

Mr Fred Brown
Development Control
Greenwich Council – Directorate of Regeneration, Enterprise and Skills
Crown Building 5th floor
48 Woolwich New Road
London SE18 6HQ

27th January 2010

Dear Mr Brown

LONDON 2012 OLYMPIC GAMES: TEMPORARY USE OF THE SITE OF GREENWICH PARK, NATIONAL MARITIME MUSEUM, THE OLD ROYAL NAVAL COLLEGE AND BLACKHEATH CIRCUS FIELD FOR THE HOSTING OF THE EQUESTRIAN AND MODERN PENTATHLON EVENTS

APPLICATION NUMBERS 09/2598/F & 09/2599/L

ICOMOS-UK has considered these applications in relation to their impact on the Maritime Greenwich World Heritage site.

We consider that the application **SHOULD NOT BE APPROVED** as the information in the extensive documentation submitted with the applications does not offer satisfactory evidence that the proposals will not impact adversely on the Outstanding Universal Value (OUV) of the Maritime Greenwich World Heritage (WHS) site. Our detailed reasons are as follows:

1. *Maritime Greenwich World Heritage site*

The two proposals lie within the WHS of Maritime Greenwich, or within its Buffer Zone (Blackheath Circus Field site). Maritime Greenwich is internationally acknowledged as being of OUV through its inscription on the World Heritage List in 1997 as a cultural WHS.

In signing and ratifying the Convention Concerning the Protection of the World Cultural and Natural Heritage (World Heritage Convention, 1972), the UK Government is committed to sustaining the OUV for which WHSs in the UK are

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inscribed on the World Heritage List, through protecting the attributes that convey OUV. The permanent protection of the world's cultural and natural heritage is of high importance for present and future generations and to this end the UK government is committed to the identification, protection, conservation, presentation and transmission of its WHSs to future generations, in accordance with Article 4 of the World Heritage Convention.

The current application covers a substantial part of the Maritime Greenwich WHS and will impact on a significant number of attributes of its OUV. The OUV of the Maritime Greenwich WHS, together with the attributes that convey OUV, are set out in an approved Statement of OUV/Statement of Significance.

ICOMOS-UK considers that a fundamental part of the justification for the planning proposals should have been to cite the appropriate planning constraints for the WHS and to set out in the Environmental Impact Assessment (EIA), using appropriate methodology, the impact of the proposal on the WHS as a whole. In our view, neither of these has been done satisfactorily in the applications.

2. *Planning Circular 07/09: Protection of World Heritage Sites*

Planning Circular 07/09: Protection of World Heritage Sites has not been cited and no mention is made of obligations contained within it.

Although the Environmental Statement (ES) acknowledges that the planning area falls almost entirely within the WHS, paragraph 9.2.1 to 9.2.3 fail to set out the planning constraints arising from WHS Status –as is done for the planning constraints related to the inclusion of the Park in the Register of Parks and Gardens.

Circular 07/09: Protection of World Heritage Sites sets out clearly that:

“The outstanding universal value of a World Heritage Site indicates its importance as
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key material consideration to be taken into account by the relevant authorities in determining planning and related applications² and by the Secretary of State in determining cases on appeal or following call in. It is therefore essential that policy frameworks at all levels recognise the need to protect the outstanding universal value of World Heritage Sites. The main objective should be the protection of each World Heritage Site through conservation and preservation of its outstanding universal value.”

Furthermore the Circular states that WHS status is a key material consideration, as are relevant policies in WHS Management Plans:

“The Secretaries of State for Communities and Local Government and for Culture, Media and Sport expect planning authorities to treat relevant policies in [World Heritage site] management plans as key material considerations in making plans and planning decisions”

3. ***Environmental Impact Assessment (Environmental Statement)***

A key role of the Environmental Impact Assessment (EIA) is to assess the impact of the proposals on heritage assets of value. As the WHS is the highest value heritage asset related to the development, the EIA should have considered the impact of the development on the WHS as a whole, through considering impact on the OUV of the WHS and on the attributes that convey OUV.

ICOMOS-UK does not consider that the EIA has satisfactorily achieved this. The WHS is not listed as a discrete cultural heritage resource to be considered by the EIA, and thus the impact of the proposals on the WHS as a whole has not been considered.

3.1 WHS as a Cultural Heritage Resource

The Cultural Heritage resources considered by the EIA are set out in Appendices 9A, B and C. These are:

- Archaeological resources – generally (though some may be visible) buried monuments, features and deposits of cultural heritage significance (Appendix 9A).
- Built heritage assets – standing buildings and structures of cultural heritage significance (Appendix 9B).
- Historic landscape elements – visible or documented features representing the development of the landscape of the study area over time which are therefore of cultural heritage significance (Appendix 9C).

Under Archaeological Resources, although the WHS is mentioned, its Statement of OUV is not listed (although the justification for the listing of the Park as a designated Park and Garden is given).

Under Cultural Heritage Resources, the OUV of the WHS is not identified nor is the Statement of OUV listed.

Under Historic Landscape elements, although it is acknowledged that the whole site is a WHS, and thus of high significance, the Report then goes on to detail specific features within the WHS that are of very high, high, medium, low or uncertain significance and consider impact on these alone, without relating these to attributes of

OUV. Mention is made of ancient trees and avenues but no detailed visual plans are provided of the overall spatial pattern relating to trees and their relevance to the structure and history of the Park, or to OUV. The Statement of OUV is not listed. Furthermore the term historic landscape – although the application area as a whole is both part of a WHS and Grade 1 Park and Garden - is shown in figure 9G 4B as applying to only part of the application area.

Thus no assessment has been attempted of the impact of the proposals on the OUV of the overall WHS – instead impact has been considered only on individual elements of the WHS, and not on the overall spatial pattern of the Park landscape, nor on the relationship between individual elements and the WHS.

In ICOMOS-UK's view what has been covered in the EIA does not provide a satisfactory assessment of the impact of the proposals in relation to the international value of the overall WHS, which reflects the fact that the sum of all the parts of the property is far higher than the value of individual elements.

Similarly, we consider that the cumulative impact of all the proposed interventions, in space and time, is far higher than the impact on individual elements. The cumulative impact has not been considered.

In conclusion, ICOMOS-UK considers that the EIA has not assessed the overall impact of all the cumulative proposals on the OUV of the overall WHS – including its authenticity and integrity. As this has not been achieved, we therefore do not have a clear statement of the overall impact on the WHS, both in the short and longer term.

ICOMOS-UK is concerned that the EIA did not undertake an appraisal of the impact of the proposals on the OUV of the overall WHS, both in terms of immediate and longer term impacts, in relation to the full obligations of WH status, and thus, in our view, the EIA has not fulfilled what is needed in terms of a formal assessment of the impact of the proposals on the highest grade of heritage asset affected by the proposed development.

We nevertheless consider that your Authority must be in a position to consider the overall impact of the proposals on the WHS as a whole. Further impact studies do therefore in our view need to be provided to achieve this before a decision can be made on the current applications. And these further studies will need to be underpinned by more detailed information – see para 4 below.

4. *Evidence presented in the application*

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Although the proposal to use Greenwich Park has been considered for over two years, the amount of detail provided in the application as to precisely how the Park will be used, on the degree of intervention and the scope and extent of the heritage assets is very unclear. No satisfactory details are provided for the following:

- The foundations of the temporary arena and vehicular access to it
- The construction of security fences
- Precise surveys of individual trees, avenues and vistas
- Surveys of underground conduits, areas sensitive for buried archaeology, including the extent of evidence for Le Notre's parterre
- The precise impact of the cross country course on individual trees, avenues, vistas, and buried archaeology
- The precise way heritage features will be affected or are at risk
- The precise interventions in terms of fertilisation and re-seeding and areas to be fenced off.
- The optimum carrying capacity for the Park overall and in specific sections, and how this relates to anticipated numbers
- Where visitors to the cross country course will be accommodated
- A restoration strategy for the Park, which is said not be fully restored to its current state after the Olympics until 2015
- The precise area of the park to be closed off from February or March 2010
- The detailed overall programme for Olympic-related works and closures in the Park over the anticipated five years.

