

## APPENDIX A

Date: Mon, 14 Dec 2009 14:40:14 +0000

To: [enquiries@ecologyconsultancy.co.uk](mailto:enquiries@ecologyconsultancy.co.uk)

Subject: FAO John Newton: Bat survey undertaken for LOCOG in Greenwich Park, 2009

Ecology Consultancy  
Bon Marche Centre  
241-251 Ferndale Road  
London SW9 8BJ

Dear John Newton

### BAT SURVEY CONDUCTED FOR LOCOG, 2009

LOCOG has now submitted its planning application to Greenwich Council (for permission to use Greenwich Park as the venue for the 2012 Olympics equestrian events), and I have been looking at the documents in the Environmental Statement that have to do with the bat survey. I should be grateful if you could respond to the following questions:

#### 1 Licensed bat worker

I note that the people from your consultancy who conducted the surveys were: Sasha Dodsworth, Toni Harrington, Laura Murray, Caroline Nash, John Newton, and Huma Pearce. Huma Pearce was also the named bat worker licensed by Natural England. Please tell me why you did not engage an independent licensed bat worker, instead of using one of your own staff (who joined your consultancy in April 2007). I promise you that this proposal by LOCOG to use Greenwich Park for the Olympic 2012 equestrian events is so controversial, and there has been so much bad faith shown by LOCOG, that it would have been only prudent to engage someone who was self-evidently independent of your organisation, rather than a member of your own staff.

#### 2 Limitations of your survey

I note paragraph 3.1.6 of the Appendix 11D says, "surveys were not undertaken during August 2009 because of health and safety concerns. Data on bat activity within the Park during this month is therefore absent." However, the BCT Survey Guidelines state (page 42) that "August is an especially good month to observe maternity roost re-entry, as young flyers can be inexperienced and are often highly visible when returning to the roost". Please could you let me know why exactly you did not make a special effort to survey during August, given that that is an especially good month to observe the latest generation of bats.

Paragraph 3.1.7 of Appendix 11D says, "Access to the northernmost part of the application site, which includes the Queen's House, the Old Royal Naval College and the National Maritime Museum, was not possible during the surveys. Bat activity within this part of the project site was therefore not included within the assessment." You may be unaware that the "northernmost part of the application site"

is where LOCOG proposes to erect the 23,000-seat stadium (an enormous structure which would dwarf the Queen's House). I don't think that it is acceptable to omit bat surveys from this part of the Park. Please tell me why you did not include this part of the project site.

Later in this Appendix (eg paragraphs 5.1.3 and 5.1.4 and 5.1.7), you recommended further surveys during 2010, including of the northernmost part of the site. As this would very likely happen only after planning permission had been granted - if it had been granted - and preparation work already started on the Park, no one living here would be at all optimistic that anything that those additional surveys found would halt the Olympics juggernaut. Also, now that we know (from the planning documents) the volume of lorry/construction traffic and disruption, I think I can say with confidence that by the time you undertook your additional surveys in 2010 there would be no bats left in the Park. Which would be just what LOCOG wanted.

#### 3 Bat transect survey results

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Why are these your survey results not set out in the way recommended by the BCT Survey Guidelines? Why is the information about the observation station numbers omitted altogether?

4 Sunset/sunrise and survey start times Appendix 11D states (3.1.2) "dusk surveys commenced at least 15 minutes before sunset and lasted for at least 1.5 hours after sunset". However, on

28 May 2009, sunset was at 21:03 but your surveyor(s) started at 20:53.

18 June 2009, sunset was at 21:21 but your surveyor(s) started at 21:10.

22 June 2009, sunset was at 21:03 [sic] but your surveyor(s) started at 20:50.

29 September 2009, sunset was at 18:44 but your surveyor(s) started at 18:35.

None of those surveys were started "at least 15 minutes before" sunset. And it is impossible that the sunset on 22 June (the day after the summer solstice) was at the same time as sunset on 28 May. Furthermore, the BCT Survey Guidelines, section 4.6.4 say that "In the evening, surveyors should search for bats from 30 minutes before sunset".

On 23 July (your only dawn survey), sunrise was at 05:11 but your surveyor(s) started at 03:21.

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## APPENDIX B

# NOGOE

## No to Greenwich Olympic Equestrian Events

17 City Business Centre, Lower Road, London SE16 2XB

[www.nogoe2012.com](http://www.nogoe2012.com)

Robert Creber Esq  
Venues Project Manager  
LOCOG  
One Churchill Place  
Canary Wharf  
London E14 5LN

13th January 2010

Dear Mr Creber,

We are concerned that for a variety of reasons the Environmental Statement which accompanies your application for planning permission for the Equestrian Olympics to be held in Greenwich Park does scant justice to the importance of the Park's archaeology.

