

## **SAVE SOUTHWARK WOODS' OBJECTIONS**

### **TO LONDON BOROUGH OF SOUTHWARK'S FACULTY APPLICATION TO DEVELOP AREA Z AT CAMBERWELL OLD CEMETERY**

The following objections are in the context that Southwark LBC already started work on 1<sup>st</sup> February 2016 felling trees and clearing undergrowth across site Area Z.

#### **AREA Z CAMBERWELL OLD CEMETERY**

Area Z at Camberwell Old Cemetery is 2.5 acres of Metropolitan Open Land and a Site of Borough Importance for Nature Conservation, on the South London Green Chain Walk in East Dulwich, London Borough of Southwark. Southwark LBC's Woodland Management Plan and Conservation Management Plan for Camberwell Old Cemetery includes Area Z.

Area Z has a mixture of ancient and veteran trees, including oaks over 300 years old, mature woodland with trees of more than 50 years old, and secondary woodland which has grown after over illegally dumped construction waste over the last 13 years, including typical native broadleaf woodland species, as well as wild pear and other trees.

Area Z is home to a wide range of species and habitats and its wilder character is rare in London.

Area Z includes the graves of 48,000 people's graves, called public or paupers' graves, as well as six areas of Commonwealth War Graves and 30 or more private graves.

#### **SOUTHWARK LBC PROPOSALS FOR AREA Z**

Southwark LBC propose to fell hundreds of trees across 2.5 acres of Camberwell old Cemetery, known as Area Z, on both consecrated and unconsecrated ground.

Southwark LBC then propose to excavate approx. 12,000 tonnes of soil and rubble, on the basis of illegally dumped construction waste in 2003. Approx. 8,000 tonnes are to be processed on site via what the Council has called 'quiet machinery' and approx. 4,000 tonnes trucked off site with permission for up to 50 truck journeys per day.

The land is to be remodelled in terraces with vehicle access roads for 740 private burial plots.

Southwark LBC proposes two large water tanks which are to receive storm water run-off from the site in heavy rains.

The area of woodland along the perimeter of the site is to become a sustainable drainage area and receive storm water overflow, although trees are to be felled here too to provide works and vehicular access to the rest of the site.

## **SAVE SOUTHWARK WOODS' OBJECTIONS to SOUTHWARK LBC'S PROPOSALS**

Save Southwark Woods was constituted in 2015 to protect and preserve the woods and graves of the Camberwell cemeteries.

Below are SSW's main objections to Southwark LBC's applications for faculties – more detail will be provided at preliminary and full hearing. We will also be calling a number of expert witnesses to support our objections at the hearing.

### **1. LOSSES OF BENEFITS OF THE WOODS AND GRAVES OF AREA Z AS A RESULT OF SOUTHWARK LBC'S PROPOSALS**

#### **LOSS OF ACCESS TO WILDER NATURE**

- Southwark LBC is rapidly densifying. Managed parks and gardens are good but provide a very different quality of space and encounter with nature, than wilder areas which tend to provide greater biodiversity.
- Area Z to be developed is a wild natural space with a wide range of habitats and species, of value to people and nature.
- Access to wild nature is recognised as a benefit to people of all ages, for education, emotional and spiritual development, to encounter nature in a wilder rather than managed or more manicured form.
- Only a very few places left in the British Isles are truly wild now. As a result, even places like Area Z in London which have been used for a variety of uses, but then left to go wild and not 'tidied up' are becoming more and more scarce, especially under pressure from development.
- Habitats such as woodland undergrowth and scrub, even maturing secondary woodland, provide some of the most ecologically rich habitats.
- Southwark LBC's proposals are to fell hundreds of trees and clear all undergrowth and vegetation to ground level. The 'replacement' planting of up to 60 trees offered by Southwark LBC cannot make up for this extensive loss of hundreds of trees which at Southwark LBC's Overview and Scrutiny Committee Tree Officer stated were 'too many to count'.

#### **LOSS OF TREES, ECOSYSTEM SERVICES AND ASSET VALUE**

- Hundreds of trees are to be felled, including silver birch, hazel, ash, a wild pear, and a wide range of other native broadleaf woodland trees, secondary woodland growth, as well as at least 18 more mature trees over 30-50 years old planned to be felled by Southwark LBC.
- The value of trees and woods to human benefit is becoming widely recognised. Ecosystem services provided by woods can now be measured in both social amenity, health and financial value to a Local Authority, through assessment methods such as a CAVAT (Capital Asset Value of Amenity Trees) survey or iTree-Eco assessment.

- The Mayor of London's office recently commissioned the Forestry Commission to carry out an iTree-co survey to value London's trees and woods – which included the Camberwell Cemeteries.
- The value of London's urban forest is approximately £6.1Bn.
- Using the basic iTree Eco assessment method, SSW has estimated the woods and trees of Area Z to be worth approx. £1.5M every year to Southwark LBC in ecosystem services such as improving air quality, storing storm water and cooling the neighbourhood in hot summers. That value is not a one off value but is provided for free every year.
- This has not been factored into Southwark LBC's proposals.
- A full iTree-Eco survey or CAVAT assessment of the site would be able to more exactly represent its full value and therefore losses to be incurred when felling hundreds of trees. SSW objects to this loss of free benefits currently provided by the trees and woods.
- This has not as far as SSW can see been included anywhere in Southwark LBC's assessment or cost benefit analysis of the project.
- SSW believes that the proposals will result in a large net loss of asset value and ecosystem services benefits from the trees and woods.

#### **LOSS OF AIR QUALITY**

- Southwark LBC is one of the most polluted boroughs in London, and more than 200 people die early from air pollution related diseases.
- Area Z sits in an Air Quality Management Area.
- Area Z contributes to better air quality as a result of the hundreds of trees on site. Replacement with fewer than a third of these cannot replace the loss to air quality provision.
- Soil around trees and woodland also contributes to good air quality and the excavation of the site and 12,000 tonnes of soil and rubble will also mean a loss in this area.

#### **LOSS OF STORM WATER MANAGEMENT AND FLOOD PREVENTION**

- Camberwell Old Cemetery regularly experiences surface water flooding and waterlogging of both old and new graves
- The benefits to be lost by felling hundreds of trees could only be calculated by accurately assessing the contribution of the full number of trees to storm water management on site.
- Southwark LBC has only carried out a desk-based Tier 1 assessment of surface water drainage and the potential reduction of the capacity of the site to absorb and manage storm water.
- Trees can absorb on average 50 gallons of water a day, depending on their species, age and size. A full assessment of the potential loss is required and in SSW's opinion has not been carried out in sufficient depth.
- Constituent MP Harriet Harman wrote on 3<sup>rd</sup> February to Southwark LBC advising tree felling work to stop and an independent surface water drainage engineer's report to be commissioned.

- SSW believes that felling hundreds of trees on site with a thick layer of water impermeable London clay just below the surface and on a slope running down from the Sydenham-West Norwood Ridge may well have a negative impact on flood risk and reduce flood prevention to neighbouring properties and streets and that this requires independent assessment.

### **LOSS OF ECOLOGICAL QUALITY**

- Area Z is 2.5 acres within a Site of Borough Importance for Nature Conservation (SINC) Grade 1. The designation as a SINC is in part because of its location but also because of the ecology of the site, which includes the woods, meadows, thickets, glades and rides of the approx. 12 acres of woods in the cemetery, as well as the more managed open park type cemetery areas.
- Area Z has recognised bat colonies and at least two trees with a high likelihood of bat roosts
- Area Z is also home to protected species such as stag beetles and wild onion plant
- Since the felling began on 1<sup>st</sup> February, SSW believes that much of the habitat we have been calling to protect has been seriously damaged.
- SSW believes that these habitats are of great value to the area, both to nature and to residents and would be lost through Southwark LBC's plans.
- Southwark LBC proposes replacement with bat boxes and replanting of fewer than one third of the trees felled, to be pepper potted around the site. This can in no way make up for the loss of established mature woodland and a large area of secondary woodland, thickets, meadows, glades and other habitats.
- Both Ecological consultant Catherine Bickmore, Bat Consultant Huma Pearce and the London Wildlife Trust recognise the particular ecological quality of the site.
- This is to be replaced with newly terraced soil and lawned grave areas, which SSW believes cannot improve the existing wilder habitats.

### **LOSS OF HEALTH BENEFITS – MENTAL, PHYSICAL, EMOTIONAL, SPIRITUAL**

- SSW has been contacted by many people expressing their desire to retain Area Z as a wilder place for its character as a beautiful, special and spiritual place.
- Southwark LBC has variously described Area Z as 'scrub' (as though that were a negative word of low value – scrub is in fact one of the highest ecological value habitats in London) and 'not beautiful'
- Of course beauty is subjective, but the weight of opinion from local residents is that Area Z has value, mentally, physical, emotionally and spiritually.
- Southwark LBC's proposals would turn this wilder area into a managed and manicured cemetery with hundreds of private graves in rows in a lawned and comparatively sterile landscape.
- The opportunity to reflect on life and death in wilder more natural areas contributes significantly to human wellbeing and this is now widely recognised – especially in dense urban places.

- This is another loss that we see at Area Z as a result of Southwark LBC's proposals to clear and relandscape the site.

### **LOSS OF RESPECT FOR GRAVES AND REMAINS OF THE DEAD**

- As stated, Area Z includes the graves of 48,000 people's graves, called public or paupers' graves, as well as six areas of Commonwealth War Graves and 30 or more private graves.
- Southwark LBC's proposals take no account of these as sacred places for those resting there.
- At the time of burial, for many too poor to pay for a headstone or marker, rest in peace was the only promise made to them.
- LBC proposes to mound over the site of the resting place of these London poor with 740 private graves. SSW believes this is disrespectful to the graves and families and the history of those buried there, including those laid to rest in six Commonwealth war Grave areas.
- SSW would like to see these graves recognised for their social history and importance as a reminder of life and death at a particular time in London's history, marked and treated respectfully with the benefit of nature providing a context for this quiet and spiritual contemplation of the site and those buried here.

### **LOSS OF SOCIAL AMENITY**

- Area Z sits on the South London Green Chain Walk.
- In order to be accepted as part of the South London Green Chain Walk (SLGCW) Southwark LBC had to argue for the value of Camberwell Old and New Cemeteries for environment and social amenity.
- SSW supports that environmental and social amenity argument and believes it should be upheld by Southwark LBC, rather than developing what has become a biodiverse and rich habitat woodland.
- Amenity offered by Area Z before the illegal dumping included walking in nature, contemplation and reflection, wilder nature study and many other uses.
- This amenity will be lost through Southwark LBC's proposals as a manicured working cemetery landscape cannot provide these qualities to the extent they have been provided to date. This is another loss from the scheme.

### **FINANCIAL LOSS**

- Southwark LBC has given figures from 2011 of £1.24M capital costs to be written off on developing Area Z.
- These capital costs are to be spent on contracts with consultants, ground works, tree felling, road constructor and other companies.

- This is an unnecessary expenditure, given that burial is available immediately at Kemnal Park for a fraction of the price.
- 740 burial plots are to be provided for that £1.24M, resulting in a cost price of £1,675 per burial plot – more than three times the average cost of supplying burial space.
- For £1M, Southwark LBC could purchase burial land for all faiths at Kemnal Park, resulting in 800 burial plots, 1,600 interments for burial for residents of all faiths which current proposals do not provide.
- These plots could be given away free and still be better value than Southwark's current financial plan.
- This could provide 8+ year of burial provision.
- If leases were not given away free but sold, then revenue from lease sales could be reinvested into further burial space and so on.
- Southwark LBC could afford to put on a twice weekly bus service to Kemnal Park and still save money.
- The loss here is financial loss of public money, lack of sufficient cost benefit analysis with alternatives, and loss of the opportunity to be able to provide burial for all faiths to residents of Southwark.

## **2. GAINS**

- 740 private burial plots.
- A pedestrian gate entrance on Underhill Road: SSW supports as we believe this will allow more people to access the woods and understand the potential losses to come at Area J, K, L, H1 and H2, also currently beautiful woods, thickets, meadows, glades and rides of spiritual, mental, emotional and physical benefit to people.

## **3. SUPPORT FOR SSW'S CALL TO PRESERVE AND PROTECT THE WOODS AND GRAVES OF THE CAMBERWELL CEMETERIES**

- More than 10,000 people have signed SSW's petition to protect and preserve the woods and graves, the nature and history of the Camberwell cemeteries.
- Of these, more than 3,500 are from Southwark LBC and more 5,000 from the Diocese of Southwark.
- Leading political, environmental and cultural figures support the campaign, including the ecologist and author Tony Juniper, Bianca Jagger, President of the Bianca Jagger Human Rights Foundation, and many others.
- All but one London Mayoral candidate have supported SSW's call, across the political spectrum.
- More than 1,500 individual objections were received by Southwark LBCs planning committee to planning applications. More than 800 individual objections were received by the Diocese of Southwark.

- Southwark BC's proposals are extremely unpopular, both in the Ward, across the Borough and further afield.

#### **4. EXPERT WITNESSES**

**SSW will be calling on a range of witnesses regarding Southwark LBC's proposals, including but not exclusively:**

**Anne Stanesby**

Local resident and member of Friends of Camberwell Old and New Cemeteries Group and Southwark Cemetery Stakeholder Group

**Ken Scarlett**

Arboriculturalist, Adverdant Ltd

**Kenton Rogers**

Treeconomics Ltd Innovations Centre University of Exeter

**Sustainable Drainage Engineer**

**Financial consultant and others**

#### **5. PHOTOS**

Please see attached photographs showing tree felling across Area Z Camberwell Old Cemetery between 23<sup>rd</sup> and 26<sup>th</sup> February 2016.