

**Camberwell New Cemetery Area D1
Planning Application Submission
Design and Appearance and Access Statement**



July 2015

This report forms part of the pre-application planning submission for a proposed scheme to prepare an area of land within Camberwell New Cemetery to be more suitable for burial comprising tree felling, localized ground modeling and surface water drainage, laying out of access paths, and associated seeding, turfing, planting and nature conservation measures. It is prepared on behalf of Southwark Council by Harrison Design Development Ltd.

DOCUMENT INFORMATION AND CONTROL SHEET

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Application drawings and illustrative drawings submitted with this application are as detailed at Annex 1.1

Supporting Documentation:

Supporting documentation and background reports submitted with this application are as detailed at Annex 1.1

1.0 INTRODUCTION

- 1.1 This submission concerns a scheme for the laying out of access paths, burial areas, minor re-grading, planting and nature conservation measures over an existing area of ground within Camberwell New Cemetery.
- 1.2 This submission explains the value of the site, the context of the proposals as part of the wider Southwark Cemetery Strategy, and the constraints and other considerations that have influenced proposals to develop the site, and describes the components of the development and the preferred layout and the findings of assessments made against various planning considerations. This document includes a Design and Appearance and Access Statement.
- 1.3 Pre application discussions have been held with planning officers on the 15 April 2015 and a pre application submission was made in June 2015. Through this process issues have been raised, discussed, and where relevant, proposals further developed and / or additional information provided. A number of meetings have been held with the Southwark Diocese including with Mr Andrew Lane on 17 March 2015, and a Faculty Application has been made. This is currently being considered.

2.0 DESCRIPTION OF THE SITE

2.1 Site, Location, Context

2.1.1 The site is located within the north west corner of Camberwell New Cemetery, adjacent to One Tree Hill. The site is centered on grid reference TQ 36505 74300. The area of the site is referred to as Area D1, taken from the Southwark Cemetery Strategy.

Site- General

2.1.2 The site lies on the rising slopes in the western-most part of the Cemetery. It is bounded to the immediate east by an area of private burial with headstones and kerbsets whilst areas of public burial lie to the north and south. To the west is One Tree Hill Allotments, whilst One Tree Hill Nature Reserve lies to the north west .

2.1.3 Most of the area is currently an area of woodland with a glade in which two existing graves are situated. Excepting for these two graves the woodland edge and glade area has not previously been used for burial. The site also takes in an area of public burials to the south of the glade which currently has some small tablet memorials. The site which is the subject of this application extends to around 2200 sq.m

2.1.4 It is proposed to widen this glade to create additional burial space and to provide a narrow access path up the slope across the public burial area. Planning permission is required expressly in relation to the path and minor associated re-grading work.

2.2 Consecration and Burial History

2.2.1 The land was originally purchased for the purpose of providing burial space at Camberwell New Cemetery, and extended over a much greater area than at present, including the Honor Oak recreation ground, One Tree Hill allotment areas, and the Old Nursery area. However within the current cemetery boundary the only significant area not fully used for burial is the woodland and glade area at D1.

2.2.2 D1 lies within Sections 112 and 120 of the Cemetery and these sections, along with the whole of the north-western portion of the Cemetery, is Consecrated as burial

ground. Any significant work will therefore require Faculty and consultation with the Southwark Diocese is ongoing.

- 2.2.3 Graves used for public burials sometimes had small ‘tablet’ memorials. These simple stone tablets were usually placed at the discretion of the cemetery superintendent, and no rights (neither exclusive rights of burial nor memorial rights) were granted to the families of those buried in public areas. Whilst across the cemetery most of the tablets have since been removed, as is common practice in public cemeteries. A number of these small tablets remain in the public burial area south of the site.
- 2.2.4 Areas of private burials extend immediately to the east (and outside) of the boundary of the site and these have full kerbsets. Alternative alignments for an access path through these private graves have been investigated but it has not proven possible to achieve a more direct route on account of the number of graves that are ‘younger’ than 75 years old.

2.3 Topography

- 2.3.1 The site occupies the most elevated part of the Cemetery. It lies on rounded shoulder of land with slopes falling away to the east and south and north. At their maximum steepness these are at 1 in 5 gradient, very slightly steeper than the adjacent burial areas. The ground continues to rise through One Tree Hill allotments to the west and up to the nature reserve to the immediate north-west of the site.
- 2.3.2 The underlying ground is predominantly clay and a preliminary slope stability assessment has been carried out to determine whether further burial on the slopes would present any hazard. That assessment finds the ground would be stable further to burial.

