

Date: 26 Jan. 10
Our ref: BO5/2-10/11-1

Directorate of Regeneration,
Enterprise and Skills
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The logo for Natural England, featuring the words "NATURAL ENGLAND" in a bold, sans-serif font. "NATURAL" is in white and "ENGLAND" is in a dark green color, both set against a light green rectangular background.

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For the attention of: Fred Brown

Your reference: 09/2598/F

Dear Mr Brown,

Proposal: The temporary use of the site for hosting of the Equestrian and Modern Pentathlon events for the London 2012 Olympic Games.

Location: Land at Greenwich Park, National Maritime Museum, the Old Royal Naval College, Greenwich and Blackheath Circus Field, Blackheath SE3

Thank you for consulting Natural England on the above proposal. Your letter was received by this office on 10 December 2009.

On the basis of the information provided, Natural England considers that works relating to the development will have a significant impact on the lowland acid grassland habitat found at Greenwich Park. However, Natural England is not objecting to the application as an outline method statement: Habitat Enhancement Areas – Acid Grassland Within Greenwich Park has been submitted by the applicant which demonstrates that there will be no net loss of acid grassland.

Lowland acid grassland is a UK, London and Greenwich Biodiversity Action Plan priority habitat and is of Regional ecological importance. In addition it is also a Habitat of Principal Importance for Conservation under Planning Policy Statement 9 (PPS9) and therefore a material consideration in planning.

The following operations for improving grassland for the preparation of the cross country course may, in particular, result in the degradation and loss of the existing resource and should be minimised:

- Irrigation using nutrient rich, alkaline mains water
- Leaving mowing arisings in situ
- Use of fungicides
- Use of herbicides to control 'weed' species
- Increased mowing frequency

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- fertiliser application
- seeding with perennial ryegrass
- herbicide use

Other activities highlighted in the Environmental Statement including the movement of vehicles during set up and removal of event facilities and movement of spectators and competitors during the Greenwich Park Events may also have a significant impact on the acid grassland resource.

To mitigate for acid grassland habitat loss, avoid impact on other biodiversity features and to ensure a lasting natural heritage legacy, Natural England asks for the following conditions to be attached to any permission granted for the development:

- Minimisation of operations (listed above) likely to have an impact on acid grassland habitat
- Implementation of the method statement: Habitat Enhancement Areas – Acid Grassland Within Greenwich Park. This outlines the methodology for restoring degraded habitat to good quality acid grassland and identifies areas for treatment.
- Provision of a detailed acid grassland management plan. The plan should detail the methodology for mitigating habitat loss as well as the provision of compensatory habitat. The plan should ensure that there is at least no net loss of good quality acid grassland habitat at Greenwich Park but should also include off-site habitat restoration as a lasting legacy of the Games. This plan will be agreed with Natural England and The Royal Parks.
- Movement of vehicles should be restricted to amenity grassland areas only and avoid areas of acid grassland identified in the NVC survey.
- The setting up of an advisory Group to formally oversee the restoration and enhancement of Greenwich Park. Membership should include Natural England, The Royal Parks and English Heritage.
- An investigation of the success of habitat mitigation and restoration of acid grassland habitat should be commissioned. This will include survey and monitoring of restoration areas on an annual basis for at least five years post games. The report will be published to inform similar projects.
- No trees should be felled.
- The cross country course, public access routes and support facilities should avoid the root zones of all trees and at least the area under the tree canopy.
- To avoid impacts on bat roosts, artificial lighting should be minimised and restricted to essential security and access lighting only. Event set up and removal should therefore only take place during daylight hours. Any lighting should be designed in accordance with the Bat Conservation Trust and Institute of Lighting Engineers guidance (2008).

Under section 40(1) of the *Natural Environment & Rural Communities Act 2006* a duty is placed on public authorities, including local planning authorities, to have regard to biodiversity in exercising their functions. Further, the potential impact of development on certain species and habitats of principal importance is addressed in detail under regulation 3(4) of *The Conservation (Natural Habitats &c.) Regulations 1994* and section 74 of the *Countryside & Rights of Way Act 2000*. These duties and others are set out in detail in the

legal *Circular 06/2005* to *PPS9 'Biodiversity and Geological Conservation'* . We urge the Council to bear the above legislation and guidance in mind when considering this application.

We note that One Planet 2012, London 2012's Sustainability Plan, stresses Biodiversity as a key theme. The aspiration is to conserve and enhance biodiversity at all the London 2012 venues, including Greenwich, leaving a lasting legacy from the London 2012 Olympic and Paralympic Games.

If you have any queries relating to the content of this letter, please contact me at the above address.

Yours faithfully

Paul Losse
Senior Specialist (Land Management and Conservation)