ICOMOS-UK considers that before a more detailed EIA can be carried out on the WHS, precise surveys need to be provided showing the disposition of all trees, underground channels and other identified areas for buried archaeology, and precise details provided of the structure of the arena and access to it, the layout of the cross country course, the interventions proposed to the cross country course, visitor arrangements for the cross country event, the restoration strategy for the Park, and the overall programme for works and closures in the Park.

5. *Overall Impact*

The ES states (on the basis of assessment of impact on individual heritage assets rather than on the WHS as a whole) that the overall permanent impact on the park's heritage features is assessed as "likely to be neutral to slightly adverse" and the ES admits that some heritage features could suffer permanent "loss or partial loss." (ES introduction, page 10).

The ES states that:

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- Most features will be protected by mitigation (protective structures and the like). But “as a last resort,” some heritage features will be “preserv[ed] by record,” i.e. permanently destroyed, but only after pictures and records have been made of them. (ES introduction, page 10). No details are provided of which heritage features will be protected, or which will suffer partial or complete loss.
- Seventy-two trees will be pruned to allow an 11-foot clearance for horses to pass underneath, including a “small number” which will suffer “removal of branches to the main stem.” The majority of pruning would be to branches of 25mm or less, although a number would be up to but not more than 50mm. (ES 12.6.9). No details are provided as to which trees will be affected.
- There will be temporary power plants, water and fuel tank compounds (ES 3.2.52-5). Temporary ducts will be dug across the park to divert some existing gas, water and sewage mains pipes which currently pass under areas needed for the competition (ES 3.2.61).
- On balance, the overall magnitude of change is considered to be medium adverse resulting in a moderate adverse effect.” (ES 12.6.14)
- The works on the cross-country course will involve installing a “covered and above ground” irrigation system.
- The soil would also be loosened by driving large spiked rollers across it; the spikes would be up to 12cm long. Fertilisers and herbicides would be applied and the course would be seeded with ryegrass from March 2010 onwards. (ES 3.4.3- 13.)
- The acid grassland in the park would need until 2015 to recover and would probably be fenced off during that time.
- The amenity grassland would be fenced off until spring 2013. (ES pages 27-30).

On the basis of the evidence provided in the ES and the EIA, and in the absence of a formal assessment of impact on the overall WHS, and in the absence of adequate surveys of some key features, ICOMOS-UK considers that the development, if permitted, would have a substantial negative impact on the attributes of the WHS that convey its OUV, through impacting adversely on the integrity and authenticity of the Park landscape which is a highly sensitive web of inter-connected features that overall make up a landscape of outstanding international importance. It is not adequate to say that impact to certain features, whether trees, grassland, buildings or archaeology is only minor when considered individually. For a WHS, it is essential that impact on the integrity of the whole is considered – that is on the inter-relation between the various parts, and also on its authenticity – that is the ability of all the attributes collectively to convey the overall OUV.

6. *Legacy:*

The ES admits that “the extent to which legacy benefits are generated by the Greenwich Park Events rather than the 2012 Games as a whole is not clear”. There is mention in the application of possible improvements to the children’s play area but no details are provided. ICOMOS-UK do not consider that interventions in terms of a children’s play area would be an appropriate historic legacy, nor in any way commensurate with the scale of the Olympic event, nor necessarily appropriate to the significance of the assets involved in this application, and its impact on the local community.

