

NOGOE

No to Greenwich Olympic Equestrian Events

Greenwich Park, Application Nos 09/2598 and 09/2599

ANNEX A

to letter dated 27th January 2010

ARCHAEOLOGY

GREENWICH PARK

ARCHAEOLOGY

Greenwich Park is one of the most important heritage sites in the world lying within the *Maritime Greenwich World Heritage Site* “which is now ranked among the most famous and prestigious sites in the world”. (The Maritime Greenwich WHS Management Plan)

It contains 2 archaeological sites which are *Scheduled Ancient Monuments*, is listed on the *Register of Parks and Gardens of Special Historic Interest at Grade 1* and falls within the *Greenwich Conservation Area*.

In archaeological terms it could hardly be of more national or international importance.

We suggest that in the light of what follows, far from winning international renown for Greenwich, a decision to allow the Equestrian Olympics to take place in Greenwich Park would subject Britain to worldwide criticism for allowing one of its most prestigious heritage sites to be invaded and damaged by sporting events. That UNESCO was already concerned about Britain’s poor reputation for looking after its World Heritage Sites was reported in the Guardian 8 Sept 2008.

One of the country’s leading historians, Dr David Starkey has said “To host the Equestrian Events at a UNESCO World Heritage site is a monstrous proposal. The route of the cross-country event will cause unnecessary damage to one of the UK’s most important cultural and historical sites.” It is for this reason that Dr Starkey became one of the NOGOE patrons.

It is understood that the decision to use the Park was a “back of an envelope” affair taken hastily at the time of the Olympic bid and was made without knowledge of its outstanding archaeological importance. The decision should not have been made on that basis since it committed LOCOG to the use of Greenwich Park for the Equestrian Olympics in advance of receiving Environmental Assessments.

Had the bid company commissioned such assessments before the decision to use the Park was taken they would have realised how unsuitable a venue it is on archaeological grounds alone. It would have seen that with 79 known sites and the judgment of the Royal Commission on Historic Monuments (RCHM) that

“the potential for further accidental discovery of buried features is high and ground disturbance in any form at any time may bring further evidence to light” (RCHM 1994, its emphasis)

there would be inevitable damage to the archaeology.

RCHM's prediction has already been fulfilled in a recent discovery not mentioned in LOCOG's reports. It is described below and illustrates that the risks involved in mounting a major event in an archaeologically sensitive venue such as that represented by Greenwich Park are extremely high.

These risks throw serious doubt on LOCOG's ability to return the Park in the condition in which it took it over as they have guaranteed to do.

The role of English Heritage

LOCOG has often said that English Heritage would not let it do anything to damage the heritage value of Greenwich Park. In fact English Heritage has no jurisdiction over the archaeology of Greenwich Park and was not, as far as we know, given the opportunity to say in advance of the bid whether it considered the Park suitable for Olympic events. The role of English Heritage appears to have been confined to making recommendations on minimising possible damage. To this end we believe that it has put in tireless effort but that it has been forced into a position of negotiating compromises not totally in the best interests of the Park's heritage. As an example of these we would cite the dangerous brinkmanship that LOCOG is proposing to play with the more ancient sites, particularly the Roman and Saxon. We give more detail on this below.

The Environmental Assessment

Given the difficulties they face in trying to protect the Park's archaeology it is not surprising that the Environmental Assessment LOCOG has commissioned is less than clear on the issues at stake.

The archaeological information contained in the Environmental Statement is so widely dispersed and difficult to access that if the Planning Board is to reach an informed decision it is imperative that they receive further clarification on the relevant issues before considering this matter.

For the sake of brevity we have confined ourselves to four of the most important for detailed discussion.

- A.** The proposed treatment of the **Roman remains**.
- B.** The proposed treatment of the **Saxon remains**.
- C.** The ways in which it is proposed to handle **new archaeological material** which has either already appeared or might appear.
- D.** The extent and complexity of the **mitigating measures** that are being proposed

A. The Roman remains

The Romano-Celtic temple site in the Park has the highest possible archaeological status internationally, being one of the most outstanding monuments in a World Heritage Site and nationally, being a Scheduled Ancient Monument.

