

NOGOE

No to Greenwich Olympic Equestrian Events
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F Brown Esq
Planning Department (comments on applications)
London Borough of Greenwich
Crown Building
48 Woolwich New Road
London
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27th January 2010

Dear Mr Brown,

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

In the second part of our submissions by way of objection to LOCOG's planning applications, we propose to supplement some of the reasons for objection expressed in our letter dated 13th January with supporting evidence. This letter and its appendices should be read in conjunction with our previous submissions.

Introduction

1. Our principal proposition is that there is no planning policy that states that a project of international prestige should be put into a special class of planning application to which normal considerations do not apply. If the Government had thought that it should have been otherwise in relation to Olympic events in Greenwich, it would have asked Parliament to extend the provisions of section 5 of the Olympics Act 2006 so that the ODA would have been the planning authority, enabled to apply particular Olympics considerations to the applications.
2. The point applies with possibly even more force in respect of an application for temporary permission, where, as is the case of Greenwich Park, the applicant has acknowledged that there is some risk of permanent damage and the prospect of long term harm. The full extent of the harm is impossible to assess at present, due to the lack of detailed information, which is most surprising, given that the Bid was won 55 months ago. But even if it had been provided, there would remain the inherent uncertainties of managing contractors and administering an event such as is proposed in a totally unfamiliar, but highly sensitive, location, subject no doubt to tight budgetary controls and a finite amount of time in which to carry out the work. With the best will in the world, contractors do not always take the care that they are expected to take.

Patrons:

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3. As we submitted in our previous letter, the starting point for consideration of LOCOG's application is that permission should be refused. In this letter, we propose to set out evidence which we believe will demonstrate the unreliability of many of LOCOG's assertions that, in effect, all will be well.
4. In general terms, the statutory and other government bodies that have been consulted by LOCOG appear to recognise that to use the Park as proposed is not without risk, but appear to be satisfied by:
 - LOCOG's promises to undertake further surveys and investigations, in the light of which final decisions on the layout of the facilities are to be "agreed"; and
 - LOCOG's continued assurances that the Park will be returned in the same, if not an improved, condition¹.
5. What could perhaps be regarded as complacency as to potential adverse consequences by such bodies in the light of the undoubted political pressure to grant permission² should be contrasted with the objections to the use of the Park by independent expert bodies such as the Garden History Society (a statutory consultee that was not consulted), the Woodland Trust, the London Wildlife Trust and Rescue, The British Archaeological Trust. We are sure that the Planning Board will be mindful of the fact that there is serious, independent and well informed opposition to what is proposed.
6. We adopt all that these organisations have said and have engaged other experts to consider the threat to various aspects of the Park's Roman, Saxon and recently discovered Tudor archaeology (our report is endorsed by two leading experts in the field, Harvey Sheldon FSA and Julian Watson DMS MCLIP) and issues arising out of the conduits that lie beneath. We summarise the position below and detailed reports are annexed. We have also carried out our own research on the following topics:
 - Ecology
 - Provision for spectators on cross-country day
 - Socio economic issues (ES Section 14)
 - The reaction to the proposals by local residents.
7. It is not as if there were mainly positive benefits to the holding of events in the Park. If there were, one, or possibly two, significant disbenefits might not have been enough to tip the balance in favour of refusing permission, taking account of the exceptional nature of the application. But there are no material benefits either to the fabric of the Park (other than a jump for the Children's Playground and a theoretical increase in acid grassland in five years time, if the unproven method for replacing and extending it is successful), or

¹ See for example the GLA's Planning Report dated 20th January, para 34: "*the applicant has committed to mitigate the potential harm from the temporary use, fully reinstated (sic) the parkland and enhance the amount of acid grassland*" (as to which, see our comments in para 17 of our 13th January letter and Annex D to this letter).

² For example, the Rt Hon Tessa Jowell, in a radio interview ("You and Yours" on 27th October 2009), said that the decision to hold equestrian events in Greenwich Park had been taken and that it was not going to be changed.

for local residents and visitors.

8. Apart from it being an Olympic event, there would no upside. There would, however, be many downsides, by no means the least of which is the fact that local residents would be denied access to large parts of the Park for many months (and, in two cases – the parterre and the acid grassland for up to two and five years respectively), while most of the Park is to be criss-crossed by the track of the cross-country course, onto which access will not be permitted for over three years.
9. We have previously remarked on the prematurity of the application, the mass of information still to be provided and the “agreements” that have still to be made. We therefore consider that it would be fundamentally wrong to grant permission either on an outline basis or subject to conditions and reservations. If such a course of action were to be adopted, we think that, having regard to the pressures of time and capacity that all concerned would be under to ensure that the Park was ready for the Olympic Opening Ceremony, corners would be cut, there would be insufficient safeguarding and it would be impossible to ensure that all conditions imposed and matters reserved would be adequately dealt with. In effect, LOCOG would have been given carte blanche to use the Park as it wished.
10. There are alternative venues, of which the most obvious is Windsor, with existing facilities (in particular the Field of Play), which could be used. Windsor is a well known venue for world class equestrian events and the Council has a duty to consider whether an alternative site would be more appropriate. All the more so in circumstances in which a temporary event will cause moderate to serious inconvenience over five years to users of the Park and long term harm to the Park and the prospect of permanent damage to its fabric. We dealt further with this issue in our previous letter.