Given that the Park carries the highest possible heritage status at national and international level, we would ask for an early opportunity to meet with representatives from LOCOG and your experts on site in the Park in order to bring our particular concerns to attention.

We would suggest in particular that the presence of English Heritage would be helpful and for our part we would like to bring Harvey Sheldon, Senior Lecturer in Archaeology at Birkbeck College, University of London. He is the noted specialist in Roman archaeology who excavated the Roman site in the Park in 1978 and acted as advisor to the Time Team in 1999. Also Julian Watson, former Borough Archivist who has pursued a lifetime study of the history of Greenwich Park and is the locally acknowledged expert on this subject.

Fred Brown, the case officer for this application to Greenwich Council has agreed to attend as an observer.

Among the main reasons for our concern are;

1. A new archaeological site of potential importance has recently begun to emerge spontaneously north of Queen Elizabeth's Oak. Its origins are so far unknown but it appears likely to have been a Tudor dwelling of considerable proportions. It is clearly not the Old Keepers Cottage that it was first thought to be. This is nowhere mentioned in your Environmental Statement yet clearly requires discussion before permission for the Cross Country Event is considered.

2. The extent of a Roman presence in the Park is not dealt with accurately or effectively in your reports which leads us to fear that it will not be accorded the respect or the protection it deserves. We regret to say that, as we instance below, we found the information in Section 9 of the ES and Appendices difficult (and at times impossible) to follow. Before we meet, therefore, and in the hope that it might assist, we would very much appreciate it if you would follow the suggestion made by English Heritage, in its letter dated 5th October 2009 to LOCOG that it should publish the detailed nature of the archaeological and historic research that it

commissioned in an accessible/popular form.

a) There is clear and uncontestable evidence for example that the so-called Romano-Celtic temple site (AF2) is more extensive than that indicated in your desk-based archaeological assessment. This was provided by the 1999 excavation. We would welcome the opportunity to demonstrate on the ground the full extent of this site and point out places where remains are known to be very close to the surface.

b) The antiquarian evidence for a Roman presence is incomplete and in some cases inaccurate in your reports. It is not assembled into any coherent form, nor set against the proposed route of the Cross Country Event. If this were to be done it would be clear that your proposal to remove topsoil along the proposed route to the south of the temple site in order to preserve the acid grassland must run a high risk of disturbing more Roman material. This risk is not addressed in your reports and we would welcome the opportunity to discuss the matter with you.

c) The temple site became a Scheduled Ancient Monument on 1st December 2009, shortly after your application was submitted, and we should like to discuss with you the possibility of placing an exclusion zone round it similar to that suggested for the Saxon barrows.

3. The mitigating measures proposed in your reports are often unclear and do not, in the form in which they are presented, provide enough reassurance that the many sites of archaeological interest in the Park would be safe if the proposed Olympic events were allowed to go ahead. We suggest that since the full extent of the archaeological landscape is unknown the assessment of NIL effect once the mitigating measures suggested have been taken is open to debate and would welcome the opportunity to have this debate with you. We would also welcome clarification of terms such as "magnitude of effect" and "significance".

4. On the question of measures to be taken if previously unknown archaeological sites were to appear during the course of preparation for the Olympics you propose that recording such sites would be a sufficient recompense for the sites having been disturbed or in worst case destroyed. We would like to suggest that given the importance of Greenwich Park as a heritage site this matter should be open to wider discussion among the archaeological community than has been possible so far and a site meeting with you would go some way towards providing this.

We look forward to an early reply to our request for this meeting given that we have been given a deadline of 27th January to submit our objections to the planning application.

Yours sincerely,

Dermot Glynn  
NOGOE Coordinator

Cc Fred Brown Esq, London Borough of Greenwich  
Harvey Sheldon Esq, Birbeck College  
Julian Watson Esq  
Dr Jane Sidell, English Heritage

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APPENDIX C

**London Assembly Conservatives**

Compiled by Gareth Bacon AM

City Hall  
The Queen's Walk  
London  
SE1 2AA

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## **London 2012 - Equestrian Event Greenwich**

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A consultation with residents of the  
London Borough of Greenwich

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## Forward

Gareth Bacon AM – London-wide Assembly Member

### Listening to the voice of the people

It is no secret that there has been much controversy over the cost and location of a number of the proposed temporary venues for the 2012 Olympic Games. However, arguments between LOCOG<sup>1</sup> and the Mayor, or the Government and just about everybody else, is not what has prompted me to launch my own consultation with local residents about this particular venue. My motivation was twofold. Firstly, Greenwich Park is a fantastic local resource, and a unique historic location, exemplified by the fact that it is designated a “World Heritage Site”. Secondly, I am concerned from anecdotal evidence that Olympic organisers have not properly consulted local residents about the possible impact of holding the event in the Park, or adequately solicited their views on how to best mitigate any issues that could impact on their lives.