It consists of a complex of buildings, ditches and metalled surfaces thought to represent the remains of a Romano-Celtic temple and its associated buildings. It enjoyed a high status in the Roman era and appears to have been in use for almost the entire period of Roman occupation of this country. There is little to see on the ground yet the site has high archaeological potential.

This site became a **Scheduled Ancient Monument** the day after the Planning Application was submitted. We suggest that the fact of its scheduling is pertinent to this application and should be made known to the Planning Board.

We note that an application to the Secretary of State is required for any works affecting a Scheduled Ancient Monument or its setting and question whether this application has been made.

We are concerned to note that the ES fails to clarify that this site consists of a complex of buildings. The description of AF2 in Appendix 9A, p68 reads: "three floor surfaces and remnants of ragstone walling. Finds included over 350 roman coins, fragments of a statue and inscribed tablets. Later excavations determined two phases of building, gullies and possible outbuildings. Probably a Romano-Celtic temple"

This description does not make clear that there are the remains of further buildings on the far side of the path from the temple mound, nor that the 300 or so coins from the 1902 excavation were found spread over an acre of ground. It thus minimises the known and likely extent of remains on this prestigious site.

We would also point out that this description of the temple site neglects to mention how close some remains are to the surface. That the footings of a Roman wall lie just a few centimetres under the surface was shown by excavation in 1999, Trench 3/6 (Becky Wallower has written a full account of the investigation in *London Archaeologist* 2002:

http://ads.ahds.ac.uk/catalogue/adldata/arch-457-1/dissemination/pdf/vol10/vol10_02/10_02_046_054.pdf and

http://ads.ahds.ac.uk/catalogue/adldata/arch-457-1/dissemination/pdf/vol10/vol10_03/10_03_076_082.pdf) and must point to the probability that artefacts as yet undiscovered lie at an equally shallow depth. This likelihood is underlined by the fact that 300 coins picked up over an acre of ground in 1902 (Webster 1902, 71) must have lain close to the surface.

We are concerned about the inadequacy of the description given because it appears in ES's baseline assessment and therefore forms the basis upon which the risks of accidental archaeological discoveries at this site and proposed mitigating measures are founded. It suggests that such risks and mitigating measures might also have been minimised.

This impression is confirmed when the proposed route of the cross country event is superimposed on a plan of this site. The map at the end of this statement is reproduced from the ES Fig 9A.3I with the proposed route of the cross country event and the boundary of the Scheduled Monument added by hand. It demonstrates that LOCOG proposes to run the cross country course across the temple site and the small valley to the north of it

We are deeply concerned about this, especially in view of LOCOG's proposal to strip topsoil from the proposed course. The mitigating measures proposed appear to include a protective membrane and covering of some imported material such as sand but it is not made clear where the top soil stripping would end and the membrane begin. It looks, in fact, as though the temple site will be deliberately made a particular feature of the course since a triple jump, a spectator stand and a camera position are very close by. It seems inevitable that Roman remains will be unearthed and lost here.

The temple mound was once in all probability much larger than it is now and has collapsed over time spreading many of its contents into this valley. Since this valley has never been excavated the chances of Roman material being buried there must be ranked as high.

We therefore object to the proposal to run the cross country course through this Scheduled Ancient Monument and its adjoining valley.

Other signs of Roman occupation have been discovered in the Park. Those to the north are shown on the ES Fig 9A.3H. Finds spread throughout the Park include a Roman coffin, a flagon, 2 bowls found in different places and many coins, some from the preceding Iron Age. Not all of these are noted in the ES. They suggest that there is a high probability of further remains being discovered almost anywhere in the Park.

The map shows in blue two groupings of trenches dug at various dates. They are taken from the ES Appendix 9A fig 3I. Those around the site labelled "Romano-Celtic temple complex" date from 1977/8 and 1999 and all revealed items of archaeological interest.

Those labelled "1906 Roman site" are less well recorded. We suggest however that the fragments of evidence which are available point clearly to a Roman or earlier presence in this area when taken together. The ES Appendix 9A 4.4.4 draws on some of these when it admits

"Another Roman "site", an earthwork (AF 38) appears to be close to the excavations of 1906 (X3). Over 300 coins found at the site (X15) in 1902 were from "over an acre" of ground (Webster 1902, 71) and its proximity to the 1906 site (X3) may suggest a wider area of Roman activity within the Park."

Furthermore, “the line of Watling Street from London to Dover is thought to have run westwards south of the Park but there seems to have been a branch running diagonally across the Park to the Roman temple and possibly continuing beyond, passing out near the north-west corner. If this was the case, it may be pertinent to remember the Roman custom of locating burials along major routes outside the settlements.” (ES Appendix 9A Para:5.2.3)

We maintain therefore that the proximity of these two groupings of Roman remains, together with the likely presence of a Roman road, indicates a high probability of further Roman material existing under the ground between them, perhaps very close to the surface.

It is therefore with the greatest concern that we view LOCOG’s proposal to remove the topsoil from all or part of those sections of the proposed cross country route identified on the map. The purpose of this is evidently to try and preserve the Dry Acid Grassland which has protected status but it in doing so it puts the archaeology at risk.

The map makes clear the archaeological brinkmanship such stripping would involve. The proposed course passes over the Romano-Celtic temple mound; it crosses and recrosses between this mound and the 1906 site further south and runs close alongside both sites.

In addition to the removal of topsoil, preparations for the cross country event are expected to involve decompaction using spikes between 70mm and 120mm in length. There is a possibility that such decompaction would disturb the remains of Roman occupation since it is known from the excavations of 1999 (trench 3/6) that some remains lie within 70mm of the surface (*Wallower op cit*).

On this basis we object to the cross country course passing between these two Roman sites as is proposed in this application.

B. The Saxon Remains

We note that although it is proposed to place a Spectator Exclusion Zone round the Saxon barrows on the western side of the Park the route of the cross country event passes through this, running right over of one of the smaller barrows.

We assume that the measures necessary for the preparation of this part of the course are the same as that described above under the Roman heading since it is also Dry Acid Grassland.

The ES describes the Saxon remains at AF2 as a “Saxon Barrow Cemetery. A cemetery of at least 31 barrows, which antiquarian excavations suggest are c 7th century pagan Anglo-Saxon grave mounds.”

In view of the implication contained in this description that there could be more than 31 barrows and the fact that preparation of the course will involve

stripping the topsoil **we object to the course passing as close to the Saxon barrows as is proposed.**

- C. **New archaeological material** (which has either already appeared or is uncovered in the course of preparation for the cross country or during the event itself)

Although the archaeology of Greenwich Park is extensive, 79 sites of interest being listed in the ES, very little has been excavated. There has never been much pressure to direct scarce resources in this direction because it was felt to be safe from any threat of development. The Park is therefore richer in archaeological potential than in known facts and this is part of its charm.

This makes it especially dangerous for an event such as the Olympic cross country to be mounted here. Somewhere like Abbey Wood where the remains are already exposed would be safer than Greenwich Park. It is tempting to believe that Greenwich is of minimal archaeological interest because little is apparent to a casual observer on the surface but in fact its interest is considerable.

The chance of new material coming to light is recognised by the ES as “high” for every historical period except the Roman and we have given reasons above for maintaining that this should also be assessed as “high”. (Appendix 9A Para: 5.1.6 and 7.1.2)

The documentation supporting this application puts forward the proposition that recording any new site that might appear would be an acceptable trade-off for the risk of damage to or potential destruction of such a site. (ES para: 9.7.6 and 9.7.7) It is unclear if there is any contingency funding provision for what is likely to be the considerable cost of doing this.

