Dear Mr Beadle,

Response to consultation on the future of the National Sports Centre

I am writing to submit a collective response to the consultation on the National Sports Centre and Crystal Palace Park, on behalf of Green Party members living in this part of Bromley, Croydon, Lambeth, Southwark and Lewisham.

Process

We feel that the consultation period is too short. We are grateful that it has been extended, but support the suggestion of Bromley Council that it be extended to the end of February. The consultation seems to be rushed to meet the timetable of the Crystal Palace Free School, which has promised potential applicants it will be in a position to receive pupils in September 2015. We cover our views on the school proposal below, but you must not damage the rest of the park in a rush to get this through.

While the notices on the entrances to the park are an improvement, there has not been enough notice of the public events, and there is little or no sign of marketing for this proposal in the local shopping districts.

So far as we know, there was very little engagement before the consultation was published with local community organisations like the Crystal Palace Park Community Stakeholder Group, the various Crystal Palace area campaign groups, the putative Neighbourhood Forum for the area, the Chamber of Commerce, local councillors, interested and constituency Assembly Members or MPs. What ongoing engagement there
has been doesn't seem to have translated into the proposals, which have clearly upset a lot of people both in detail and the timeline for their implementation.

Our biggest concern is that the proposed options break with the masterplan for Crystal Palace Park, both in landscaping detail and in the inclusion of a primary school where there was previously to be a grassed amphitheatre surrounding the athletics track. That masterplan, while not perfect, took many years and a huge amount of public engagement and debate to arrive at, and shouldn't be so easily cast aside by this and other projects the GLA is working on.

The options presented are very narrow. There should be at least one option without a primary school, and more thought given to alternative future uses for the athletics facilities.

We fully support the letter from Darren Johnson, Green Party Member of the London Assembly, calling for you to release the full options appraisal. This would be transparent, enable local people to really understand the basis for your proposals, to understand and scrutinise why you believe the 'do nothing' option is not viable, and to have the information from which to develop alternatives.

The future of the NSC also needs to be considered in light of the park as a whole. You should be working with Bromley Council to establish a Community Trust to manage the entire park, and consider transferring ownership of your section of the park to this Trust. The Trust could use the options appraisal and other information you and Bromley Council hold to develop a business plan taking account of the costs and revenues associated with all the facilities - the NSC, lodge, transmitter tower, cafe and concert bowl, Capel Manor College, one-off events such as triathlons and fireworks displays, and so on. The Trust could ensure this business plan builds on and implements the masterplan to develop a coherent and improved park.

The Trust could also ensure that their priorities align with those of local residents and the users of the various regionally important facilities. For example, the council has recently decided to cut the Park Rangers service and there are many small improvements that could be made to the footpaths, fences, gates, speed bumps and so on to make the park

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more permeable for people on foot and bike. These, rather than such Grand Projects as
the GLA is proposing, need better attention.

**Provision of a free school**
While the Green Party does not support Free Schools, we do recognise the need for more
school places in the area and the limited options our local councils have to provide them.
We also acknowledge the care that the founding group has put into avoiding many of the
problems with the Free School policy, and the breadth and depth of their expertise in the
educational sector. So we would welcome plans that would provide a site for this new
school in the local area.

However, we oppose the current proposed site in the middle of the park. We do not think
this is an appropriate use for public parkland, nor a suitable and safe place for children to
be walking to and from a primary school.

We are also concerned that it could further add to the traffic and congestion in the area
due to its distance from much of the catchment area. Over the summer we conducted a
study using diffusion tubes and found nitrogen dioxide levels at twice the legal limit on
Crystal Palace Parade, and well above legal limits on other main roads near the park.
There are other more walkable sites in the area.

**Impact on the park**
The new access road from the fisherman’s gate will disrupt walking routes in a park which
is already fragmented by previous inappropriate developments. The masterplan tried to
create a more cohesive feel to the park, but while some aspects of your proposal such as
restoring the central axis will help, the new access road will make it worse.

With the additional proposed hotel and retail development the the top of the park, this
proposal removes yet more parkland from public access and leisure use.

