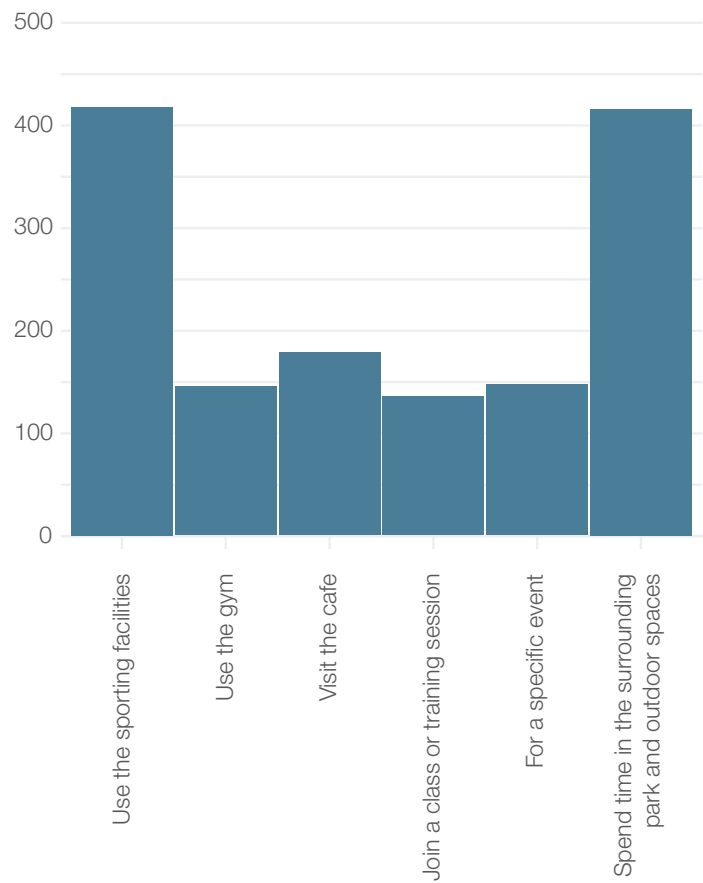
In response to the question, “what sporting facilities do you use at the Centre?”, a significantly higher proportion of non-club respondents identified swimming as an activity compared to club members, as well as use of the gym, fitness classes and climbing. Athletics was disproportionately represented by club members compared to the overall responses.

What do you do when you visit the Centre?