2.4 Nature Conservation

2.4.1 The cemetery is a Site of Borough Importance (Grade II) for nature conservation. A number of ecological surveys have been (or are in the process of being) carried out including:

- *Camberwell New Cemetery Southwark: Ecological Assessment (Catherine Bickmore Associates October 2011)*
- *Bat Emergence Survey of Area D1 at Camberwell New Cemetery, Brenchley Gardens, LB Southwark, London (ASW July 2013)*
- *Camberwell New Cemetery Area D1-Preliminary Bats Survey Report (London Wildlife Trust-May 2015)*

Catherine Bickmore Ecological Assessment-2011

2.4.2 The Cemetery was the subject of a nature conservation assessment (carried out by Catherine Bickmore Associates in July 2011).

2.4.3 The majority of the cemetery site (as a whole) consists of amenity grassland and species-poor semi-improved grassland between graves with the large amenity grassland/sports ground (Honor Oak Park) set adjacent. These habitats are noted as being of little conservation interest. Scattered trees, hedgerows and scrub belts around the Cemetery are noted as providing local conservation interest and potential for birds.

2.4.4 The assessment finds that the cemetery as a whole consisted of common and widespread habitats which are easy to re-establish and that the importance of the SINC lies mainly on account of its extent and location in an otherwise built-up area.

Habitats include:

- Amenity grassland.
- Species poor semi-improved grassland.
- Tall ruderal.
- Dense scrub.
- Scattered scrub.
- Introduced scrub (ornamental planting areas).
- Broad leaved semi mature woodland.
- Scattered trees.

- Species poor hedgerow.

2.4.5 The wooded area (Area D and D1) in the south western part of the site forms the edge of the woodland on the adjacent One Tree Hill Site of Borough Importance (Grade II), and is likely to support breeding birds and possibly roosting and foraging bats, hedgehog, stag beetle and sheltering amphibians/reptiles and therefore provides local nature conservation interest to the site. However the understorey is noted as being dominated by bramble and ivy and is species poor. The Phase 1 plan identifies:

- the woodland as being semi mature broadleaved woodland
- the glade as being amenity grassland
- the area of public burials to the south as being species poor semi improved grassland.

2.4.6 Recommendations in respect of the D1 area are made as follows:

5.15 The western and southern parts of Area D were more densely wooded, forming the edge of the secondary woodland in One Tree Hill Site of Nature Conservation Importance and acting as a buffer to this site. Tree roots may restrict burial in this area and parts of this area were fairly steep which may also limit use for burial. However, the understorey flora of the woodland was dominated by bramble and ivy and was fairly species poor, therefore the area offers some potential for further burial. Existing glades penetrating the south eastern edge of the wood could be widened and new glades created in flatter areas to create space for burial while retaining the wooded feel and nature conservation interest of the area and retaining a wooded buffer to One Tree Hill.

5.16 The hedgerows and lines of scrub and trees surrounding the peripheries of the site should be retained as far as possible to maintain habitat connectivity around the edge of the cemetery and provide enclosure from adjacent roads.

5.17 In area D, the wooded area immediately adjacent to One Tree Hill should be retained as a woodland habitat buffer connecting to the site of nature conservation interest. The patches of scrub including elm and dead wood (particularly the cherry tree stump) should be retained where possible, subject to

health and safety, to provide habitat for invertebrates and nesting birds and provide some enclosure to areas of burial adjacent to the woodland. Mature trees should be retained where possible to maintain the wooded feel of the area and enhance biodiversity.

5.18 Depending on the results of the reptile survey, mitigation measures may need to be employed before any major excavations are carried out in Areas C, D or E (see 'General Mitigation Procedures').

2.4.7 General Mitigation Procedures are given in the report to include:

- removal of trees and scrub outside of bird nesting season;
- carrying out of reptile surveys;
- retain deadwood insitu;
- retain oak trees as flagship species;
- cutting of grassland edges to woodland and scrub patches 1-2 times per year;
- should be allowed to flower in summer/autumn before cutting;
- hedgerows/scrub should be cut in early spring to provide fruit for birds overwinter;
- provision of fruiting scrub and hedgerows to encourage small birds;
- allowing strips of longer grassland to develop adjacent to hedges and scrub belts at the western and northern edge of the site, enabling colonisation by ground flora such as bird's-foot trefoil, dog violet, meadow vetchling and buttercup;
- cutting of grassland no more than twice per year in spring and late autumn to allow flowering.

2.4.8 Measures are given specifically in relation to Area D1

- *'to improve the nature conservation value of Area D, the structure and biodiversity of the woodland edge could be improved through planting native scrub such as hawthorn, hazel and holly. This would also act as a buffer habitat to the woodland, and the area would be further enhanced through less intensive maintenance of scrub and grassland at the woodland edge'.*

London Wildlife Trust-Bat Survey

2.4.9 A preliminary Bat survey report has been undertaken by London Wildlife Trust (May 2015). The survey is intended to supersede the earlier 2013 survey. The report is included with the application. The bat report also included commentary on the wider ecological aspects of the site and the proposals.

