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**8 April 2009**

Nadia Hussain  
The Planning Inspectorate  
Room 4/04  
Temple Quay House  
2 The Square  
Temple Quay  
Bristol BS1 6PN

Dear Madam,

Site: **Crystal Palace Park, London**  
Your ref: **APP/G5180/V/09/2098454**

Bromley Council Planning Application References:

- **The Master Plan:** 07/03897 - Comprehensive phased scheme for landscaping and improvement of Park....
- **Listing Building Consent:** 07/03907 - Internal and external alterations...[of the National Sports Centre, NSC]
- **Conservation Area Consent:** 07/03906 - Conservation Area Consent: Demolition of walls/fences/gates and various buildings....

**Submission to the Planning Inspectorate by Ray Sacks  
Chair, Crystal Palace Campaign.**

**Introduction**

I am the Chair of the Crystal Palace Campaign (the Campaign) which was formed in 1997 to oppose the building of a large cinema multiplex on the top-site of Crystal Palace Park (the Park). Following the developer's withdrawal of the multiplex scheme, the Campaign set up the dialogue process. This has played a vital role in the development of the Master Plan (the Plan – see Appendix 3; Background) particularly by providing a forum for discussion and communication. For further details on the Campaign – see Appendix 1. Email bulletins to the Campaign's supporters show that the large majority are generally in favour of the Master Plan.

I am a resident of Upper Norwood and have lived here for 26 years – less than 10 minutes walk from the Park. I am a chartered engineer (CEng), Fellow of the Institute of Chemical Engineers (FIChE) and I am also a Member of the Institute of Acoustics (MIOA). My professional background and experience have been very useful in understanding and contributing to the many technical (and other) issues relating to the Master Plan. I have never had any commercial interests in the park either individually or as part of any other group or consortium.

I am writing to support the Outline Planning Application for the implementation of the Master Plan for Crystal Palace Park.

The Campaign, since the beginning of the dialogue process, has supported an approach to the park which is balanced, will not overwhelm the area, will give local people a say in what happens and which will regenerate a much decayed national, Grade II\* listed treasure. After many years of debate, the Master Planners have provided the first comprehensive scheme to regenerate the Park since the original Crystal Palace was built on the site in 1854.

I believe that the plan takes all facets of the Park into account – from wildlife to security, from restoration to DDA compliance, and much else besides. The following submission will put forward views on the items raised in the call-in letter dated 28 January 2009, “about which the Secretary of State particularly wishes to be informed for the purposes of her consideration of the applications.”

### **Sustainable Development (item a)**

The Park in its current state of dilapidation cannot fulfil the tenets of Planning Policy Statement 1 which specifies, amongst other things:

“recognising the needs of everyone” and  
“making suitable land available for development in line with economic, social and environmental objectives to improve people’s quality of life”

This suggests the need for an inclusive approach aimed at supporting the wellbeing of the entire community by carefully balancing differing, sometimes opposing, demands. The Plan meets these requirements by both aiming to improve the current poor state of the Park but also by recognising the practicalities of delivering its vision. Economic sustainability is clearly a key to achieving these goals and the Plan does require some compromise by using a modest amount of space to offset some costs.

The Park at present is physically partitioned and does not operate as a coherent whole, partly because, for example, of the nature of various elements in the park and partly because of safety issues caused by the crumbling historic features and run-down facilities. The Plan will ensure that the Park works as a cohesive and effective whole and is accessible to all visitors. The removal of the steel turnstiles and concrete walkway around the back of Crystal Palace Station shows what can be accomplished to improve access and make the Park more welcoming – although the price tag for even this modest change was about £300,000.

Examples of dysfunction are not hard to find. The Park has very limited toilet facilities (located only at the Penge entrance), rough pathways, steep slopes, concrete walkways accessible only by steep steps and limited play areas for young children. This discourages whole sections of potential Park users – including the very young, people with pushchairs, older people, disabled people and wheelchair users. All these facets are to be greatly improved in the Master Plan scheme.

The Park will attract more visitors to the area, thereby boosting economic activity in local shopping areas. However, this increased economic activity will be proportionate and will not overwhelm the local community as changes wrought by the multiplex would have done. Roads and thoroughways will remain viable even with the slightly increased traffic – improvements in traffic flow already in place

will help ensure this. The key word in all these changes is balance – this the Master Plan has achieved.