Club member respondents

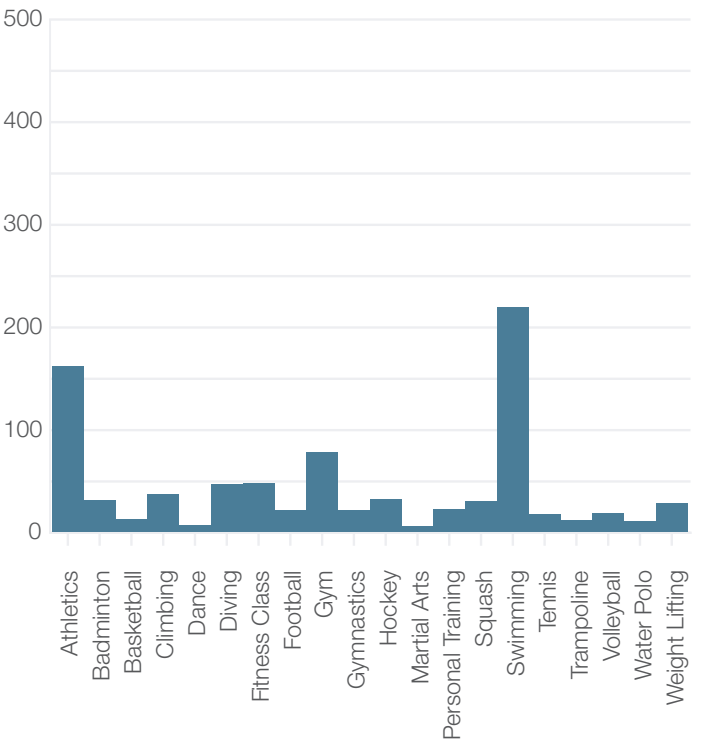


Non-club member respondents

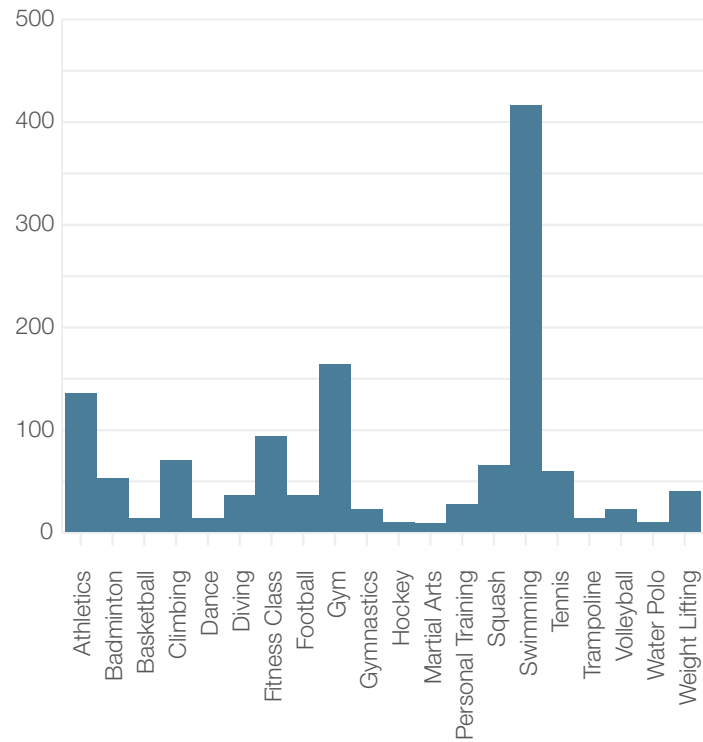


What sporting facilities do you use at the Centre?

Club member respondents



Non-club member respondents

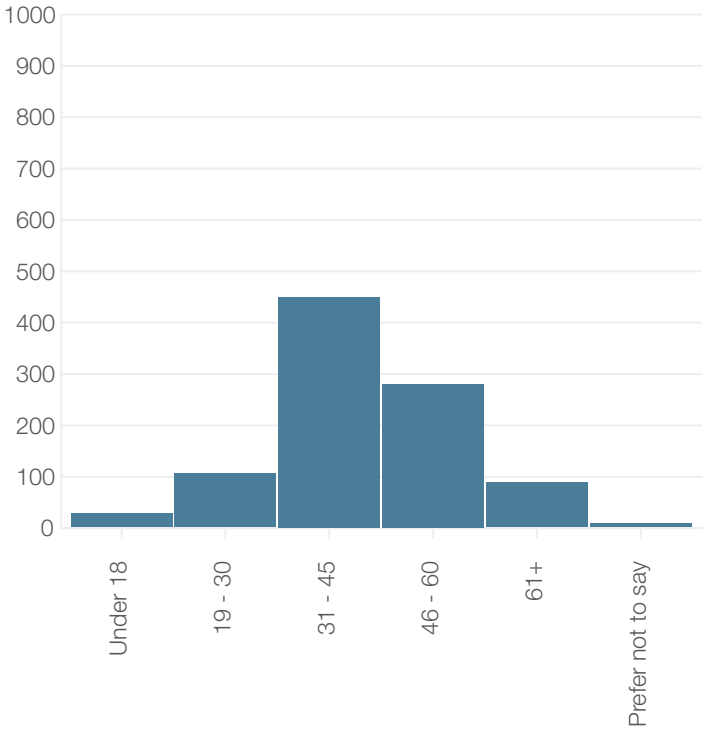


Digital Engagement

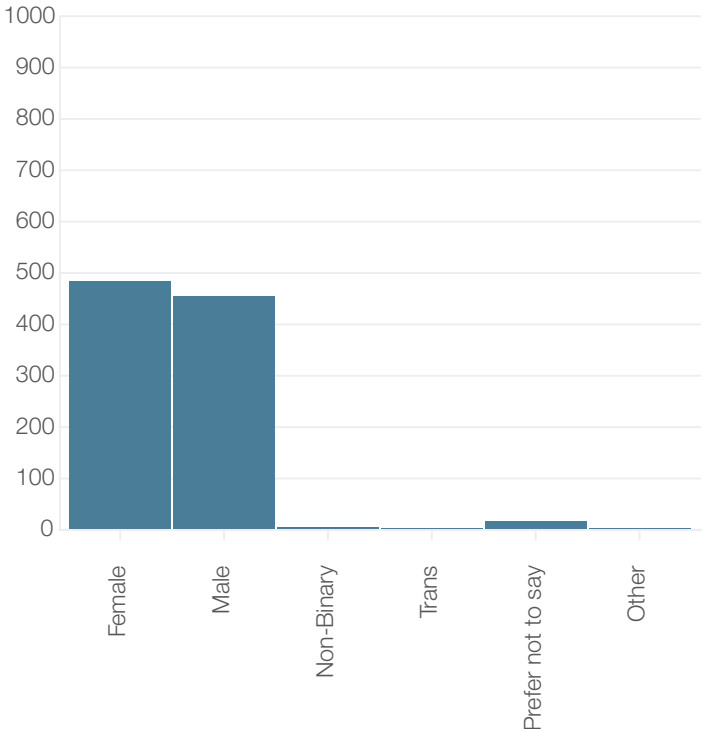
[Online Questionnaire](#)