2.5 Arboriculture

2.5.1 Trees in Area D1 and the adjacent parts of the cemetery were surveyed within a topographic survey, recording species, girth and canopy size. Further to which an Arboricultural survey was carried out in 2011 accordance with BS5837 and reviewed in 2013 and again in 2015. A full schedule is included with the application. Existing trees (along with proposals for retention, felling and tree protection fencing) are shown at drawing 048-05-51.

2.5.2 The survey finds that within or directly adjacent to the site the Area D1 site area there are standard trees including :

- Numerous category B (moderate quality) English Oak,
- One category B (moderate quality) Lombardy poplar,

2.5.3 At the edge of the glade on the south and west sides respectively are tree groups TG561, TG562 , TG563 including numerous single/multi-stem sycamore and oak trees. These form the edge of wider area of woodland shrub.

2.5.4 Neither the trees, nor the woodland as a whole, are the subject of a Tree Preservation Order.

2.6 Hydrogeology

2.6.1 A Tier 1 risk assessment has been undertaken by Smith Grant Partnership (SGP) to appraise the suitability of the site to receive new burials by assessing the potential risks posed to groundwater and surface waters.

2.6.2 The assessment has been undertaken in accordance with relevant EA Guidance (*Environment Agency; Assessing the Groundwater Pollution Potential of Cemetery Developments, April 2004* , *Environment Agency; Pollution Control of Cemeteries*’,

R&D Technical Report P223 (issued 2002, revised 2005), Environment Agency; Science Report 'Potential Groundwater Pollution from Cemeteries' (December 2004), EA Groundwater Protection: Principles and Practice (GP3), August 2013, version 1.1, Part 2, Section 6, L: Cemetery Developments). The EA guidance requires demonstration that the use of land as a cemetery will not result in any noticeable impacts on the groundwater from List I substances and ideally none from List II substances.

2.6.3 Reference has also been made to EA policy documentation which details the EA specific policies with regards to cemetery developments. The report concludes (at para 4.1 to 4.4) that the proposed area of land is suitable for use for future burials with regard to potential risks to groundwater, and that no further assessment is necessary.

- 4.1 *Given the location of the proposed development area within a Zone II of a groundwater source protection zone a Stage 1 Risk Assessment has been undertaken of the proposed development in accordance with the EA guidance, Pollution Potential of Cemeteries, R&D technical Report P223'. The assessment has identified the site as having a groundwater vulnerability rating of 'very low to low'. As the predicted number of annual burials within the new cemetery is below 100 the site would fall into a 'proposal with moderate risk' (reference to Figure 5.2 of P223).*
- 4.2. *However, the site only forms a very small area compared to the existing cemetery which has been in use since the early 1900s and currently houses in the order of 20,000 burials. Both the site, and existing cemetery, lie within Zone II of the source protection zone associated with the Honor Oak drinking water abstraction. The abstraction is taken from the principal aquifer within the deeper Upper Chalk. The site, and adjoining existing cemetery and surrounding area, is however underlain by a substantial layer of London Clay. This is an Unproductive Strata and provides significant protection across the London Basin to the underlying secondary aquifers within the Woolwich and Reading Beds and Thanet Sands and the principal aquifer within the Upper Chalk.*
- 4.3. *Although groundwater may be present within pockets of sand and fissures within the clays of the London Clay this is unlikely to form a continuous water table or be in connection with the deeper groundwater aquifers. The site effectively forms a small part of the existing large cemetery that has been in use since the mid 1900s with no known environmental problems.*
- 4.4. *The site does not lie in an area that meets any of the criteria where the EA may object to an application for a cemetery development.*

- 4.5. *Given the presence of the extensive London Clay, and the ratio of the size of the development to the existing cemetery, the site is not considered to pose a risk to the groundwater. It is not considered that any further investigation or assessment is required with regards to potential risks to groundwater that may be posed by the site.*

2.7 Archaeology

- 2.7.1 Research of historic mapping carried out as part of the Cemetery Strategy and Conservation Management Plan process reveals that this area was open fields prior to 1900s. From 1900 OS mapping shows One Tree Hill adjacent as being planted as a Recreation Ground. The current cemetery, allotments, and Honor Oak Recreation Ground at that time were a golf course. From 1927 the area was laid out as cemetery as recorded on consecration maps of 1940's. As noted above, burial records show that the main part of the site was undisturbed by burial but the south part of the site (where the path is proposed) was used an area of public burial into the late part of the C20th. No private tombs/vaults are present in the main part of the site.
- 2.7.2 It is therefore anticipated that no archaeological interest is present within the site.

2.8 Open Space and Amenity

- 2.8.1 Camberwell New Cemetery is managed, alongside Nunhead and Camberwell Old Cemetery by the Southwark Council Public Realm (Parks and Open Spaces) section. The cemeteries are addressed within the Southwark Open Space Strategy.

Southwark Open Space Strategy 2013:

- 2.8.2 The Open Space Strategy is the result of several years' work beginning with the preparation of an Open Space Strategy (2003) and continued with the publication of the Open Space Strategy Evidence Report in 2010 and subsequently was the subject of further development and consultation through to its publication in 2013. The need for an open space strategy is set out in national and regional government guidance, including the National Planning Policy Framework (NPPF), and the London Plan. Cemeteries are recognised open space of public value and are therefore addressed within the Strategy.

2.8.3 The Vision set out within the Southwark Open Space Strategy is
“To encourage a diverse network of sustainable open spaces of high quality which meets the needs of those living and working within the borough and encourages the development of more inclusive communities, safeguards natural resources and cultural heritage, improves access to natural greenspace, provides recreational and educational opportunities and helps to promote sustainable development.”

2.8.4 Reference to Cemetery Strategy is made within the Open Space Strategy at page 12 and again at para A.1.138 page 171 within evidence base:

Cemetery Strategy

The Cemetery strategy establishes our commitment to preserve cemetery land for use as burial grounds. Cemeteries are recognised as appropriate use of Borough Open Land and Metropolitan Open Land and are a valued resource of open space in the borough. The strategy addresses the shortfall of burial space in the borough’s cemeteries and sets out a detailed action plan to ensure the continuity of burial provision within Southwark until 2035. In making provision for burials the Council places a priority on the use of any currently unused land within its existing cemeteries”.

Access

2.8.5 The area is currently open to public access during cemetery opening hours. The site is relatively steeply sloping and has no formal access path, however the public are able to walk up through the site on a narrow, steep, unsurfaced informal path along the boundary with the allotments, as well as up through the grassy glade past the existing burials. Access can be obtained to the bottom of the site on the existing cemetery footpaths and carriageways which at their steepest are at around 1 in 6.5 and tarmacadam surfaced.

2.8.6 Views are available from the top of the slope east across the cemetery toward Canary Wharf business district and, whilst tall poplars partly intervene in that view, it is acknowledged as a distinctive view.

3.0 THE PROPOSAL

3.1 Need

Burial

- 3.1.1 Southwark's Bereavement Service provides for burial and cremation within the borough. However, as is the case with other London Boroughs, supply of burial space is becoming critical.
- 3.1.2 To address this shortage of burial space, Southwark Council has developed a Cemetery Strategy, adopted in June 2012. The Strategy focusses on options for burial within the current cemetery areas within Southwark, but also takes account of potential options for burial outside of those areas. The Strategy was informed by earlier studies commissioned by Southwark and also by the Audit of London Burial Provision (commissioned by the Greater London Authority and undertaken by the Cemetery Research Group, University of York in March 2011).
- 3.1.3 In April 2011 a number of immediate and short term options to provide burial space were highlighted in a report to Southwark Council cabinet. The cabinet approved that these options should be pursued. Over the Summer of 2011 a programme of public consultation was carried out seeking views on future burial provision in the Borough. That consultation informed the development of the Cemetery Strategy.
- 3.1.4 The burial strategy consists of three principle stages: Short Term, Medium Term, and Long Term.
- 3.1.5 Short term options within the Strategy (which includes immediate options) seek to address the immediate shortage of burial space up to 2022, some of which have been progressed. Implemented areas of the short term measures comprise the continued extension of burial areas at Camberwell New Cemetery, at the Old Nursery Site (Area A – now completed and in use), a small pocket of virgin land within Camberwell Old cemetery (Area E – now completed and full), and soil top up above an area of historic public graves within Camberwell Old cemetery (Area F/F1 – now completed and in use).

- 3.1.6 At the present time burial space within Southwark will run out sometime in early to mid-2017 if the Council takes no further action. As such Southwark Council now seek to progress the other short term options including Area D1 in Camberwell New Cemetery, which is the subject of this application, as well as Area Z in Camberwell Old Cemetery.
- 3.1.7 Southwark is home to many communities for whom burial is the only acceptable option. The Council is obligated to respect their religious and cultural beliefs and continue to make burial an option for these communities. A significant minority of people, for whom cremation is not an option, will continue to need to be buried. The adopted Southwark Cemetery Strategy seeks to deliver a sustainable future for burial in the borough, including re-use, in accordance with London Plan policy 7.23. This aims to meet burial needs locally, in turn minimising the requirement for bereaved friends and relatives to travel significant distances to new burial space that would potentially be sited on greenfield land outside of the borough, or indeed outside of London.
- 3.1.8 This proposal, for operational development to prepare part of the existing cemetery site for burial, thus seeks to make an important contribution to the supply of burial space. It would provide in the order of 6 to 8 months (equivalent) years supply, albeit would be offered at the same time as other options (principally Area Z) and is considered as an integral part of the wider long term strategy. In doing so it aims to provide a supply of burial space for the people of Southwark in close proximity to the people who need it.

