**Crystal Palace National Sports Centre (NSC) - Comments on CSM proposals**

**Introduction**

Over the years, the separate management arrangements of the National Sports Centre (NSC) have resulted in it developing a ‘semi-detached’ relationship with the rest of Crystal Palace Park (‘the Park’).

However, its position and prominence within the Park means that any proposal for its future use and regeneration has direct consequences for the Park.

It is because of this that the Crystal Palace Park Community Stakeholders Group (CSG) wishes to comment on The Mayor of London’s proposals for the development of the NSC and the related public consultation.

**Public consultation**

The CSG welcomes the extension of the public consultation period for the NSC proposals. The original consultation period was unreasonably short and this, along with the decision to limit the groups involved in the pre-consultation period, stands in contrast to community involvement and consultation exercises undertaken for most other recent major plans for the Park. The HLF application involved many groups, the prioritising of GLA funded regeneration projects surveyed hundreds of park users and the Masterplan consultations involved input from many thousands of people over several years. As the current NSC proposals will to a large degree override these previous agreed plans, it is critical that the NSC consultation be as robust, transparent and widely embraced.

The decision to restrict those involved in the pre-consultation was a significant error. Early involvement of local groups, including regular users of the NSC would have avoided many of the mistaken assumptions relating to the patterns of use of NSC facilities that are evident in the current proposals.

**The proposals**

We understand that the GLA appointed project consultants, CSM Limited, were told to ‘think the unthinkable’ when coming forward with options for the future of the NSC.

Far from the ‘blue skies’ thinking we had been led to expect, the four project options strike us as at best pedestrian, offering little more than a managed decline of the NSC and, especially, its associated
athletics facilities. They compare poorly to some of the community-derived proposals that have been suggested over recent months and with the ambition of the Masterplan as set out in the Crystal Palace Park Masterplan Design and Access Statement:

“Crystal Palace Park has a long tradition of hosting a wide variety of sporting activities - including football, cricket, motor racing, swimming and athletics - at a national level.

It is also highly used as a space for a range of recreational physical activity, from families playing ball games to groups of walkers to people training for marathons. The Masterplan builds on this by widening the access to sporting opportunities, increasing the availability of both formal and informal involvement in physical exercise, and integrating the sporting elements with the surrounding parkland. This blending of sport locations and Park aims to encourage more local people to use the sports facilities, and to encourage sports users to make better use of the Park. This also ties in with the number of healthy living initiatives currently undertaken within the Park and the surrounding five boroughs, and will assist groups by providing a safe environment created to suit their needs.”

We also note that CSM said in their press release that the NSC’s future “needs to be linked to the long term Masterplan for the wider Crystal Palace site and take account of the ZhongRong Group’s (ZRG) aspirations to rebuild the original Crystal Palace.” Despite being no nearer to knowing what the ZRG’s ‘aspirations’ are, or whether they are appropriate to one of London’s most iconic public parks, we are concerned that they appear to be exerting an influence over other areas of the Park, not associated with the one they have expressed an interest in developing.

The lack of detail in the CSM proposals makes an assessment of their likely consequences difficult. For instance, there is no information on the commercial or economic case for the proposals, or the effect they might have on future income streams. You will be aware that the CSG is concerned that the economic sustainability of the Park must be given due consideration in any proposal affecting its future.

Nor do the proposals include a cost/benefit analysis aligned to the strategic priorities of the surrounding boroughs. There is also no comparison with the Masterplan proposals which would allow informed consideration of the new components included in the CSM proposals.

The diagrams accompanying the published report also give rise to serious concerns.

The proposed new access roads and paths would create barriers in the parts of the park that are now key for long distance running, cycling and walking. The roads have not been flagged up for consideration in the consultation, despite potentially having a major effect on core park usage. For example, organisers of tri-athletic events have said they will not be able to run events in Crystal Palace if the proposed access road from Crystal Palace Park Road is built.
The Primary School Proposal

The inclusion of a two-form primary school in the proposals appears ill-considered and opportunistic. It fails to take into account the wider consequences for the Park. That it appears in all four proposals is a surprise and has resulted in diagrams appearing to show playing fields encroaching on park land outside the current NSC arena footprint, a further erosion of Metropolitan Open Land (MOL).

The CSG has considerable doubts as to whether the inclusion of any school, particularly a primary school, is appropriate in this park.

A new school building, with vehicle access, parking, security fencing, and child safeguarding measures, would run counter to the goal of aesthetic improvement, improved access, de-cluttering and the removal of obstacles to wider public use of the Park.

In addition, the disposal of MOL for a school is highly controversial and may not necessarily qualify as exceptional circumstances, since it is only available for use by a limited subset of the population.

If another academic establishment, in addition to Capel Manor, was to be considered for the NSC site, it would have been fair and useful to solicit ideas from established schools and colleges in the area, none of whom were aware that this site was being considered for educational use.

As an educational use has been considered for the site, we are surprised that the often discussed idea of a secondary school sports academy (a ‘mini-Loughborough’) has not appeared in the proposals. This at least would have offered opportunities for the retention and possible development of existing sports facilities at the NSC, as well as maintaining the historical sporting legacy of the site.