Demographic Data

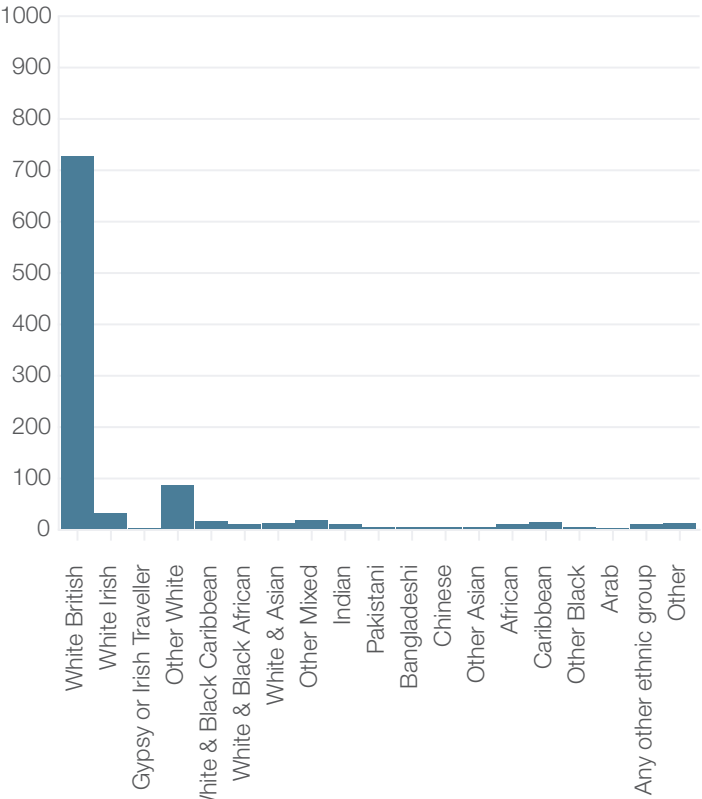
How old are you?



How do you identify?



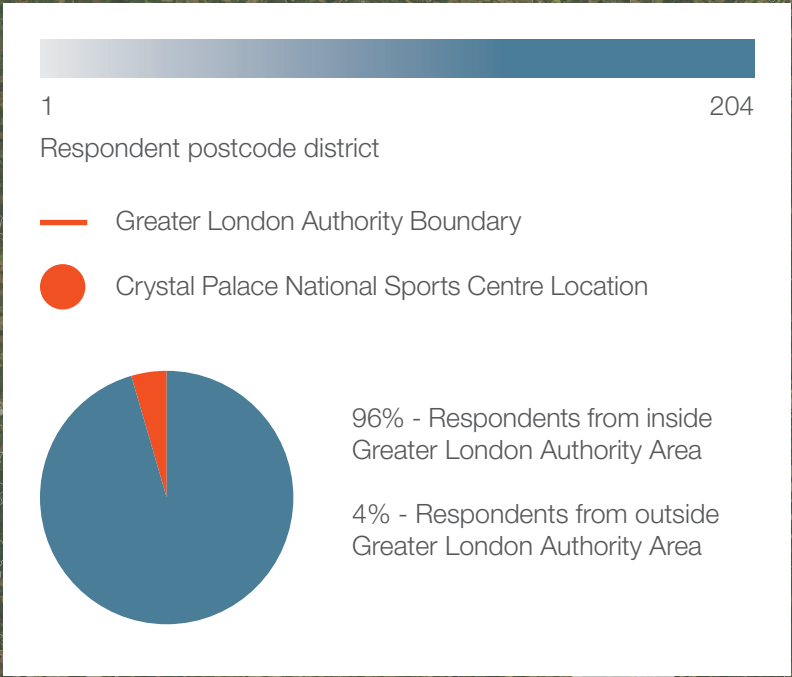
How do you identify?



1 Stakeholder and Community Engagement

1.5 Online Questionnaire

1.5.1 Outcomes



1

Stakeholder and Community Engagement

1.5

Online Questionnaire

1.5.1

Outcomes



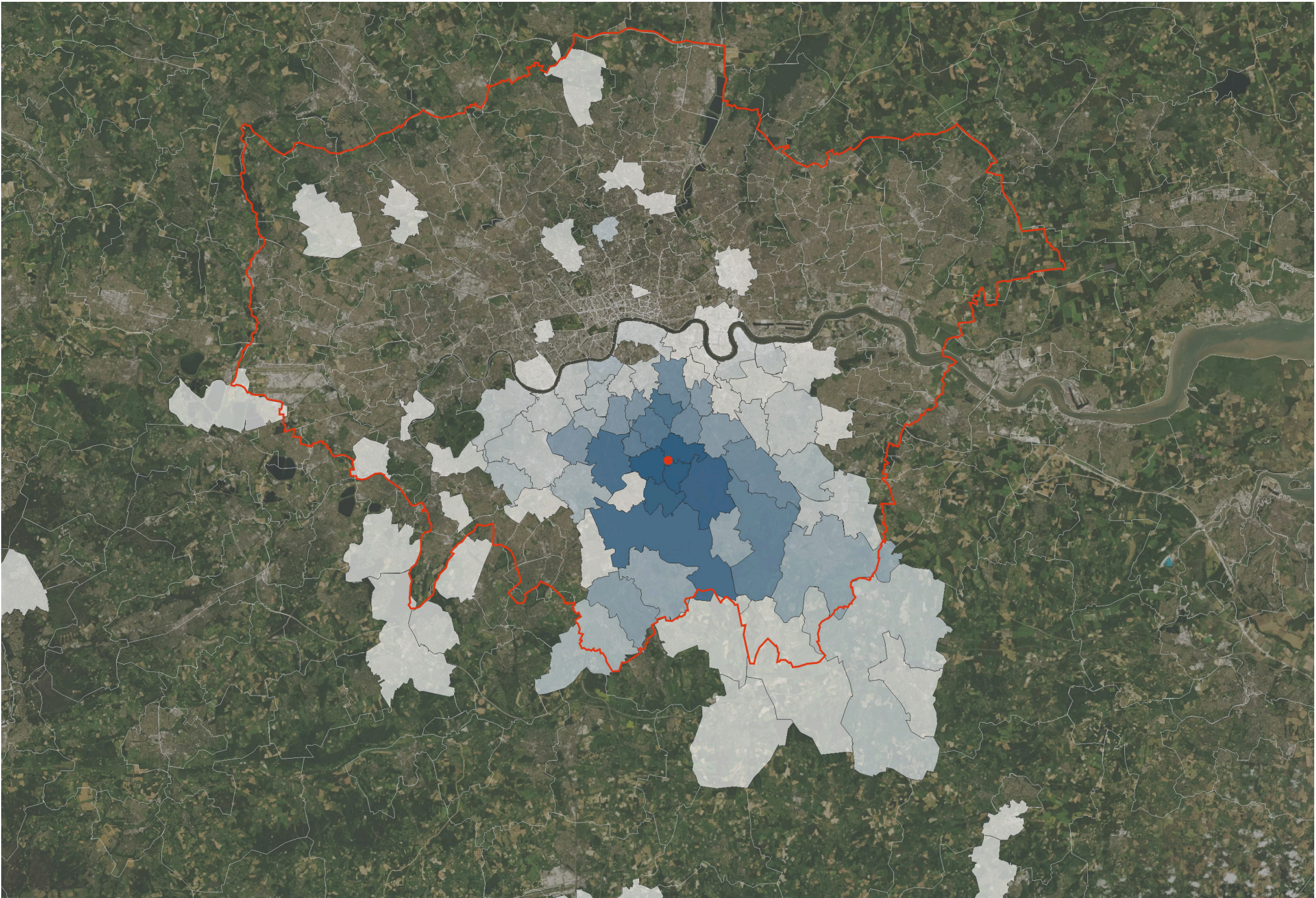
- Greater London Authority Boundary
- Crystal Palace National Sports Centre Location

Respondent postcode district - Greater London Authority Area

BR1	10	N22	1	SE7	2
BR2	12	NW3	1	SE8	1
BR3	30	SE1	2	SE9	2
BR4	5	SE10	2	SM4	1
BR5	2	SE12	2	SM6	1
BR6	5	SE13	1	SW11	2
BR7	3	SE14	1	SW12	4
CR0	20	SE15	10	SW15	2
CR2	5	SE16	1	SW16	19
CR4	4	SE18	1	SW17	8
CR7	1	SE19	204	SW18	2
CR8	6	SE20	92	SW19	2
DA15	1	SE21	14	SW2	8
E14	1	SE22	18	SW20	3
E15	1	SE23	10	SW4	3
EC1V	1	SE24	8	SW6	1
EN4	1	SE25	32	SW8	4
HA1	1	SE26	61	SW9	2
HA4	1	SE27	13	TW1	1
KT2	1	SE3	1	TW12	1
KT5	1	SE4	7	W8	1
N15	1	SE5	2		
N19	3	SE6	7		

Respondent postcode district - Outside Greater London Authority Area

BA15	1	HU15	1	RH10	1
CM8	1	KT10	1	RH8	1
CO9	1	KT19	1	TN13	1
CR5	3	KT21	1	TN14	2
CR6	1	KT22	1	TN16	1
CT10	1	LS5	1	TN18	1
CT6	1	ME13	1	TN4	1
GU15	1	ML1	1	TN9	1
GU34	1	PO21	1	TW19	1
GU46	1	RG18	1		



1 Stakeholder and Community Engagement

1.5 Online Questionnaire

1.5.1 Outcomes

Comparison to GLL membership locations

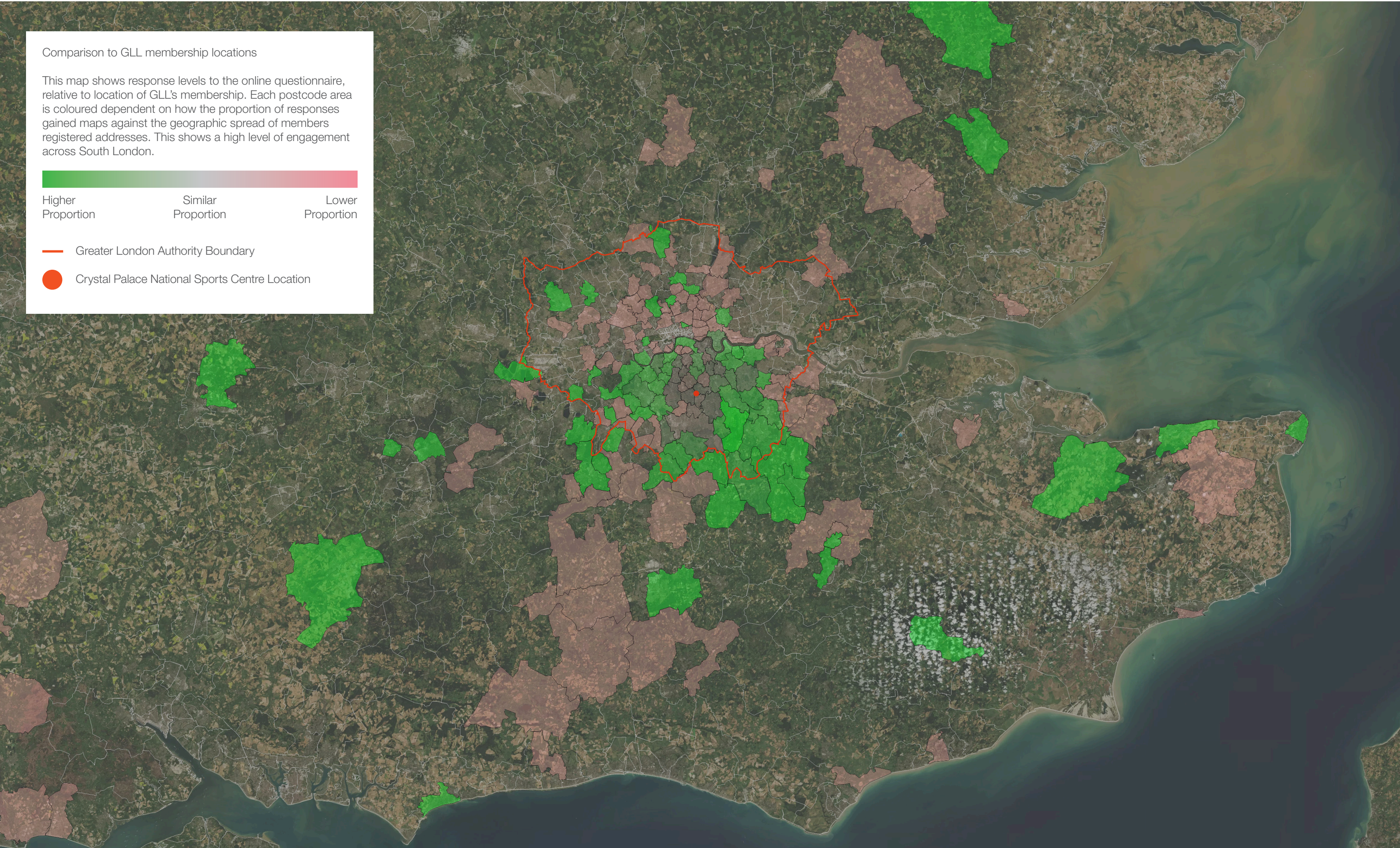
This map shows response levels to the online questionnaire, relative to location of GLL's membership. Each postcode area is coloured dependent on how the proportion of responses gained maps against the geographic spread of members registered addresses. This shows a high level of engagement across South London.



Higher Proportion Similar Proportion Lower Proportion

Greater London Authority Boundary

Crystal Palace National Sports Centre Location



Right

Logic model for basis of engagement through pop-up exhibition

Asset Based Community Engagement

Pop Up Exhibition

Previous consultation has been criticised for not being well publicised or visible. The approach adopted in this stakeholder and community engagement process has been developed to be highly visible and draw attention through curiosity.

To assist in promoting and engaging casual audiences attending the National Sports Centre, Pidgin Perfect created a pop-up exhibition located in the foyer of the main building. This pop-up exhibition was used to introduce users to the project and invite them to provide feedback.

Engagement: The pop-up exhibition uses a bright colour palette and the On Your Marks! visual identity to encourage people to stop and learn more about the project, including when and where workshops, focus groups and events are taking place.

Structure: The structure is constructed of a light weight wooden modular system and cork panels which is used to attach maps and other visual materials.

Voting: For a quick and quantitative response from users we have invited them to vote on simple Yes/No questions based on how they use the Sports Centre.

Audience: This device is suitable for any age of participant and to encourage any level of engagement.

Crucially, the pop-up exhibition will remain in the foyer of the Sports Centre for the remainder of 2018 and act as a base for our team who before each workshop, focus group and event will facilitate feedback from the public using the pop-up exhibition whilst also promoting further opportunities to get involved with the project.

The diagram opposite provides a general logic model for how participants will interact with the pop-up exhibition.

Low Level Engagement

Medium Level Engagement

High Level Engagement

Passers by 1-3 minutes

Peaked curiosity 3-5minutes

Committed Interest 5+ minutes

The freestanding engagement tool is designed to allow for low to high level engagement with the public.

ALL PARTICIPANTS-

1 From a distance the engagement toolkit visually invites people to approach the object. Clear signage will tell people to vote and tell us what they want for the future of the sports centre.



ALL PARTICIPANTS-

2 Can take part in voting for fast response YES/NO questions.
For a quick and quantitative response from users we are inviting them to vote on simple Yes/No questions based on how they use the sports centre.



Do you use the Sports Centre regularly?

Are you happy with the amount of events and activities?

Are the facilities suitable for your sport?

Is this centre your main location for sport/fitness?

Which sport facilities do you use at the centre?

3 Visitors who want to contribute more will be able to map out assets/their most used features in the sports centre and pin small written postcards to the map with specific areas of interested/places they would like to see improved

This encourages the visitor to give us more information about how the building is used by the public.



4 Participants who have would like to engage more with the project will be given larger postcards to give general comments on what they wish for the future of the sports cente.

These will be posted in a 3D mascot model who which will be kept at the centres reception throughout the project with extra postcards.



Every person engaging will be given a postcard to take away with the website and online questionnaire URL, a small intro to project & printed Mascot prcture.