Given the exceptionally high archaeological status of Greenwich Park we find it extraordinary that this proposal is made without benefit of wider debate among the archaeological community. **We suggest that it is unacceptable for such a principle to be arrived at solely by a would-be developer, however much consultation has taken place with their advisors.**

Such debate would take into consideration the risk of new sites going unrecognised and unrecorded given that the time constraints under which the Olympic preparations would be happening would necessitate such preparations being given priority over archaeological possibilities.

There is also the fact that the position of new sites is unknown by definition and they cannot therefore be protected from either the foot traffic of the 50,000 – 75,000 spectators who are expected to attend or from the vehicular traffic and numbers of personnel of all kinds that will be involved in preparations for the cross country.

Much of the Park’s history is contained in its topographical variations which are endangered by any earth moving activity. By the happy accident of the Park’s

Royal patronage ground levels have remained largely undisturbed and as a result the Park is rich in remains of medieval ridge and furrow cultivation, remnants of ancient trackways, valleys carved out by stratum spring water and many other such items, extremely rare in an urban environment. Not all of these are known or properly recorded and the large scale earth movements proposed by LOCOG must threaten those which are as yet unknown. The slighter the inclines or declivities, the more prone they are to being unwittingly obliterated.

That our concerns about as yet unknown sites are well-founded is demonstrated by the fact that **a new site of potentially high archaeological interest** has appeared in the Park in the last few months. In a place not previously thought to be of any archaeological concern, bricks and tiles of unknown provenance have begun to appear through the soil where the grass has worn away, extending to approx 15 metres square.

The Sayers map of 1840, in common with every other relevant map of the Park, makes it clear that these remains do not relate to the Old Keeper's Cottage, or the small conduit head that used to be in the vicinity.

Examination of all known maps of the Park reveals nothing in this position and the possibility of it being a Tudor building has to be considered. Some slight evidence for this is contained in a Deed of Gift dated 1614 by which James 1 gave the Park to his wife, Anne of Denmark. This mentions "houses and lodges" in the Park and cannot refer to the Queen's House (not begun until 1616) nor any buildings to the north of it which would have been outside the Park boundary.

This potentially important site does not appear anywhere in the documentation supporting the Planning application, possibly due to its recent discovery, but its omission underlines the dangers of granting permission for a major sporting event in a Park so unpredictable in archaeological terms.

The extent of this new site is unknown and its condition very fragile. **Its sudden appearance underlines the case against putting the archaeology of the Park at risk by allowing the Olympic events to take place there.**

In the event that they are allowed however we would argue vigorously that the vicinity should at least be protected by an exclusion zone.

D. Mitigating Measures

There is no indication in the ES of how all the mitigating measures are to be co-ordinated, whether it is even possible to implement all of them or how effective they are likely to be.

Table 7 in ES Appendix 9G lists 68 archaeological sites on which there will be potential impacts from the LOCOG proposals. The number of potential impacts on each Archaeological site varies in number generally from 4 to 5 to

the mid 20's. This is a clear acknowledgment by LOCOG that the adverse impact on the archaeology will be potentially very great.

In Table 8 LOCOG lists the mitigation measures which they propose for each archaeological site and for each impact on that site. Almost all the mitigation measures are extremely vague such as "Monitoring of spectators" and "No heavy site traffic in poor weather". The Appendix states that mitigation of identified impacts will be the subject of a detailed Mitigation Management Plan. This is a critical document and is not yet available.