A number of schools in the area have also expressed concern at the proposal in some of the project options to do away with the athletics track. Many schools in this part of South London do not have playing fields or athletics tracks and easy access to such facilities is often not readily available. The track currently is accessible to any appropriate user. By replacing this with a school, which must by definition exclude outside users, the land use is compromised. We are concerned that insufficient recognition has been given to the importance the NSC athletics track has for local schools.

We recognise that the shortage of school places throughout London is a serious problem and are also aware of the Mayors commitment to release GLA land for the construction of new schools. However, we note comments made by GLA staff during the public consultation event that this commitment has already been met by the release of other GLA land.

Community Wellbeing

We would like to underscore that provision of public green space and accessible shared sports facilities are also critical issues for our area, which is increasingly urbanised. The SE20 area of Penge and Anerley, which borders on the Park, is considered among the most densely populated in South London and “significant areas of Penge and Anerley lack public open space”, according to the Area
Profile of Crystal Palace, Penge and Anerley in Bromley council’s Core Strategy Issues Consultation document. With about two million visitors per year, the Park is heavily used by residents from local areas, as well as by visitors from further away.

The ‘Area Profile’ demography of Crystal Palace, Penge and Anerley also:

“exhibits relatively high levels of multiple deprivation, particularly in respect of health, education, crime and income. In respect of health, life expectancy is lower than the England average. There is a high prevalence of mental illness and the proportion of residents with limiting long term illness than both the Borough and London average. Looking toward future health issues the level of obesity is amongst the highest in the London Borough of Bromley.”

Evidence has shown that all of these problems are ameliorated by access to green space and sports facilities.

Should the ZRG proposal proceed, the Park stands to lose a significant amount of open space. In this circumstance, a new Regional Sports Centre, nestling in an open landscaped environment on the former arena, could compensate for the loss of open land.

**Conclusion**

Crystal Palace is the first example of the ‘sport park’ concept in the UK, and the multi-use nature of the area is still unique in London.

The CSG is aware that NSC stakeholders and user groups will be submitting a detailed response to these proposals - they are much better placed to comment from the perspective of the wider sporting community.

For our part, we would simply observe that there is still a case for a Regional Sports Centre (as envisaged in the original Masterplan) in the Park and that the Olympic facilities in East London are not seen by many athletes from the South of England, as being an accessible alternative.

The CSG’s primary concern is how any proposals for the future of the NSC and the space managed by the GLA impacts upon the rest of Crystal Palace Park.

It is our role to come forward with proposals for an economically and environmentally sustainable future for the Park. We are committed to increasing public access to as much of the Park as we can, to ensuring the role of the community in the Park’s future governance and regeneration and to pushing on with agreed proposals to improve the Park.

On the evidence of the CSM plans before us, it is difficult to see how much of them integrate with already agreed steps to regenerate the Park and they appear to conflict with many of the goals agreed in previous plans.
Crystal Palace Park is not a land bank or a ‘contingency’, offering a quick solution to problems such as parking or a shortage of school places.

Crystal Palace Park is a much loved, historic, Grade II* listed park, designated as Metropolitan Open Land, heavily used for recreation, sport and heritage appreciation; any proposal relating to the Park needs to acknowledge this and build on, rather than decrease, Crystal Palace Park's strengths in these areas.

Martin Tempia
Chair - Crystal Palace Park Community Stakeholder Group
Crystal Palace Park Management Board

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i  CRYSTAL PALACE PARK MASTERPLAN DESIGN AND ACCESS STATEMENT, 3.0
MASTERPLAN PARK-WIDE STRATEGIES, 3.9 ACTIVITIES AND USE, Page 86 - C Sports and physical exercise

ii  MOL = Metropolitan Open Land

The Mayor will and boroughs should maintain the protection of Metropolitan Open Land (MOL) from inappropriate development. Any alterations to the boundary of MOL should be undertaken by boroughs through the DPD process, in consultation with the Mayor and adjoining authorities. Land designated as MOL should satisfy one or more of the following criteria:

- land that contributes to the physical structure of London by being clearly distinguishable from the built-up area
- land that includes open air facilities, especially for leisure, recreation, sport, arts and cultural activities and tourism which serve the whole or significant parts of London
- land that contains features or landscapes of historic, recreational, nature conservation or habitat interest, of value at a metropolitan or national level
- land that forms part of a Green Chain and meets one of the above criteria.

Policies should include a presumption against inappropriate development of MOL and give the same level of protection as the green belt. Essential facilities for appropriate uses will only be acceptable where they do not have an adverse impact on the openness of MOL.

iii  Bromley Council Core Strategy Issues Consultation Document 3.1 Area Profiles, 3.1.10
Crystal Palace Penge and Anerley - http://bromley-consult.objective.co.uk/portal/cs/csissues?pointId=s1302517591926

iv  Bromley Council Core Strategy Issues Consultation Document 3.1 Area Profiles, 3.1.10
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