3.2 The Proposal

Scope and Extent

- 3.2.1 This application seeks to route a footpath to allow better access to this part of the cemetery. The existing grassy glade would be marginally widened out either side of the existing graves by clearing bramble understorey and through very limited felling. This would allow burial within a widened woodland glade, enveloped by the existing retained woodland.
- 3.2.2 The total area of the site, which includes the area required to implement the footpath and the burial area is 2200 sq.m.

Felling and clearance

- 3.2.3 The existing grassy glade is a little over 400sq.m and the proposal extends it by extending burial into the woodland edge by an additional 550sq.m.
- 3.2.4 One significant tree, Poplar T0515 would be lost in order to route the path in at the bottom of the slope. 23 young/semi mature/early mature trees at the woodland edge within tree groups TG561, TG562 and TG 563 would also be removed. These would include young or suppressed sycamore, and prunus and a number of the smaller oak. A number of trees in poor condition would also need to be removed. Some trees including a young holm oak are considered candidates for translocation

Access

- 3.2.5 A narrow access path would make its way up the slope from the existing tarmacam carriageway at gradients of between 1 in 8 and 1 in 7. A small seating area with communal memorial bench would be sited overlooking the area of public burials in the south. A second seating area would be situated to benefit from views in the north.
- 3.2.6 The path would be tarmacam surface but finished in bound -chipping dressing.

Burial Area

- 3.2.7 Setting out of the burial area would involve minor localised re-grading. Surface water would be guided away from the burial area by narrow gravel strips. Burial would take place between those strips and between 140 and 150 double depth plots could be achieved depending on precise setting out.

Adjacent Nature Conservation Interests

- 3.2.8 The site does not extend to the boundary of the One Tree Hill allotments adjacent nor to the One Tree Hill SINC. Instead there is a buffer of some 6m (at its narrowest point) between the burials and the allotments and some 25m distance between the burials and the Nature Reserve). The substantive areas of existing woodland north and south of the glade are similarly retained and protected. The majority of the public burial area to the south of the site are not directly affected by the proposals.

3.2.9 Nature conservation mitigation measures within the adjacent woodland areas are however proposed as set out below.

Construction Phase Environmental Management Plan

3.2.10 The works proposed in this submission would be the subject of a detailed Construction Phase Environmental Management Plan (CEMP). The CEMP would address

- Enabling, Site Establishment, (contractor to work strictly within confines of site boundaries)
- Hours of Work
- Tree Protection
- Ecology and Nature Conservation
- Traffic Management and Deliveries
- Dust Control and Mud on Road
- Site Waste Management Plan
- Control of Noise
- Use of the Highway and Parking
- Health and Safety and Public Safety
- Control of Hazardous Substances
- Protection of Graves and Memorials

3.2.11 Critically, the contractor will be strictly limited to the tightly defined working area and made fully aware of all obligations in terms of protection of nesting birds, bats, and all trees and woodland to be retained. Key requirements and restrictions will be as set out within the CEMP.

Arboriculture

3.2.12 The site includes a number of poplar, oak, and sycamore and a number of smaller self-prunus and other trees. These are as recorded on the plans. Within the site the trees to be removed are identified on drawing 048-05-51. All other trees are to be retained and protected during the works.

3.2.13 No trees are to be felled until bat surveys have been undertaken by the clients ecologist (below). No felling is to take place in bird nesting season

- 3.2.14 The contractor is to undertake the works in a careful manner, during an appropriate time period and utilise sectional felling techniques as directed. All tree works are to be carried out by appropriately trained personnel and members of the Arboricultural Association 'ARB Approved Contractor' (ArbAC) scheme.

Implication of demolitions and foundations, underground and overground services

- 2.5.5 There are no known foundations or structures requiring demolition. There are no known underground or overground services connected with the proposals that could impact on trees. Surface water drainage is achieved generally by shallow drainage structures and attenuating soakaway features. Mostly this accommodated away from areas that would impact upon trees and, whilst drainage pipework is not likely to affect existing trees.

Implication of ground level changes

- 2.5.6 Where landform is raised over a proportion of the roots of any trees to be retained, special root protection measures are proposed including no dig construction pathways.

Implication of construction activity

- 3.2.15 Drawing 048-05-051 Tree Protection Plan (the TPP) shows how trees are to be protected during the works and shows Root Protection Areas and areas which are to be fenced off as Construction Exclusion Zones. Within all exclusion zones construction activities shall be strictly limited as detailed below.
- CEZ shall be defined using protective fencing to BS 5837 (2012) and as shown on drawing 048.07.34
 - Protective fencing must be erected immediately upon possession of the site and in advance of bringing onto site any other plant or materials;
 - Fencing shall remain in place and shall be maintained in good order for the duration of the works
 - There shall be no storage of material or plant connected with the works within any CEZ
 - No other site activities shall take place within the CEZ

3.2.16 In some cases a 2nd phase tree protection fence to 048-05-034 is shown . This is to be erected prior to clearance and earthworks and the contractor may remove it only as required to allow localised clearance /no-dig construction to the agreement of the PM and in order to complete works .