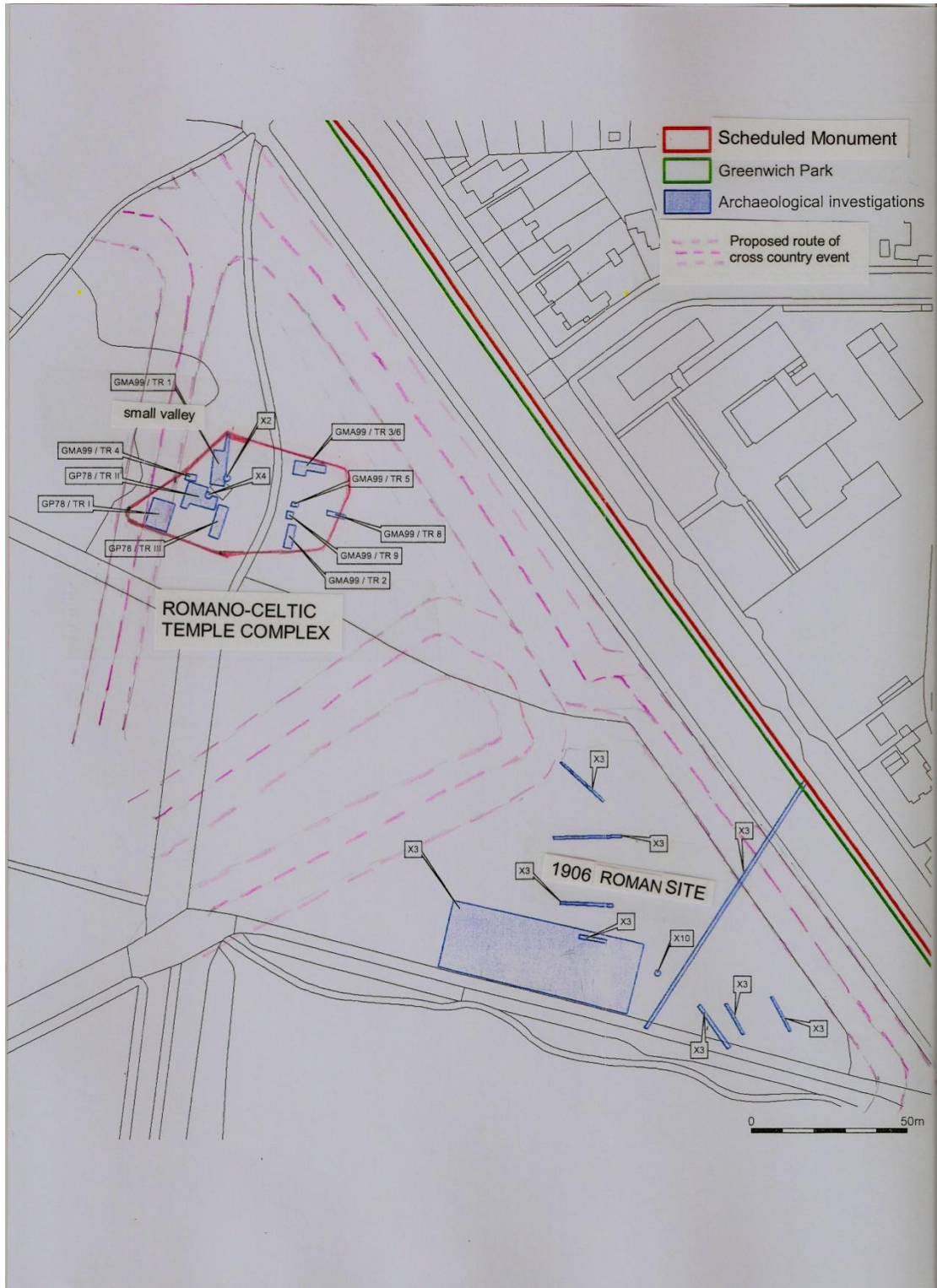
From the number of mitigation measures which are proposed for archaeological features alone, particularly when added to those measures proposed to protect trees and ecology, it is clear that it will be impossible to monitor all these in an effective manner. It underlines the fact that the Park is unsuitable as a site for the Equestrian Olympics.

Conclusion

It cannot be right that our cultural heritage should be put at risk in order to accommodate a temporary venue for a sporting event, however prestigious the event may be.

Inclusion of a site in a World Heritage List highlights the outstanding international importance of that site as a key material consideration to be taken into account by local planning authorities. **World Heritage Sites have been designated for their outstanding universal value and local authorities should place great weight on the need to protect them for the benefit of future generations as well as our own.** (PPG 15)

We submit that this Planning Application should be refused.



Greenwich Council
Planning Department
5th Floor
Crown Building
48 Woolwich New Road
SE18 6HQ

January 25th 2010

Dear Sirs,

I am writing to you concerning the Planning applications submitted by LOCOG in December last year, to use Greenwich Park for the 2012 Equestrian Olympics.

I wish to support the opposition by NOGOE to the archaeological aspects of the Planning applications and I am entirely happy for NOGOE to use this letter as part of their opposition.

More information relating to LOCOG's archaeological proposals need to be provided before they can be regarded as complete and accurate enough to be assessed satisfactorily. NOGOE wrote on the 13th January asking for a site meeting to discuss these issues with the applicants. I understand that, as yet, no reply has been received.

Though information and clarification is being sought by NOGOE, it is clear to me that what is being proposed may well do severe damage. The Royal Park contains Scheduled Ancient Monuments and is an archaeological landscape of great importance, as well as being a World Heritage Site. Much of it has yet to be explored archaeologically. It seems to me unthinkable that the Park should be chosen as the venue for a temporary sporting event, particularly bearing in mind the scale and duration of the construction and other activities proposed in the Park, until measures to secure the survival of the fragile historic landscape, both visible on the ground surface and buried below, have been agreed as satisfactory.

I undertook the 1978 archaeological investigation of the Roman remains in the Park for the DOE and advised the Time Team during their excavation in 1999, so am reasonably familiar with the archaeological features of this period, both visible and buried just beneath the surface of the Park. In my opinion the Time Team excavation particularly demonstrated that there are likely to be Roman buildings, still to be discovered just below the turf, over a wider area of the Park than LOCOG and its advisers appear to envisage.

Yours faithfully

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09/2598/F (Greenwich Park)
09/2599/L (Greenwich Park)

Dear Sirs,

I am writing to comment on the Planning applications which were submitted by LOCOG in December last year to use Greenwich Park for the 2012 Equestrian Olympics.

I am familiar with those parts of LOCOG's proposals which will have an impact on the archaeology of the Park and am very concerned that these consequences are not clearly and fully highlighted in LOCOG's application documents.

I have read and support the detailed archaeological statement made by NOGOE to the Planning applications, and I am entirely happy for NOGOE to use this letter as part of their opposition.

I am extremely concerned that the fragile but highly significant archaeology of Greenwich Park – a Royal Park and part of the World Heritage Site will be damaged irreparably by the equestrian events. This would be a tragic loss as the sites are extremely important not only locally but also in the context of the early history of London. Indeed, one of the 1999 finds could imply that Greenwich may have been an important part of the administrative hinterland of Roman London.

The Anglo-Saxon Cemetery and the Roman site are unique in Inner London particularly as the landscape around them has been preserved.

The archaeology of the park has been inadequately investigated because of the protection offered by its royal status.

As Local History Librarian for the Borough of Greenwich from 1969 to 2003 I was closely involved with the 1978 excavation of the Roman site carried out by Harvey Sheldon and Brian Yule and also the 'Time Team' dig in 1999. I have researched the history and archaeology of the park extensively and have maintained a great interest in and enthusiasm for it.

I have a particular concern for the area which extends from the site of Herbert Jones' 1902 excavation on the Temple mound and the 1999 Time Team dig to Jones' large but less well known 1906 excavation adjacent to the Flower gardens. Much of this area has never been excavated so could still yield very significant information.

Yours sincerely,

(sgnd) Julian Watson DMS MCLIP