While it is suggested that holding the Olympics at Greenwich would increase public awareness of the WHS and increase the numbers of people visiting and seeing the WHS – in line with the aspirations of the WHS Management Plan, (even though there are currently around 4 million visitors to Greenwich each year) there is nothing in the current application to suggest that this will happen – in fact from the details and statistics given rather the opposite would seem to be the outcome. Fewer local people will be able to make use of the Park, because of the planned closures to parts of it, and fewer tourists are likely to visit, if the impact of the London Marathon on Greenwich and of the Olympics on Athens are guides. Also, as the overall size of the area of Greenwich Park to be used for the cross country event is roughly half that of the space used at Badminton, and as the proposed course winds its way around most of the available area, there appears to be little space for spectators outside the main loop of the course.

ICOMOS-UK considers that if such a major intervention is to be considered in a WHS, then not only should the impact on the attributes of OUV be demonstrated as being benign, but the longer term legacy should also be shown to be beneficial to the asset as well as to local communities and to the visiting public.

7. *Summary*

ICOMOS-UK considers that a fundamental part of the justification for the planning proposals should have been to cite the appropriate planning constraints for the WHS and to set out in the EIA, using appropriate methodology, the impact of the proposal on the WHS as a whole. In our view, neither of these has been done satisfactorily in the applications.

ICOMOS-UK is concerned that the EIA did not undertake an appraisal of the impact of the proposals on the OUV of the overall WHS, both in terms of immediate and longer term impacts, in relation to the full obligations of WH

status, and thus, in our view, the EIA has not fulfilled what is needed in terms of a formal assessment of the impact of the proposals on the highest grade of heritage asset affected by the proposed development.

We nevertheless consider that your Authority must be in a position to consider the overall impact of the proposals on the WHS as a whole. ICOMOS-UK considers that before a decision is made on the application, the EIA needs to be augmented by carrying out a full appraisal of the overall impact of the development proposals on the OUV of the overall WHS.

ICOMOS-UK further considers that before a more detailed EIA can be carried out on the WHS, precise surveys need to be provided showing the disposition of all trees, underground channels and other identified areas for buried archaeology, and precise details provided of the structure of the arena and access to it, the layout of the cross country course, the interventions proposed to the cross country course, visitor arrangements for the cross country event, the restoration strategy for the Park, and the overall programme for works and closures in the Park.

On the basis of the evidence provided in the ES and the EIA, and in the absence of a formal assessment of impact on the overall WHS, and in the absence of adequate surveys of some key features, ICOMOS-UK considers that the development, if permitted, would have a substantial negative impact on the attributes of the WHS that convey its OUV, through impacting adversely on the integrity and authenticity of the Park landscape which is a highly sensitive web of inter-connected features that overall make up a landscape of outstanding international importance. It is not adequate to say that impact to certain features, whether trees, grassland, buildings or archaeology is only minor when considered individually. For a WHS, it is essential that impact on the integrity of the whole is considered – that is on the inter-relation between the various parts, and also on its authenticity – that is the ability of all the attributes collectively to convey the overall OUV.

We consider that the application **SHOULD NOT BE APPROVED** as the information in the extensive documentation submitted with the application does not offer satisfactory evidence that the proposals will not impact adversely on the OUV of the Maritime Greenwich WHS site. The Council should request the applicants to provide, as a matter of urgency, the supplementary material suggested above, in order that a fair, balanced and detailed assessment can be made of the impact of the proposals on the OUV of the WHS.

ICOMOS-UK considers that if such a major intervention is to be considered in a WHS, then not only should the impact on the attributes of OUV be demonstrated as being benign, but the longer term legacy should also be shown to be beneficial to the asset as well as to local communities and to the visiting public.

The landscape of the Maritime Greenwich WHS is of international renown. It is essential that it is not compromised for short-term benefits.

Yours sincerely

Susan Denyer
Secretary ICOMOS-UK