2.5.7 There is likely to be some requirement for pruning of existing trees to be retained before during and after the works in line with best practice and in order to ensure retained trees are properly protected and are afforded the best opportunity to develop well balanced forms . All such work would be carried out strictly in accordance with the observations and directions of the Councils arboricultural officer.

Retained Trees

2.5.8 As with most developments future tree growth may impede movements and access but this can be satisfactorily avoided by careful management, without further loss of trees. The locations of new trees has been carefully considered to similarly avoid long term issues.

Mitigation

2.5.9 By way of mitigation against tree losses in excess of 25 feathered, standard, and extra heavy standard trees ranging from 3.0m to in excess of 6.0m in height would be planted. Extensive areas of new native shrub/scrub would also be planted, designed to mitigate for the loss of existing of scrub habitat. The composition of these planted shrubs and the hedgerows will be designed to include a varied species range of native plants, following LWT recommendations.

Bats

3.2.17 The LWT bat survey reveals bat activity over the site and points to ivy clad trees in and around the site as having moderate potential for bat roosts. These are deemed therefore to include trees at the head of the woodland glade which would be proposed to be removed. In accordance with the LWT recommendations:

- vegetation clearance works would only be carried out between mid-September and the 1st November or during April to avoid the bat breeding and hibernation seasons.

- dusk and dawn surveys would be carried out of any trees where roost sites are confirmed or suspected prior to the commencement of works and if bats are found measures would be carried out strictly in accordance with a European Protected Species Licence.
- tree surgeons should be briefed on bats and their field signs, features that offer suitable bat habitat and the bat legislation prior to the commencement of works. All works would be carried out under licence .
- a Class 2 Licenced bat ecologist would be present during the felling works .
- trunks or stems would need to be sectioned and lowered to the ground, rather than clear felled.
- any cavity features would need to be removed intact by sectioning at least 500mm above and below the cavity, left on site in an upright position for at least 48 hours with the cavity unobstructed so that any bats can escape at dusk unharmed.

3.2.18 The contractor's facilities would be sited within the existing cemetery yard area and hard standing on the Old Nursery Site, with access directly off Honor Oak road via the existing access.

3.3 Design and Appearance Statement

3.3.1 The design aims to carefully protect and retain significant area of the woodland and involves the loss of less than 550sq.m woodland edge and only one substantial standard tree. To achieve this the scale of the proposals have been significantly reduced from 220 plots in the original Cemetery Strategy to the current number proposed (between 140 and 150 subject to setting out). Numerous design iterations have been worked through to achieve a sensitive integration of the burial into the woodland edge and to retain and protect an envelope of trees and woodland on three sides.

3.3.2 As a consequence of the sensitively arranged layout only 1 substantial tree and 23 smaller young, semi mature early mature or suppressed smaller trees are currently envisaged as being lost. All the substantial Category B Oaks within and adjacent to the site are retained, as are other mature trees adjacent in the woodland.

3.3.3 Wherever possible within the site, existing scrub and vegetation are retained. Tree protection proposals are set out at 048-05-51.

3.3.4 Thus the proposal seeks to achieve an area of burial within a woodland glade enveloped by floristically diverse woodland edge, the character of which would not be dissimilar to the existing glade.

Footpath and Surfacing

3.3.5 The footpath would enable pedestrians and funeral biers to gain access close to the burial area. A 1 in 7 maximum gradient is achieved over most of this footpath (the slackest slope achievable) which is consistent with other slopes in the western part of the cemetery. This footway would be between 1.5 and 2.0m wide, just wide enough to allow coffins to be wheeled (by bier) or carried to the graveside. The discrete flush edgings and tarmac base would be detailed to be robust, but the surfacing in bonded gravel chippings would have a low key informal appearance appropriate to the woodland setting. The bound chippings would also give a high friction surface being less slippery underfoot than tarmac.

3.3.6 There would only be very minor re-grading of levels, sufficient to enable the path edges to tie into adjacent ground levels, giving a natural appearance to the landform.

Seating and access

3.3.7 A small seating area with a memorial bench would be created at the top of the slope. This would allow the public and the bereaved to sit and to enjoy the view.

3.3.8 Similarly a small seating area would be created on the access path up through the public burial area. This would include a general inscription to commemorate those buried in public areas within the cemetery.

Burials and Memorials

3.3.9 Whilst not subject to ordinary planning controls, the memorials styles are proposed to be tightly controlled through the use of re-drafted memorial regulations in accordance

with the (draft) Conservation Management Plan and subject to agreement with the Diocese.