From the response rate that exceeded 10 percent, it is clear that local residents feel strongly about the event and its possible impact, whether they support the concept of it being held in the Park or not. It was evident that any consultation undertaken with local residents was at best patchy and selective, and that an information vacuum exists.

I hope this report will enlighten those involved in delivering the Olympics as to local feeling and concern, and encourage those stakeholders to revisit how they conduct consultation with residents. The opinions expressed in this report are genuine and deserve to be treated seriously by LOCOG, the Mayor and the professional sporting bodies.



Gareth Bacon AM

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<sup>1</sup> London Organizing Committee for the Olympic Games

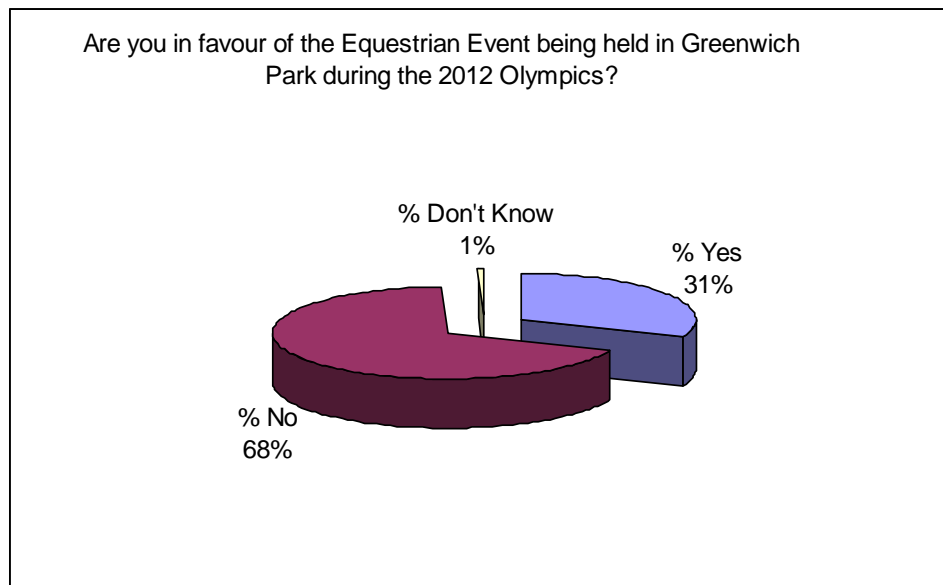
## Results and Methodology

A survey was sent out to three wards surrounding Greenwich Park. The three wards selected were Greenwich West, Blackheath Westcombe and Peninsula. In total 11,985 surveys were sent. These were either sent through the post or electronically on request. The total number of responses received is 1,267, a response rate of 10.6%. A copy of the pro forma is attached to the report as an appendix.

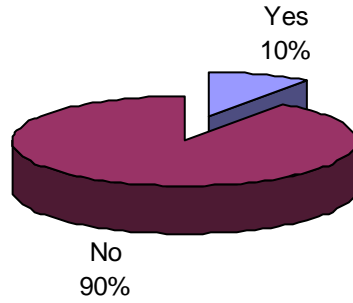
The following three questions (all of which were deliberately neutral in tone in order to elicit genuine responses) were asked:

- Are you in favour of the Equestrian Event being held in Greenwich Park during the 2012 Olympics?
- Have you received any communications from the Mayor or LOCOG about the possible impacts of the proposed venue within Greenwich Park?
- Have you been invited to or attended any public meetings regarding the Equestrian Competition to be held in Greenwich Park?

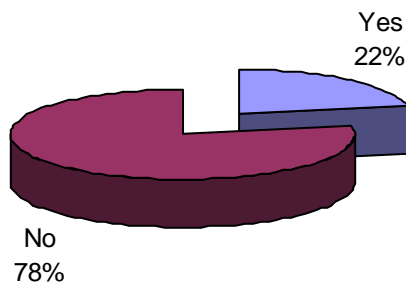
The following statistical results were generated based on survey returns:



Have you received any communication from The Mayor or LOCOG about the possible impacts of the proposed venue within Greenwich Park?