The scheme promises social benefit by the inclusiveness of its elements (making the Park attractive and accessible to all) and by a modest increase in economic activity (through some additional jobs, extra visitors and a small influx of new residents). At the same time the Plan makes minimal demands on open space, in fact resulting in a net increase in the amount of available open space.

The consultations suggested that local people generally recognise the balanced approach that the Plan has taken, feel an ownership of the scheme in partnership with the planners and want the work to begin as soon as possible. The DVD included with this note has recorded some of these views.

### **Housing (item b)**

The LDA have stated that the housing proposed will be used only if financing definitely requires it. This is a sensible approach but, in the current economic climate, any contribution to the Plan finances should be welcomed. However, the inclusion of a limited amount of housing should not necessarily be regarded as a negative asset. It does offer positive benefits.

First, these are some facts:

- it is proposed to build the housing on less than 1% of the area of the Park – a modest amount by any standards
- the proposed sites are along the periphery of the Park (north-eastern corner and boundary) and therefore will have minimal impact on the general body of the Park.
- none of these areas are currently accessible to Park users
- the Rockhills area (northern corner, about 6 acres) has *never* been open to the public
- the net effect of the Master Plan scheme in this area of the Park will be to free an extra 4 acres for Park users to enjoy.

The housing proposed in the Plan would make a modest but welcome contribution to meeting London's housing needs and it would fund about a quarter of the basic category of improvements for the Park costing about £41.8 million. The Master Plan, Planning Policy Context, item 5.63, states that: "In seeking developer contributions, the presumption is that affordable housing will be provided on the application site so that it contributes towards creating a mix of housing." This would be the most desirable outcome although provision is made for a "contribution in lieu of on-site provision" for "the creation of mixed communities in the local authority area." Either of these routes would provide the affordable housing desirable in this development.

With regard to the fabric of the building, once again it should be noted that this is an application for Outline Planning Permission and the details of the design are yet to be decided. I believe that the Master Planners, from what they have shown during the consultation, will produce high quality, energy efficient designs which will be in keeping with the nature of a Grade II\* listed Park.

Housing in the Rockhills area plays an important role in the creation of the new entrance to the Park. There is no formal entrance there and currently access is via a road with no pavements, then through a break in the fencing. The new entrance required by the housing will for the first time provide a welcoming link

to the Park – and added security - for people already living on that currently isolated side of Crystal Palace.

### **Biodiversity and Geological Conservation (item c)**

The extent of the Master Plan's impact on the ecology of the Park was outlined in the Environmental Impact Assessment statement summary, section 15. Natural habitats have been surveyed including fauna and flora surveys and an arboricultural survey (trees). The work on trees is summarized in the Master Plan, "Parameter Plan 4". In fact, the planning of the role of trees in the Park ensures that there will be a net increase over the years – up to the point where a suitable balance is achieved between replacement (new plantings) and the removal of dying or dangerous trees. This is sufficient to demonstrate that all aspects of these issues accord well with the spirit of what is meant by PPS 9. Further, the gradual falling into disrepair of the Park needs to be avoided to maintain this biodiversity.

### **Planning and the Historic Environment (item d)**

A significant feature of the Park is the historic legacy of Joseph Paxton's design for the Sydenham Crystal Palace. This was not simply a removal of the Great Exhibition building from Hyde Park to Sydenham Hill, but included an increase in size and scope, all of which had an immense influence on contemporary and subsequent architecture.

It is impractical in terms of cost – and arguably undesirable in terms of architectural innovation - to consider any kind of re-construction of the original buildings. However the limited amounts that remain could and should be preserved. Currently large sections of the Italian terraces are fenced off because they are unsafe, and there are cracks in the supporting structure and sections of balustrade completely missing. Plinths stand, as in a ghost town, mostly without their original statues (a few of which have been preserved by the rangers). The sphinxes, adorning the stairways that once led into the Crystal Palace, are cracked and the castings are full of holes – ideal places to put rubbish! These will all be repaired and the stairways re-opened.

Careful surveys done by the Master Planners of the historic record clearly show the extent to which the heritage of the Park has been considered. As well as removing fences, rendering those areas safe, the Plan will provide a better context in which this unique heritage is to be experienced.