Nature Conservation Measures, Planting and Seeding

- 3.3.10 As far as practicable existing areas of groundcover and scrub that can be retained would be protected. Natural re-colonisation would also be promoted in selected areas. Nature conservation and outline planting seeding and turfing proposals are shown on drawing 048-07-43.
- 3.3.11 Around the burial area there would only be limited re-planting, predominantly of woodland edge ground cover and understorey species native to (and characteristic of) English oak woodland. This would be included only as and where necessary to stabilise and tie in disturbed areas of ground.
- 3.3.12 Seeding and turfing of the verges to the main burial area would include shade tolerant woodland grasses with a wildflower component. The aim would be to include graded marginal habitat with grasses, tall herbs, characteristic of woodland edge (early spring flowering).
- 3.3.13 The burial area itself (only where disturbed) would initially be turfed in a low growing, species rich turf (e.g. by the Wildflower Turf company).
- 3.3.14 The Council is considering the introduction of methods to increase the biodiversity of the grass sward within the burial areas in the mid-term and long term including measures such as over-seeding and introduction of wildflowers plugs.

Mitigation

- 3.3.15 It is the intention to continue to consult with stakeholders including the London Wildlife Trust in the detail development of the proposals to ensure nature conservation measures are developed to mitigate nature conservation impacts.
- 3.3.16 The London Wildlife Trust bat report included a number of recommendations (5.4.17)

In order to compensate for the loss of wildlife habitat within the Camberwell New Cemetery site, it is recommended that habitat enhancements are provided throughout the cemetery as a whole. This could include for example:

- *The widening of existing boundary treelines through the establishment of scrub vegetation and margins of tall herbs to create a graded vegetated feature;*
- *The planting of native tree and shrub vegetation at the boundary the Honor Oak Park Sports Ground (refer to Section 5.4.15 for species list) to create a linear vegetated feature that would enhance connectivity within the SINC;*
- *The enhancement of the existing grassland habitat throughout the cemetery by seeding with a wildflower mix (see 5.4.16) and reducing the cutting regime within some areas, to allow herb species to flower and seed, and habitat refuges for a variety of species;*
- *The creation of water features that would provide drinking water for birds and bats as well habitat for reptiles, common amphibians and invertebrates.*

- 3.3.17 Additional planting of native trees with a shrub understorey is proposed to the boundary along One Tree Hill allotments. This would include woodland understorey species as identified in the London Wildlife Trust report and including tree and shrub species . Shrubs would include hawthorn *Crataegus monogyna*, hazel *Corylus avellana*, dogwood *Cornus sanguinea*, field maple *Acer campestre* , alder buckthorn *Frangula alnus*, elder *Sambucus nigra*, wild plum *Prunus domestica*, guelder rose *Viburnum opulus*, box *Buxus sempervirens*, native privet *Ligustrum vulgare* and butcher's-broom *Ruscus aculeatus*. Tree species would include : Oak Hornbeam Sorbus Crab apple and English yew.
- 3.3.18 A mixture of sizes (feathers, standards, and transplants) would be used to bring about both early visual effect and good long term establishment rates. Woodland understorey shrubs characteristic of oak woodland would also be included. Disturbed ground within the planting would be allowed to regenerate.
- 3.3.19 The double line of poplars are noted in the arboricultural survey as being due for removal (and a number have already been removed on account of their condition)- the Council would continue to monitor their condition and take action appropriately .

- 3.3.20 The public burial areas, subject to the serving of appropriate notices, are to have the remaining tablets removed, and severe hollows and bumps would be levelled and made safe. Disturbed ground in this open area would be re-seeded with a wildflower mix including champions (*Silene sp*), pinks (*Dianthus sp*), and knapweeds (*Centaurea sp*) birds-foot-trefoil *Lotus corniculatus*, selfheal *Prunella vulgaris*, ladies bedstraw *Galium verum* and hawkbits *Leontodon spp.*
- 3.3.21 By way of a change to the existing management regime (of intensive strimming) wildflower areas would be managed to maximise floristic diversity. This would include cutting regime to allow for spring or summer flowering as appropriate.
- 3.3.22 Management proposals for these areas will be the subject of a detailed establishment maintenance and management plan that will continue to be the subject of further consideration and consultation, with stakeholders including the London Wildlife Trust.

Bats, Birds and other Fauna

- 3.3.23 In addition to the above bat and bird boxes would be erected as shown on Drawing 048-07-43. Surrogate trees would also be used for placement of any sectionally felled timber with cavities offering potential as bat roosts.
- 3.3.24 Other measures to enhance biodiversity would include the creation of hibernaculum (for amphibians and reptiles), retention of log piles and deadwood, using small amounts of felled timber retained on site. These are as shown on Drawing 048-07-43 will illustrative detail on 048-07-30.