Archaeology

11. Greenwich Park is one of the most important heritage sites in the world lying within the Maritime Greenwich World Heritage site. *[Such] 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* (see Planning Policy Guidance 15).
12. The following is a summary of the principal points made in our statement of evidence on the archaeological issues. The full statement, together with letters of endorsement by Messrs Sheldon and Watson are set out in Annex A to this letter.
13. There are 79 sites of archaeological interest listed in the ES. However, much of the archaeology underneath the Park remains to be investigated: there has been no time pressure to do this as the remains were thought to be safe, situated as they are within a Royal Park. It is thought that many of the remains lie just beneath the ground.
14. Certain of the remains in the Park are of great significance, for example:
 - The Romano-Celtic temple site has the highest possible archaeological status and has just been declared a Scheduled Ancient Monument. There are other Roman remains in

the south-east section of the Park, and an area between them and the temple, where it is likely that further Roman remains will be found. The cross-country course criss-crosses this area. In addition it passes perilously close to the temple site. 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 Saxon remains are also of the highest importance. A spectator exclusion zone has been placed around these, but the cross-country passes through this zone, and appears to run right over one of the smaller barrows.
 - A new archaeological site has very recently appeared through the surface of the Park which may well be the remains of a Tudor building. This site needs to be protected by an exclusion zone as its condition is very fragile. The fact of its appearance in a place not previously thought to be of any particular interest underlines the contention of English Heritage (RCHM, 1994 p1) that important archaeological remains can appear at any time in any part of the Park.
15. The scale of the mitigation measures proposed illustrates the unsuitability of the Park as a venue for a sporting event of this kind.
16. Finally, with the huge amount of construction activity which will go on in the Park over a period of years, it is inevitable that archaeological remains will be dug up, will not be recognised as such, and will therefore be lost.

Conduits

17. The following is a summary of the statement of evidence by Dr. Per von Scheibner, a local industrial archaeologist who has made extensive investigations on the conduits beneath and adjacent to the Park for many years. His statement comprises Annex B to this letter and includes photographs of conduits and inspection covers.
18. There are many conduits beneath the Park. They were designed to collect subterranean water and bring it to the Palace of Placentia and subsequently to Greenwich Hospital (later the Royal Naval College) and surrounding buildings on or near the river. The conduits were built of brick, were about 4 to 6 feet high and 2 to 4 feet wide; they are anything from a few inches up to 30 feet below ground level. At intervals of about 10 yards inspection shafts were placed down the whole length of the conduit. Some conduits begin outside the Park.
19. None of the medieval conduits has ever been found, although they are known to have existed. Three of the Tudor conduits which supplied Placentia are known to Dr Scheibner. At least 12 conduits were built in the 1600 and 1700's to supply Greenwich Hospital. The whereabouts of seven of these is unknown. There are no exact plans of the whereabouts of the inspection covers of the newer conduits and none of the older conduits.
20. In order to locate all the conduits and their inspection covers, with a high degree of certainty it would be necessary to produce a 2 foot grid of boreholes across the entire Park.

21. The principal dangers from the conduits are the following. They have not been maintained for centuries. Therefore sand can get washed into them from the outside, thereby creating an external void; this can lead to the collapse of the conduit wall with a consequent increase in the size of the void. In addition, most of the inspection covers are now hidden from view, their original covers having been replaced by slates, breeze blocks or similar unsatisfactory alternatives.
22. There was a spectacular collapse of a conduit about 20 years ago. This occurred at a property in Point Hill. The conduit itself led into the Park. The collapse was coincidentally recalled by Louis Buss, the son of the then owner of the property affected in his email of objection (Annex C).
23. Apart from conduits, there is evidence of other underground workings in the Blackheath and Greenwich area and the presence of chalk-mines, wells, and ice wells have all been recorded, with a fair number of subsidences.
24. The conduits are acknowledged in the ES to be archaeological features of “high importance”.
25. The cross-country will involve 75 horses and riders and 75,000 spectators. If the event were to be allowed to take place, large areas of the Park would become a building site for a lengthy period, with large structures being erected or dismantled and heavy equipment moving around the Park. This would involve a substantial increase of traffic and weight from above.
26. There are the significant risks of collapse of conduits because of the presence of voids and the giving way of the capping of inspection shafts, both of which would involve considerable risks to life and limb of humans and animals. There is also the risk of damage to the conduits themselves.
27. Any of the above could occur at any time in any part of the Park. The events planned in the Park would create risks for the public and the participants, which cannot, in Dr Scheibner’s expert opinion, be justified.

Ecology

28. In our previous letter, we briefly set out our concerns about various aspects of the Park’s ecology. We would refer you to those as well as the letters of objection that have been submitted in particular by the Woodland Trust, Mrs Pat Bullivant and the London Wildlife Trust.
29. Annex D contains an account of research that one of our members has carried out in relation to acid grassland, and stag beetles and bats (both of which are protected species as you will no doubt know).
30. The key concern in relation to the acid grassland is that not only is the proposed remediation an unproven technique, but scientific research has established that storage of the soil for even a short period affects its qualities and it would not be possible to return

the soil in the same condition in which it was dug up, thereby compromising what is in any event an “experiment”.

31. As for stag beetles and bats, both of which are European Protected Species (EPS), LOCOG has failed to carry out any (or any appropriate in the case of bats) survey so far and criminal sanctions would apply if proper procedures are not carried out. In any event, it would seem that, in regard to bats, LOCOG would be unable to satisfy the three tests that need to be satisfied to allow derogation to be granted from the protection afforded the species.

Provision for Cross Country Spectators

32. In our short report (Annex E), we identify the numerous facilities that would be required, but have not been indicated on the plan of the course or clearly mentioned in the ES. We refer to the constraints that spectators will be under and the very limited space that will be available to them (we calculate that if spectators were to be spread evenly across those parts of the Park that can be used, each would have less than 2 metres square to stand on). As yet, no plan for managing the spectators has been provided.

Socio economic issues (ES Section 14)

33. Our paper for this section (Annex F) has been prepared by Dermot Glynn, an economics consultant, amongst other appointments, former head of economics at the CBI and KPMG, and Russell Vallance, a research analyst, previously holding directorships in, amongst others, the Arts and Tourism sectors (specialising in marketing and fund raising). Both individuals are members of NOGOE.
34. In Section 14 of the ES, LOCOG makes two claims regard to the economic and social effects of its proposals for Greenwich Park, both of which are unsustainable (Annex E). The mistaken claims are:
- that Greenwich Park is a “cost effective” venue; and
 - that holding the equestrian events there would have a positive net economic benefit to Greenwich.
35. In contrast, the paper argues:-
- Greenwich Park is *not* the most cost-effective venue and, of the alternatives considered, Windsor is the most obvious cost-effective venue. Unlike Greenwich, there are already equestrian facilities at Windsor, and improvements could be left as a positive legacy from the Games.
 - Modern Pentathlon requirements are modest, are not tied to the equestrian stadium and can be efficiently catered for elsewhere in the Borough.
 - The holding of the Olympic equestrian events in Greenwich Park would not have a positive net economic benefit to Greenwich but, to the contrary, would result in short-term economic damage to Greenwich town by reducing the numbers of tourists outside the stadium and deliver no long-term economic benefits.
 - From LOCOG’s figures, holding the equestrian events in Greenwich would result in the loss of a number of existing jobs, while generating few, if any, construction job

vacancies within the Borough and provide no more than 200 temporary paid jobs for local people on arena days.

- The post-event demolition of the facilities proposed for Greenwich Park will leave no social or economic legacy for the people of the Borough.

36. As an alternative to LOCOG's proposals it is suggested that the Park could be used as a place which members of the public could visit to watch events from across the Games on large screens. It would thereby become a central focus for residents of Greenwich and others, including foreign visitors to enjoy both the Olympics and the other attractions that Greenwich has to offer in a relaxed and enjoyable atmosphere.

The reaction to the proposals by local residents

37. Many local residents are strongly against the proposals. Testimony to this is:

- the 13,500 signature petition that was presented to the Council in October 2009 ;
- a public meeting attended by over 200 hundred local people on a Sunday afternoon in January 2010, at which the overwhelming majority demonstrated their opposition; and
- s the many objections that you will receive to the applications; we estimate that they will be well over a thousand.

38. But more than making the simple statements set out above, we would ask you to bring to the specific attention of the Planning Board the small selection of extracts from letters/emails of objection by local residents, which are set out in Annex G. They express some very personal views as to the effect that closure of the Park would be likely to have on their lives. Would you also please ask members to view the film (preciously sent to every councillor), which was made last summer and well demonstrates the enjoyment that local people gain from using the Park and their concerns about the prospect of its closure. I enclose a further copy, which I am sure that you will be able to duplicate, if necessary.

Conclusions

39. Having regard to the contents of our previous letter and the evidence of harm that is submitted with this letter, we repeat our request that the Planning Board should reject LOCOG's applications.

Yours sincerely,

John Hine
Coordinator

Dr Jane Sidell, English Heritage
Robert Creber Esq, LOCOG
Kim Hoffman, Senior Strategic Planner, London Assembly