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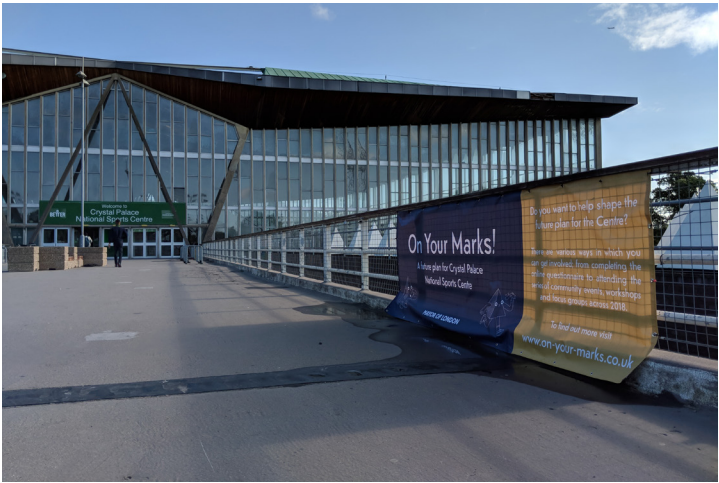
Stakeholder and Community Engagement

1.6

Pop-up Exhibition

Images

The pop-up exhibition and signage, located in the foyer of the Main Building.



1

1.7

Stakeholder and Community Engagement

Asset Based Community Engagement

Top Right
Coached by the Community
workshop session on Wednesday
5th September

Bottom Right
Coached by the Community
workshop session on Tuesday 4th
September

Asset Based Community Engagement

Coached by Community Workshops

Conversations with the GLA and key stakeholders including Crystal Palace Sports Partnership and Crystal Palace Trust highlighted competing agendas and priorities across a wide ranging and complex set of stakeholders.

With this in mind, it was deemed of critical importance to front load contact time with stakeholders to work towards the creation of an overarching philosophy for the Sports Centre that could be demonstrably embedded into the options for the future.

A fuller understanding of the needs and aspiration of users from various backgrounds was developed through the delivery of four asset based community engagement (ABCE) workshops targeted at key and invited stakeholders. They aimed to build an understanding locally of what the public considered the Sports Centre to provide in terms of assets and values, and what the priorities for the facility and the community were moving forward. During ABCE Workshops, information on existing uses, and ideas for the future were explored through a range of creative activities.

Under the title of ‘Coached by Community’, the ABCE Workshops were widely advertised with specific dates targeted at particular audiences.

The ABCE Workshops were held on the following dates and times in the Paxton Suite at The Lodge, Crystal Palace National Sports Centre:

Friday 24th August (Pop-up Engagement) :	5-8.30pm
Saturday 25th August (Pop-up Engagement):	8am-1pm
Wednesday 29th August:	6.30-8.30pm
Thursday 30th August:	6.30-8.30pm
Tuesday 4th September:	7.00-9.00pm
Wednesday 5th September:	7.00-9.00pm



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Stakeholder and Community Engagement

1.7

Asset Based Community Engagement

1.7.1

Outcomes

Below
Coached by the Community
workshop session on Tuesday 4th
September



Asset Based Community Engagement

Coached by Community Workshops

Workshop Format

All four workshop sessions followed the same format and made use of the same suite of tools and activities.

This began with an introduction and presentation from Pidgin Perfect, outlining the purpose of the sessions, and how they sat within the wider Feasibility Study project.

This was followed by an introduction to the project context, developed by the GLA. This set out the client’s ambitions for the National Sports Centre and provided information on previous consultation that has taken place.

The workshop participants were divided into groups of around six to eight people and worked through a series of short activities designed to capture their experiences of the Centre and ideas for its future.

Responses

A summary of some of the key issues is included below. A more thorough breakdown of participant responses is included as an appendix to this report. Common participant responses included:

- A strong preference for enhancement of a multi-sports Centre
- The need to deal with long-standing maintenance issues around key Centre facilities, including the Main Building roof, and changing facilities across the site
- Interest in exploring new activities on site, including enhanced food & drink facilities, as well as music and outdoor events
- A strong interest in building better connections between the NSC site and surrounding Crystal Palace Park

The Main Building

Participants raised current maintenance issues, including the roof. There was support for separating the wet and dry facilities within the building. The need for upgrades to changing facilities was highlighted. Improved way-finding and social facilities were also suggested.

Athletics Track and Stadium Seating

The need to retain the track was paramount. Opinions were split on the retention of the existing seating provision. Some respondents suggested the use of the bowl for non-sporting events to generate income, while others suggested a reduction of permanent seating to reflect analysis of sporting use. Better integration of the track and seating into the wider park, and improved access were highlighted.

Walkway / Indoor Athletics

There was a strong preference for maintaining an indoor track as part of the Centre in the future, with a mix of opinions on retaining the current building, or replacing with a new facility. Issues with the state of the current facility were highlighted. There was broad support in retaining the walkway, but issues for pedestrian access were raised.

Route from Train Station

The lack of a clear and safe route from the train station was highlighted by a number of participants. This included the lack of appropriate lighting. Better use of desire lines linking the facilities to surrounding transport options was highlighted.

Parking

A need for an appropriate level of parking on the NSC site was identified by participants, with an emphasis on disabled parking spaces and the need for flexible parking to accommodate larger occasional events.

Hospitality/Social Space

A number of participants highlighted the need for a social and hospitality space to serve the Centre, beyond the existing cafe facility. This was suggested to serve both the Main Building and surrounding facilities.

Sporting Heritage

The significant and long history of the Crystal Palace as a location for sport and competition was highlighted as a significant asset. Ways to memorialise and celebrate this heritage were suggested as a valuable to any future development.

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1.7

1.7.1

Stakeholder and Community Engagement

Asset Based Community Engagement

Format

Asset Based Community Engagement

Coached by Community Workshops

Workshop Format

All four workshop sessions followed the same format and made use of the same suite of tools and activities.

This began with an introduction and presentation from Pidgin Perfect, outlining the purpose of the sessions, and how they sat within the wider Feasibility Study project.

This was followed by an introduction to the project context, developed by the GLA, and delivered either by one of their representatives, or the Pidgin Perfect facilitator in their absence. This set out the client’s ambitions for the National Sports Centre and provided information on previous consultation that has taken place. Participants were instructed that no questions would be taken at the beginning of the session, so as to maximise time to run through scheduled activities. Instead, each participant was invited to record any questions that they had arrived hoping to discuss on a ‘Hard Questions Postcard’ and informed that these would be returned to as part of a question and answer session at the end of the workshop.

The workshop participants were divided into groups of around six to eight people and worked through a series of short activities designed to capture their experiences of the Centre and ideas for its future.

Current Activities

The first workshop group activity involved participants looking through a deck of cards, each showing activities that currently take place in and around the Centre. Participants were invited to take cards of relevance to them, and to use those selected as the starting point for completing an accompanying worksheet. This worksheet asked participants:

- What’s your favourite memory of taking part in this activity at the Centre?
- What makes the Centre a good place to take part in this activity?
- What problems does the Centre have, that make this activity less ideal?

- What would encourage you to take part in this activity more often at the Centre?

Participants were encouraged to discuss answers to these collectively, and to record key points on the worksheets, building a better understanding of perceptions of pre-existing positives and negatives associated with the facilities.

Future Activities

Next, participants repeated this process with a second deck of cards, this time identifying a range of potential future activities that might take place in or around the Centre. Another worksheet asked a different range of questions:

- Describe the activity; How many people would be involved, what time would it take place etc.
- What new audiences would this activity bring to the Centre?
- What existing or additional facilities would you need to make this new activity happen?
- How could you or your club be involved in helping make this activity happen?

Key Buildings and Spaces

As a tool to better explore and understand some of the key architectural features of the National Sports Centre site, the next activity involved the groups responding to a worksheet which provided summarised information on some of the issues which will drive development considerations. This included information on underlying development issues and potential routes of exploration for the design team.

Participants were invited to read through these summaries, and respond to the following questions:

- How do you or your club use these facilities currently? What are your reflections on them?
- Given the above information, what changes do you think could contribute to a more secure future for the NSC?

Maps - Understanding access and the wider NSC site

The final group activity made use of large format satellite photograph mapping of the NSC site, identifying the boundary of the project site, and highlighting existing key access routes

within Crystal Palace Park. Participants were invited to discuss their experience of making use of the site, and issues with its current layout. These were noted on the maps using sticky notes and drawings. Emphasis was placed on highlighting and exploring issues with vehicular and pedestrian access, as well as beginning to explore how alternative layouts of facilities might allow for some of the aspirations noted in previous activities.