Limited archaeological investigations suggest that not much of value is hidden beneath the Second World War rubble dumped from London's bombed out areas. Nevertheless, there is provision for care in the proposed works - for example, money has been set aside for unexploded ordnance indicated from the study work done.

### **Planning for Open Space – Sport and Recreation (item e)**

The advent of the Olympic Games has given an impetus to the need for repairing the run-down sports facilities in the Park and yet at the same time, has delayed the introduction of completely new facilities to cater for the whole community. The Plan does not include the proposed new sports centre as an explicit design element; nevertheless it makes provision for its incorporation in the future when

detailed design and costing will be necessary. The sporting community has already contributed its views as part of the dialogue process (the Sports Working Group) and continues to do so.

The facilities at Crystal Palace Park are the only comprehensive sports training facilities in London. The Park houses the only 10m diving board and the only Olympic standard pool in London. The old facilities of the NSC are currently undergoing extensive refurbishment but they will probably only be in service until the new facilities are built after the Olympics. The Plan has proposed an elegant solution for the retention of the NSC, a Grade II\* listed building. Thus it has protected existing facilities for the whole community and made provision for a future new sports centre in a more appropriate location – nearer Crystal Palace Station and not taking up large areas of central parkland.

Part of the historic sports provision in the Park has been for the FA cup, motor racing and cycling. Only the last of these is to be resurrected in the form of a cycle track. But a good, distance-marked jogging track will also be provided under the Plan.

### **Permission Subject to Conditions (item h)**

Outline Planning Permission was submitted by the LDA, allowing ample opportunity to discuss design details as they come up for full planning approval. Indeed some of the proposed elements, which are part of the enhanced plans, will obviously depend on funding and may not get built. This would be regrettable but will depend on conditions at the time; Park regeneration works may of course be spread over a relatively long period. I cannot see, therefore, that there is any item that requires special conditions to be set.

### **Other Planning Items (item i)**

An important part of the design, development and planning process has been consultation with the public - one of the most extensive processes of its kind, extending over many years. A plan of this size and scale simply cannot please everyone without rendering the proposals too bland and determined by the "lowest common denominator". I believe it is necessary to take into account the views of the majority of people, particularly with reference to the housing: i.e. most respondents to the consultation did not regard the inclusion of housing as a significant problem. Most people who attended the final exhibition, just before the Master Plan was submitted to Bromley Council, thought that the Plan was really a significant step forward. I, therefore, add to my comments a short film ("vox pops", see notes in Appendix 4) which presents those views recorded on the day of the Master Plan Final Exhibition, and subsequently shown on a Crystal Palace Park Blog.

Full reference link: **FILM LINK:** <http://video.google.co.uk/videoplay?docid=-7131022084040514230&hl=en-GB>

**Final Note**

If required, I am prepared to appear at the enquiry.

I would like a copy of the decision letter as soon as it is published.

Yours faithfully,

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## **APPENDIX 1: Crystal Palace Campaign**

The Campaign was formed in 1997 when it became known that a large cinema multiplex complex had submitted an application for planning permission which would cover the top site of the park with a large commercial enterprise – 20 cinemas, amongst other things.

The Campaign presented a large anti-multiplex petition to Downing Street, fought the application by judicial review and other legal routes and held many public meetings, the largest series of which commanded attendances of about 1000 people. Marches and parades often had a turn-out of several hundred supporters.

After a long campaign, the developers withdrew in May 2001.

The Campaign decided not simply to pack up and go away since that could leave the field open for another, similar developer and the prospect of another long campaign. We decided to do two things: (i) promote a dialogue between all the stakeholders with an interest in the Park and (ii) conduct a formal survey in order to quantify the views of local people.

The first meeting of the dialogue process was held in June 2002; it took a long, hard effort to get the main protagonists to sit around the same table and it was an especially difficult period since Bromley Council showed every sign of looking for a new developer (see Appendix 2) to take over the (still valid) planning application.

An independent facilitator was used, Nigel Westaway and Associates, to run the meetings, with finance provided by various authorities. This Stakeholders' or Dialogue Process continued until the submission of the Master Plan. The Park Working Group still meets regularly, appoints its own chair on a meeting-by-meeting basis and keeps abreast of ongoing park affairs.

The survey, entitled "Consultation Starts Here" was published in March 2002. The questionnaire was developed in conjunction with a number of experts in landscaping, architecture and design. Samples of the questions were tested on a number of randomly selected people. The overall analysis of responses was based on three main sources: door-to-door delivery of about 40,000 questionnaires, a sample of about 250 people using the park on a particular weekend and many school visits. Experts in statistical analysis were used to analyse the responses (about 2300 returned questionnaires) and produced the basic results tables.

The detailed, full analysis in the report is not discussed here, other than to point out that: (i) large commercial development on the top-site was strongly opposed but that some development was regarded as acceptable, provided that the community had a say in its form and (ii) an analysis of the statistics showed that relatively small samples (about 200) can represent the whole sample very well – park visitor results being similar to the general responses.

The Campaign has participated all along in the dialogue process and represents the remains of the original Campaign supporters. We have a mailing list of about 500 with whom we communicate mainly via emails. We seek to represent them, and other supporters we meet from time to time, in the dialogue process. We concentrate on the issues defined in our Core Principles. But for further information on the Campaign see the website with related news:

<http://www.crystalpalacecampaign.org/>.

We plan to remain as a group until the Core Principles have been satisfied – the remaining item being the involvement of the community in the governance of the park.

## **APPENDIX 2: Threat Still Looms Over the Park**

*Article published in The Post, 16 January 2002 by Helen Parrott*

The unpopular prospect of another developer building a massive leisure development on historic parkland has reared its head again.

Bromley Council leader Michael Tickner has not ruled out the possibility that Crystal Palace Park top site could still be developed - just six months after controversial plans to build a cineplex were sensationally scrapped.

Residents claimed victory hoping that after five years of legal wrangles, court cases, European intervention and even eco-warriors, who took to the trees in protest, the council would now abort its development plans.

But undeterred Cllr Tickner said Bromley was still inviting bids from any business interested in developing the land.

He said: "It remains our intention to develop the site which is now derelict.

"The site does have planning permission for a development. If a proposal comes forward we would want to consult with the local community on that, whether it be a multiplex or hotel or sports and leisure centre, a retail outlet or restaurants.

"But it will ultimately depend on someone who can afford to develop it."

Cllr Tickner was responding to campaigners who have sent him an open letter this week demanding a say in the future of [the] much-loved park.

The Crystal Palace Campaign (CPC) wants the Bromley boss to work alongside residents to restore the land to its former glory and have called for "partnership and dialogue."

## **APPENDIX 3: Background to the Master Plan**

After at least five years of debate, consultation, planning and design, the Master Plan for the comprehensive regeneration of Crystal Palace Park was submitted in November 2007 by the Master Planners (Latz and Partner of Munich) to Bromley Council – the planning authority for the area.

A panel consisting mainly of the LDA and their delegated associates (including English Heritage) chose the Master Planners. The panel also included two members of the community (one being myself) chosen from the dialogue process "Park Working Group".

At least 33 consultants at one time or another worked on the development and realisation of plans for regeneration of the Park including consultants on: unexploded ordinance, quantity surveyors for costing, lighting, heritage, arboriculture, landscape architecture, interpretation strategy, environmental impact assessment, socio-economic benefit and many others.



Bromley Council took just over a year to bring the matter formally to their Planning Committee for a decision. The Outline Planning Application, after a substantial debate including submissions from the public, was duly passed at the meeting on 9 December 2008.

This document sets out arguments to support the LDA Master Plan particularly relevant to the matters raised in the call-in letter dated 28 January 2009 from the Planning Inspectorate – signed by Pamela Roberts, East London Plans & Casework Team, Planning and Housing Division.

#### **APPENDIX 4: Notes on Crystal Palace Park Exhibition Film**

- The film was made in 2007, during the final Plan Exhibition, by my son Jacob Sacks-Jones, then aged 12.
- The work was entirely his own, including the filming, the script, the editing and the choice of sound.
- I arranged the interviews with Roger Frith and John Greatrex, but otherwise took no further part.
- The people from the exhibition were chosen at random.
- They were asked the single open question - "What did you think of the plans?" This was the only coaching done by me i.e. to help get a form of words that were simple and not leading.
- The attached DVD is a slightly shortened version of the original - some references to English rugby were removed. A link to the complete film is given in the text above.