Have you been invited to or attended any public meetings regarding the Equestrian Competition to be held in Greenwich park?





## Residents Comments

Comments received from residents highlighted a number of reoccurring issues of concern.

### Environmental Impact

Many residents were extremely concerned about the possible environmental impact of holding the equestrian events in the Park, these ranged from damage to the ground and visual landscape to the potential felling of ancient oaks. Below are examples of typical comments received:

*“Greenwich Park is not designed for major equestrian events. I am concerned about the Long term impact of holding the events on the park (e.g cutting down trees, introducing a stable area for the horses etc)*

*“the most important reason for not having the equestrian competition is that the so called “pruning” of the trees, cutting down lower branches will change the face of the park forever-lower branches cannot be re-grown.”*

*“LOCOG is still in denial about potential damage to the ancient trees, failing to address the problem of damage to the root area by impact from horses’ hoofs and spectators feet”*

### Transport Impact

A chief concern of respondents was the possible negative impact on traffic and public transport, especially in light of the introduction of a designated Olympic route around the venue, which would mean roads being shut off to general traffic in order to allow exclusive access to Olympians and officials. The area around the Park is already plagued by severe congestion. Typical comments received:

*“...has no one thought about the impact on the residents locally who will possibly be faced with being unable to park in their own street, or get in and out of the area on competition days, either by road or rail. As residents the inhabitants of Greenwich would effectively be ‘under siege’ for as long as the competition takes place”*

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*“...congestion in the area is already a problem (in terms of the numbers of people already in Greenwich brought by boat, DLR, rail and by foot- not just by private vehicles). Transport and local facilities could not cope with the greater influx of people – to the detriment of local residents”*

*“The choice of Greenwich as venue can only have been made by a person or people who have never seen south London roads and have an extended fantasy that people travel to it and through it by public transport. Even minor accidents or road works induce major paralysis on the area. It is proposed to have priority lanes on local roads for vehicles carrying officials, VIPs and competitors. Where and how will these operate? Trafalgar Road and Woolwich Road are single lanes for a majority of their coverage. If public transport is so good for all of us and these are to be the ‘greenest games on record’ why cannot all people engaged in the activities use it?”*

### Economic Impact

Concerns were raised by respondents about the possible impact extended disruption and barred access might have on local businesses in Greenwich, especially as many shops and enterprises rely on the influx of tourism over the summer months in particular. Below are comments lifted from the survey responses that highlight this issue:

*“Tourism will drop off during the preparations/Olympics de-commissioning periods with people without tickets avoiding the area when the events actually take place. Why would a person choose to visit Greenwich during this time if they do not have a ticket – it would be like standing outside Wembley during Cup Final”*

*“...the cost to businesses as a result of traffic difficulties, and also the impact to me as a health worker having to commute across Greenwich everyday will be truly terrible.”*

### Lack of access

In the absence of definitive information available to the public at large, many of those surveyed were worried about the lack of access to the Park over a prolonged period. For many residents access to open space provided by the Park was an absolute necessity. Families living in social housing more often than not lack any personal open space in which to spend leisure time. The selected comments are a representative sample of the views of respondents:

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*“Our park is well used by ordinary people and is a rare haven of peace in busy London Life. I am horrified that such a short term temporary status-ridden excitement can threaten the calm and spiritual nature of a such a well-needed refuge for Londoners.”*

*“I was in the park today and it was busy with so many people (especially families) making the most of the park facilities. It would be very sad to see that all the enjoyment of these people will need to stop for a long period while a large proportion of Greenwich Park is made inaccessible due to the Equestrian Event.”*

*“I am fully in support of the 2012 Olympics generally, but from reading details on the London Olympics website it appears that the changes required to Greenwich Park to prepare it for the equestrian competition will mean that the park is closed for a significant period of time. This seems disproportionate to the benefit of holding the event in the Park ”*

#### Lack of consultation/information

A common theme from respondents whether they supported the event being held in Greenwich Park or were against, was the lack information on the plans and almost a complete absence of meaningful consultation with residents. This situation inevitably led to bad feeling about the event being held in the Park and rumours being passed off as fact in a Chinese whisper style in the absence of factual information. Overleaf are some quotes lifted from surveys that illustrate the views of residents on the issue of consultation and lack of information:

*“I also feel very left out of any consultation process (this survey being the only item received so far), and get the impression that the process is being shrouded in secrecy”*

*“Greenwich residents have not been adequately consulted about holding this event in Greenwich Park and have instead only been told that the decision has been taken before we have even been consulted.”*

*“There has been no information given to the general public about what will actually happen; how long will the park be closed before, and after? Will there be any long term changes? Will we be able to get into areas of the park during the Olympics? Will there be any true benefits of this process?”*

#### Positive Impact on Greenwich

Although a majority of respondents were concerned about negative impacts on the park, there was a significant minority who welcomed the events to Greenwich. Residents believed that

the exposure of such an event would put Greenwich firmly on the international map. Below are a number of typical positive responses that were received:

*“I am fully in favour of the Equestrian Event taking place in Greenwich Park. The setting would be unparalleled. This would place Greenwich as an historic landmark in the imagination of the world”*

*“I believe the Olympic Games will bring a tremendous boost to London and will benefit Greenwich in particular. Hopefully the ‘Barcelona effect’ will happen in 2012 as it did in 1992, bringing a lasting legacy for the whole region.”*

*“Absolutely 100% pro and in favour of the park being an Olympic venue... We live next to the park, use it everyday, but do not see it as ours in isolation. It is a public park, a royal park and should be shared... The Olympics will be a moment in time, but a moment that will create memories and experiences that will last a lifetime.”*

## **Conclusions & Recommendations**

The responses received as a result of this survey demonstrate two clear truths. Firstly, the vast majority of respondents, some 68% are opposed to the equestrian competitions being held in Greenwich Park. Secondly, the vast majority of all respondents (90% of those who completed the questionnaire) have received no information about the possible impacts of the event being held in its suggested location. A clear majority (78% of replies) have not been invited to any public meetings on the subject. These results clearly show that in the eyes of local residents the public consultation on the equestrian event has been woeful. LOCOG and the other Olympic and sporting bodies must understand that holding big “public events” or giving presentations to local societies is no substitute for trying to build a direct picture of the concerns of the majority of residents through questionnaires and surveys that are sent out directly. As happens in planning and licensing processes, residents affected in the locale would receive direct communications to solicit their views. Chairs of residents associations or conservation societies don’t necessarily represent the views of the wider populous. The lack of information forthcoming from Games organisers has clearly contributed to a misrepresentation of the likely impacts of the event, especially concerning environmental damage to the Park itself.

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The following recommendations should be adopted to rectify the lack of information and genuine consultation:

- During the planning process both Greenwich Council and LOCOG should ensure a full consultation process is carried out. This must involve local residents being contacted directly, not filtered through ‘interested third parties’.
- LOCOG should make available all relevant information available at local points of access such as libraries so the public can find out the truth about the plans for the event. They should also consider leaflet drops to residential areas surrounding the Park.
- LOCOG should consider revisiting their consultation strategy in a more general context, to ensure that this type of political climate is not generated at other temporary venue sites.

#### **Appendix 1 – Letter to resident and Pro Forma questionnaire**

Dear .....,

As you may be aware Greenwich is to be one of the host boroughs for the 2012 Olympic Games. One of the events taking place will be the equestrian competition. At present the plan is to hold the event within a temporary venue inside historic Greenwich Park.

This proposal has aroused controversy locally and nationally, and many conflicting stories have circulated about possible damage to the park, lack of public access before and after the Games, and the impact of re-routing traffic might have on residential roads.

As members of the London Assembly its part of our remit to look after the interests of Londoners, and to engage them in the governing process of the capitol. I would appreciate it if you took the time to complete the questionnaire overleaf, so we can ensure that local feeling and opinions are fed back to the Mayor and Olympic partners. Alternatively, you can email: [liz.thompson@london.gov.uk](mailto:liz.thompson@london.gov.uk) requesting an electronic version of the survey.

Yours Sincerely,

Gareth Bacon AM

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## GREENWICH PARK – EQUESTRIAN EVENT FEEDBACK FORM

(Please circle answers)

Are you in favour of the Equestrian Event being held in Greenwich Park during the 2012 Olympics?

YES NO

Have you received any communication from The Mayor or LOCOG about the possible impacts of the proposed venue within Greenwich Park?

YES NO

PLEASE GIVE DETAILS BELOW:

Have you been invited or attended any public meetings regarding the Equestrian Competition to be held in Greenwich Park?

YES NO

We would appreciate any additional views or comments about this issue to feed into the process: