



Crystal Palace Community Association

CPCA



LB Bromley
Civic Centre
Stockwell Close
Bromley
BR1 3UH

5 October 2009

Dear Sir

**CHANGE OF USE FROM BINGO HALL (CLASS D2) TO CHURCH/COMMUNITY USE (CLASS D1) TOGETHER WITH ANCILLARY OFFICES, CAFE AND BOOKSHOP AT 25 CHURCH ROAD, UPPER NORWOOD, LONDON SE19 2TE
REF: 09/02202/FULL1**

As a group with an interest in local amenities, the CPCA wishes to make the following representations of objection to this application on behalf of the many representations received from its membership on this matter.

1. The area in which the application site lies is statutorily designated as a District Centre. Moreover, this area is particularly characterised by its cross-borough linkages where the complexion of the area and the impact on relative interests conferred by any one borough on adjoining boroughs need to be very carefully considered. This single existing D2 use designation for the application site and its operation within its overall context is crucial to the nature and character of this area, and any erosion of it would seriously undermine the economic interests and vitality of the shopping centre.
2. The site is within the Crystal Palace Park Conservation Area, and borders the Upper Norwood Triangle Conservation Area, which is itself bordered by 6 other conservation areas, again in the borough of Bromley, and also in Lambeth and Croydon.
3. Whilst there is evidence of the complementary nature of the type of use proposed within shopping centres, there is no evidence that such D1 use is harmful, but neither are they positively beneficial as is being claimed, to the retail character or function or to the trade of A1 outlets by their presence. They would attract no additional customers or visitors to the shopping centre to promote and increase trade in the area. We take a contrary view and say that such use would confer no medium to long-term benefit to the Triangle as a retail area, nor is it likely to be particularly

beneficial to the community. There is no study which seeks to analyse and evaluate use in the centre and which confirms a demand for another church. In the light of changing uses that are occurring in the area and the obvious consequent decline in the character, nature, vitality and economy we do not consider D1 use as appropriate.

4. With the presence of seven other churches in the vicinity of the application site we consider the area to have already reached saturation level, or, at least, bear a significant concentration of such uses. Such use as is proposed would result in the loss of a community facility of the type that is genuinely and appropriately desirable and demanded in the shopping centre, and offers nothing to positively stimulate and encourage the younger sector of the community. We note, with ever-increasing alarm and concern, a number of recent applications in the locality for change of appropriate extant uses, especially A1 (retail), to alternative and inappropriate uses. The balance of uses is becoming so one-sided that it is having a detrimental impact on the nature and character of the area.

5. The Transport Assessment reckons on a car usage of 20%, though this is not site specific, it having been derived without justification from another incomparable site, although this is employed to advance the justification. However, the proposed car parking provision is not based on objective assessment. An additional 50-60 cars for a congregation of 500-600 is a 10% demand. Moreover, public transport on Sunday from outside the locality is unreliable. Reference to the Planning Inspector's report of KICC's planning appeal in Havering directly refers to a study undertaken on the travelling behaviours of the congregation, which suggests a car usage of 66%. Applying the same formula to a capacity use level results in an additional car demand of 300. In practice this is unlikely, but the point is that neither is the modest 50 number indicated in the TA.

6. There is clearly inadequate car parking provision on site and the car parking arrangements on the main roads of the the Triangle are not satisfactory to serve the needs of the Church as they propose. Car parking will, therefore, migrate to surrounding streets with consequential parking stress. The parking stress prevalent in the area as a direct result of an influx of congregations attending Sunday church services at the Queen's Hotel further along in Church Road is typified by the recent reports of the attendant chaos and harm through obstruction of emergency vehicles, that the Council's are obliged to put on extra traffic wardens t patrol the area. The proposal to use Crystal Palace Park for parking provision to serve the Church is wholly inappropriate since it has not been accounted for in the CPP Masterplan and discriminates against the other traders and uses in the locality.

7. The building is the only one in the local area of its size of Use Class D2 for a large scale leisure facility, the loss of which would erode the mix of types and uses in the area and result in the loss of entertainment for residents of all ages. This is contrary to the UDP in the following respects:

- Policy C1 which states: *"Planning permission will not be granted for proposals that would lead to the loss of community facilities unless it can be demonstrated that there is no longer a need for them or alternative provision is to be made in an equally accessible location"*

- Policy 13.9 which states: *“This policy is intended to protect existing community facilities and the loss of such facilities will be permitted only under the circumstances stated in the policy. This policy also seeks to promote the provision of developments that would meet the current and future health, education, faith, social or other needs of particular communities or areas of the Borough. This policy seeks to ensure that appropriate provision is made of land and buildings to meet the current and future needs of the community generally and of specific community groups”*
- Policy 9.8 which states: *“The Council recognises the role that leisure, recreation and the arts can play in the life of the Borough. Among the Council’s key aims, as set out in ‘Building a Better Bromley 2005/08’, is the requirement to sustain and further enhance the arts, sports, play and childcare programmes. In so doing, the Council will draw on its own strategies for parks, sport and the arts, and will work with partners and funding agencies to promote major improvements in Crystal Palace Park (including the National Sports Centre), at the Churchill Theatre, and in libraries, sports and parks.”*

Policy S5 allows for change of use to other uses including provision of local services/community use. However, the proposed users are not drawn from the local community but come from various parts of the South East of England and are unlikely to offer much, if any, extra business to the local traders.

8. The DAS states that:

- the proposed use will help meet the health, educational, faith, social service and other essential needs of the community
- the proposed use will help the Council in meeting its obligation to maintaining and enhancing the availability and accessibility of a wide range of community facilities which contribute to the quality of life of the Borough’s population

However, it is clear that the new D1 use is restricted to communities outside of the Crystal Palace area and not drawn from the Borough, and is most unlikely to meet any of the needs of the local community. The application contains no information, analysis and evaluation of how this is to be achieved. There is no appreciation of the nature of the location of the site or an understanding of the particular relationships in a cross-borough area. The claim being advanced that a single borough’s population will be enhanced is not justified and leads without due consideration of potential detriment to another.

9. D2 use has provided employment potential and was an integral part of the economic regeneration of the area since users were drawn from the local community. Retaining the D2 use for leisure use would allow it to act as an anchor to attract further investment in the district centre and bring forward the regeneration of the wider Upper Norwood area. No case for benefit is made by the applicant for D1 use, whose interest rests solely with gaining permission for his own operation, which, incidentally, confers no additional employment or economic benefit, rather it would erode the employment opportunity and contribute to the decline of the economy of the area.

10. KICC claims to having consulted with the community are misleading. In fact, it has not consulted with the local community, which would be expected on a controversial proposal that claims to confer benefits on the locality. There is no effective analysis or understanding of the particular social nature and mix of the area to justify embedding a need and place for the new use.

In conclusion, the CPCA is of the firm opinion that such use at this time would be detrimentally in conflict with the retail and commercial function and economic regeneration of the shopping centre and strongly objects to the application.

Yours faithfully

Don Bianco
CPCA, Planning Sub-committee