

1. This application and the parallel application for conservation area consent (for which I do not have a reference number) are for the relocation of the principal entrance gates to Brockwell Park, repositioning of the boundary fence/wall, demolition of the public lavatories and the realignment of the road junction. I have given extensive pre-application advice in this case, although it is not entirely reflected in the application.
2. Brockwell Park is a listed historic landscape and conservation area, and the historic landscape setting for the grade II* listed mansion house. The junction of Dulwich Road and Norwood Road is currently an unattractive and unsympathetic setting for the park. The road junction is very wide, hard to cross and cluttered with poor quality street furniture and worn out surfacing and kerbs.
3. The improvement of the junction is strongly supported in principle, along with the associated public realm improvements by Herne Hill Station, and this is reflected in UDP Policy 67. It is accepted that some loss of the parkland- at least at the north end of Norwood Road- may be necessary to allow for a traffic lane and footway of adequate width there. Any such a re-alignment of the road would also necessitate some relocation of the Park boundary.
4. PPG 15 (particularly 3.19 and 4.27) and UDP policies 47, 49 & 50 also apply here. All of these policies support the retention of the extent, character and appearance of historic parkland as far as possible.
5. The scheme submitted will have a significant impact on the park and its setting. The gates that will be affected form the main entrance to the park and the start of the historic route through the "idealised" landscape up to the mansion house. The proposal cuts off the projecting corner of parkland which was the historic entrance to the park when it provided the setting to two 19th century villas. It requires the removal of several trees. In order to re-provide adequate pathways and vehicle access within the park an area of grass land roughly equivalent to that lost to the road way will need to be asphalted. It also creates a much larger traffic island- immediately in front of of the main entrance to the park- at what is already a very wide junction.
6. In this context the key consideration is whether the specific road alignment proposed "is essential" to achieve the necessary traffic and environmental improvements. By the same token I infer that if the traffic and environmental improvements could be achieved without the loss of historic parkland, or with a smaller loss, this would be preferable in policy terms.
7. The gates themselves and the surviving railings of c1900 make a positive contribution to the park and conservation area. The application refers to their refurbishment and extension. It is not entirely clear what is proposed in this respect. The boundary is quite complicated with significant variations in level along the length affected. The yellow brick walls are not of special interest and there is no objection to their removal.

Full details of the whole boundary treatment should be provided. The details of the planting and resurfacing within the Park are also very vague, although this could be dealt with by condition.

8. The mid-twentieth century WCs are not of special interest and there is no objection to their demolition. However acquiescence to their demolition should not be taken to mean that either the loss of the facility, nor its re-provision else where within the historic park, is supported.
9. The impact on the character and appearance of the historic landscape is also significant. The projection of the park into the road junction has both a visual and a practical function. The northern edge of the park is a buffer zone between the noisy, polluted and heavily used roads and the calm green space of the park. The present gates- the point at which urban environment and parkland meet- are on the outside edge of this boundary zone, so that the driveway is as long as possible and impact of the road on the park is minimised. The natural sweep of the driveway- and the view from the house- terminate naturally at the level area by the gates. Pulling the gates back into the park and effectively ending the drive at the lower end of the slope is a loss not only in terms of space, but of vista- instead of the eye being drawn down the drive to the gates it will now be drawn to the bleak, hard surface of the new traffic island. These reasons of character and visual amenity- especially important significant in an historic park- emphasise the importance of keeping the loss of parkland to a minimum.
10. In urban design terms, I question the desirability of creating - or even retaining if there is an alternative- a large, featureless, wholly paved traffic island, bisected by the bus lane. There appears to be no defined or protected crossing point on the bus lane in place of the current controlled pedestrian crossing, and the traffic island is not railed. However since the speed of the buses immediately outside is likely to increase given the new road layout this is surprising. The absence of clutter is welcome, but confirmation should be sought that this arrangement meets current safety standards, since the post hoc installation of railings could seriously diminish the quality of the public realm here.
11. Moreover, unlike a paved area outside a shop or pub, for example, it seems unlikely that this space will be used for pleasure- it is "dead space" of the sort that good urban design practice aims to avoid. While I cannot comment of the highways issues, the quality of urban design here is disappointing. The design statement does not really provide a rationale in any other terms than highways functionality. I am unclear whether the submission reflects the input of specialist urban designer. In any case larger scale more detailed drawings should be submitted.
12. I am also unclear about whether it is viable to retain the existing tree on the traffic island. Advice should be sought from Ian Leonard in this matter.
13. I am not qualified to advise on technical highways matters, but given exceptionally high level of local interest

in this scheme it is essential that independent expertise is brought to bear on this issue. I would note that a design that did not require any loss of parkland, nor created an enlarged traffic island was presented to the Herne Hill Forum, (the community-led steering group to which the council has given responsibility for this project) by Transport for London's Urban Design/Heritage team some months ago. I am unclear whether this is "Option D" to which the application refers, but it was my understanding that this option was not fully worked up. (Contact Anthony O'Keeffe anthonyokeeffe@tfl.gov.uk at TfL; Steve Tomlinson steve.tomlinson@designforlondon.gov.uk tel: 7593 8390 at Design for London.

14. In summary, independent assessment of the options appraisal submitted and of any other design solutions, should be sought from a suitably qualified highways engineer.

15. A number of other issues have been raised in relation to this case which I suggest should be reported. You will doubtless be aware that the Council is currently seeking a major (c£5 million) grant for the park from HLF. It is important that members are aware of the views of Stewart Harding (HLF project monitor) which I understand have been provided in a letter to Robert Overall. I would also draw to your attention the views of the Lambeth Parks manager Shaun Kiddell who is better placed than I to comment on the practical issues relating to access, especially when major events take place in the Park.

16. In summary, the alignment of the road must be determined by Highways specialists briefed to design a scheme that balances the necessary improvements to traffic flow against the policy requirement to minimise loss of parkland. When this is clear, I have no doubt that an high quality treatment for the public realm and the landscaping of the park can easily be agreed.

Michael Copeman