Moving the tennis courts will result in the loss of trees which do not seem to be replaced
in the plans. There are doubtless other impacts on the flora and fauna in the park, which
should be properly studied and avoided.
Loss of sports facilities

The athletics facilities are one of a kind in south London, and are an important part of south London’s Olympic Legacy. In 2012, welcoming the Brazilian team to the area, Boris Johnson said “Crystal Palace is a world renowned centre for sporting excellence”.

We also note that the NSC and the various facilities in the main building and the Jubilee Stand are major employers and a tourism draw for the area.

The masterplan proposed downgrading the sports facilities from national to regional importance. Your proposals don’t adequately explain why you think they should be downgraded further to only being of local importance. As noted above, it is not acceptable to make such a dramatic change and keep options appraisal - and the brief given to CSM consultants who produced it - secret.

We understand that the methodology used to assess the level of usage was flawed. We have met young athletes who train on the tracks by slipping through open gates who wouldn’t have been counted by CSM, and who were outraged at your proposals.

We fully support the petition organised by the Crystal Palace Sports Partnership requesting that they are better engaged in this process.

Joining the dots

This proposal is one of a number of disjointed pieces of work that the GLA is undertaking for the area. There is also:

- the plans from the ZhongRong Group (ZRG) to build a large commercial development on the park hilltop and its important natural habitats ‘in the spirit of’ the original Crystal Palace, involving the sale on a long lease of a large area of public park land
- your proposal that the wider area be designated a Strategic Outer London Development Centre in the Further Alterations to the London Plan, a proposal which has been shrouded in mystery since it was included in the draft alterations
- the short-term improvements to the park that you are part-funding following the collapse of the Heritage Lottery Fund bid, some of which, as Bromley Council has pointed out, would be undone by your NSC proposals

2 https://www.change.org/p/the-greater-london-authority-save-athletics-and-sport-at-crystal-palace
• the study you commissioned to look at regeneration opportunities in some areas adjacent to the park; we note that the brief has again been kept secret, and that the connection between this work, the ZRG proposals, the SOLDC status and the proposals for the NSC are unclear, causing confusion and anxiety locally

• and TfL’s possible long-term aspiration to extend the Tramlink to the area, which the Mayor has repeatedly promised but which remains absent both from TfL’s business plan and the Mayor’s Infrastructure Plan up to 2050

We are concerned that proposals such as those for the NSC are now being shaped with a view to facilitating the ZRG building on the hilltop in the park, hence the variation from the masterplan, the secrecy and the unseemly rush.

The GLA does not appear to be ‘joining the dots’ between these different proposals, to build on the masterplan and further develop a coherent vision for the local area.

The Crystal Palace community wants the GLA to be actively involved in the area, supporting initiatives such as the Neighbourhood Forum in order to overcome some of the problems which we face living on the borders of five boroughs.

There is a strong desire for bringing regeneration to the area, but not through Grand Projects and sham consultations that ignore or trample over what is already here. This consultation, on top of the shambolic and shameful ZRG proposals, is squandering that opportunity and turning positivity and goodwill into fear and enmity towards the GLA.

**What we are asking for**

We call on the GLA to:

1. Expand the timetable for consultation until at least February 2015, to include a much broader range of proposals, and to properly engage with the Crystal Palace Sports Partnership, the Crystal Palace Park Community Stakeholders Group and other local stakeholders in an open dialogue about the future of the NSC, the park and the wider area.

2. Support the establishment of a Community Trust and a Neighbourhood Forum, and support them to take the lead in developing plans for the NSC, the park, and a long term vision for the Crystal Palace area and neighbouring places including
Anerley and Penge.

3. Publish the full options appraisal and the brief given to the consultants that produced it.

4. Publish any communications you have had with the school which highlight other potential sites for the school.

We hope you can take on board our concerns and like us, you aspire to a full and inclusive, informed consultation that will involve as many members of the public as possible.

Looking forward to hearing from you,

Yours faithfully,

Rachel Chance
On behalf of Crystal Palace Greens