

SAVE SOUTHWARK WOODS' OBJECTIONS

TO LONDON BOROUGH OF SOUTHWARK'S FACULTY APPLICATION TO DEVELOP AREA D1 AT CAMBERWELL NEW CEMETERY

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

AREA D1 CAMBERWELL NEW CEMETERY

Area D1 at Camberwell New Cemetery is 0.5 acre of Metropolitan Open Land and a Site of Borough Importance for Nature Conservation Grade 2, on the South London Green Chain Walk in Honor Oak, London Borough of Southwark.

Area D1 is on the eastern slope of One Tree Hill, on the boundary to One Tree Hill Local Nature Reserve and is a steep 1:7 gradient which may not come across from photographs alone.

Its view is stunning of the City and London as a whole and this rare wooded hillside on One Tree Hill is the landmark characteristic of Honor Oak.

Southwark LBC's Woodland Management Plan and Conservation Management Plan for Camberwell Old Cemetery includes Area D1.

Area D1 has a mixture of native broadleaf woodland trees, including mature oaks, undergrowth and a range of habitats and species.

The Local Nature reserve has a rare colony of hedgehogs which roam widely to forage and are likely to be using Area D1 as part of their foraging habitat.

Area D1 is virgin land, not used for burial previously except for two unauthorised burials of cemetery related workers.

SOUTHWARK LBC PROPOSALS FOR AREA D1

Southwark LBC proposes to fell up to 60 trees across 0.5 acres of Camberwell New Cemetery, known as Area D1, on consecrated ground.

The land is to be remodelled with a new vehicle access road up the steep slope of this historic and rare virgin wooded hillside. The excessively steep slope of the site may explain why it has not been used previously for burial, as well as its valuable woods and trees bordering an LNR

The steep slope discriminates against pedestrian access by anyone with mobility issues including wheelchair users, something which Southwark LBC has agreed itself.

The development proposes 140 private burial plots, less than 8 months' burial provision.

A large area of the woodland along the north western perimeter of the site is to be removed and the glade widened to almost double its existing size.

Drainage and storm water overflow are to be managed by the existing site below.

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 TREES OF AREA D1 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 D1 to be developed is a wild natural space with a wide range of habitats and species, of value to people and nature.
- Area D1 is virgin ground with two 'unauthorised' burials of cemetery related workers.
- 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, places like Area D1 are rare in London. Virgin wooded hillside not previously developed is extremely rare in London and places like Area D1 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 up to 60 trees and clear all undergrowth and vegetation to widen the existing glade, almost doubling its size from 500 sq m to 950 sq m, removing much of its contiguous overhead canopy.
- The 'replacement' planting elsewhere in the New Cemetery offered by Southwark LBC cannot make up for this extensive loss of trees and a rare landscape character.

LOSS OF TREES, ECOSYSTEM SERVICES AND ASSET VALUE

- Up to 60 trees are proposed to be felled, including 8 oaks, silver birch, hazel, ash and other native broadleaf woodland trees, as well as a non-native Holm Oak 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 woods and trees of both Camberwell Old and New 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 D1 to be worth approx. £250,000 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 the trees proposed. SSW objects to this loss of free benefits currently provided by the trees and woods.
- This assessment of asset value 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 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. More than 10,000 across the capital.
- Area D1 sits in an Air Quality Management Area.
- Area D1 contributes to better air quality as a result of the hundreds of trees on site. Replacement with fewer than those to be felled cannot replace the loss to air quality provision.
- Soil around trees and woodland also contributes to good air quality and the excavation, road construction and re-landscaping of the site will also mean a loss in this area.

LOSS OF STORM WATER MANAGEMENT AND FLOOD PREVENTION

- Camberwell New Cemetery regularly experiences surface water flooding and waterlogging of graves.
- The benefits to be lost by felling as many as 60 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 3rd February to Southwark LBC advising tree felling work at Area Z to stop and an independent surface water drainage engineer's report to be commissioned. SSW believes this work also needs to be applied to Area D1.
- SSW believes that felling as many as 60 trees on site with a thick layer of water impermeable London clay just below the surface and on a steep 1:7 gradient slope running down from the top of One Tree Hill may well have a negative impact on flood risk and reduce flood prevention to neighbouring properties and streets below and that this requires independent assessment.

LOSS OF ECOLOGICAL QUALITY

- Area D1 is 0.5 acres within a Site of Borough Importance for Nature Conservation (SINC) Grade 2. 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, trees and beautiful secluded glade high on One Tree Hill facing north to the City.
- One Tree Hill Nature Reserve has recognised bat roosts and Area D1 has high potential also, with several species of bat witnessed there in recent years.
- 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 trees than those felled, elsewhere at the Cemetery. This can in no way make up for the loss of established woodland, meadows and glades especially providing as they do a buffer for the Local Nature Reserve.
- Both Ecological consultant Catherine Bickmore, Bat Consultant Huma Pearce and the London Wildlife Trust recognise the particular ecological quality of the site.
- SSW believes this cannot be replaced with newly terraced soil and lawned grave areas, nor 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 D1 as a wilder place for its character as a beautiful, special and spiritual place for contemplation and reflection.
- Of course beauty is subjective, but the weight of opinion from local residents is that Area D1 has value, mentally, physical, emotionally and spiritually.

- Southwark LBC's proposals would turn this virgin wooded hillside into a managed and manicured cemetery on a very steep slope with 140 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 D1 as a result of Southwark LBC's proposals to clear and relandscape the site.

LOSS OF RESPECT FOR GRAVES AND REMAINS OF THE DEAD

- Although much of D1 is virgin wooded glade and woods, there is also an area of public graves to one side, including people who died in the Blitz during World War 2.
- 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 private graves. SSW believes this is disrespectful to the graves and families and the history of those buried there.
- SSW would like to see these graves protected, preserved and 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 D1 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 virgin wooded hillside.
- Amenity offered by Area D1 includes 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

- Capital costs to be spent on Area D1 on contracts with consultants, ground works, tree felling, road constructor and other companies are to be written off.
- This is an unnecessary expenditure, given that burial is available immediately at Kemnal Park for a fraction of the price.
- These plots could be given away free and still be better value than Southwark's current financial plan.
- If leases from Kemnal Park were not given away free but sold, then revenue from lease sales could be reinvested into further burial space and so on.
- Southwark LBC claims that travel would be prohibitively expensive for residents yet Tower Hamlets Council 12 miles away recently invested £3M in 3 acres of land at Kemnal Park Cemetery.
- 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

- 140 private burial plots.

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