3.3 Access Statement

Existing Situation

- 3.3.25 This part of the cemetery is accessed via the main gates on Brenchley Gardens and via the internal paths and carriageways. These are tarmacadam and on the approach to the western part of the cemetery are relatively steep (at gradients of up to 1 in 6 or 1 in 7).

- 3.3.26 Existing public access to the area is possible but difficult, passing between headstones and then up the grassy slope (maximum 1 in 5 gradient) or by means of narrow informal paths weaving through the woodland area at gradients. Those paths are in places steeper than 1 in 5.
- 3.3.27 Enabling appropriate access is a key consideration in the design of the scheme. It is also important to consider:
- the existing steepness of slope both on the site and on the approaches to the site,
 - the character of the cemetery and in particular the part wooded character of this part of the cemetery,
 - the need to balance access with nature conservation,
 - the practicalities of providing access to the burial areas for burial operations for funerals and for visitors.
- 3.3.28 With a view to achieve a balance between these considerations:
- the proposed footpath is as narrow as practicably possible whilst allowing access for visitors and coffin carrying/biers (1.5m to 2.0m),
 - the paths are surfaced in tarmac so as to be robust, but are surfaced in bound gravel to give an appropriate informal character and appearance,
 - the best (slackest) gradient that can be achieved for the path (without causing more disturbance of woodland areas) is 1 in 7- not dissimilar to gradients on the general approach. The gravel would be well bound so as to give a surface that is less slippery underfoot that would be the case for normal tarmac.

Access for All

- 3.3.29 Whilst gradients are the slackest practically and reasonably achievable given the inherent steepness of the site, the area will not be suitable for (unaided) access for all users. It would therefore be made available as part of a range of other options across the cemetery landholdings. The Cemetery and Crematorium Service has an electric vehicle available to facilitate better access, as close as is reasonably practicable to grave side for those with mobility difficulties.

3.4 Drainage

Drainage

- 3.4.1 No extensive scheme of drainage is proposed. The slope naturally sheds water north south and east and would continue to do so upon being used for burial. Very shallow filter drains along the line of the memorial plaques would direct surface water into the adjacent areas of woodland falling to the south and north to infiltrate, as is currently the case.

4.0 PLANNING POLICY

- 4.1 In developing this proposal consideration has been given to the
- National Planning Policy Framework (NPPF)
 - London Plan (March 2015)
 - The Southwark Plan (adopted 2007) (saved Policies) and
 - Southwark Core Strategy (2011)
 - Area Action Plans
- 4.2 Consideration is also given to The Southwark Open Space Strategy 2013.
- 4.3 The proposal is considered to be in accord with local and national policy.

5.0 CONSULTATION

- 5.1.1 Southwark Council have undertaken a range of engagements in relation various proposed developments across the cemeteries, and the proposal development has incorporated feedback where appropriate. These engagements are summarised at Annex 5.1

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ANNEXES

Annex 1.1 List of application drawings, illustrative drawings, supporting documentation

Annex 5.1 Summary of Consultations

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Annex 1.1

Annex 1.1 List of application drawings, illustrative drawings, supporting documentation

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Annex 5.1 Summary of Consultations

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SUMMARY OF CONSULTATIONS

5.1. BACKGROUND

5.1.1 Following a formal consultation in 2012 about the future of Southwark's cemeteries, Southwark Council is proceeding with plans to create burial space in Camberwell Old and New cemeteries. As two years had passed since the consultation an engagement exercise is planned to inform residents of plans for the cemeteries and solicit feedback on those plans. This section provides an overview of the engagement exercises undertaken to date.

5.2. INITIAL ENGAGEMENT

5.2.1 In November 2014 a leaflet detailing plans for Camberwell Old and New cemeteries is sent to approximately 1,400 households living in close proximity to either of the cemeteries. An invite to upcoming exhibitions is sent at the same time

5.2.2. In early December, three exhibitions of plans for the cemeteries are held in local venues (Saturday 6 December, 10am-12pm, Monday 8 December 6-8pm, Wednesday 10 December 2-4pm). In total 46 persons attend the three events.

5.2.3. Of those who attend the exhibition: 20 are concerned about ecological aspects of the plans, 10 are satisfied with the plans as they stand, 8 are concerned about tree loss, 7 are concerned about the boundary line of the cemeteries, 6 are concerned about entrances and access to the cemeteries, 6 are unhappy about the engagement process.

5.3 FURTHER ENGAGEMENT

5.3.1 At the request of some residents, LBS arranges a public meeting on February 11 2015. A panel including senior LBS officers, environmental experts and the LBS cabinet member for the environment answer questions from the audience. An exhibition of plans is held prior to the event. The exhibition is attended by 15 persons and the public meeting by 95 Southwark and Lewisham residents.

5.3.2 A campaign group, Save Southwark Woods, is formed and actively opposes the plans. At the public meeting on 11 February, SSW presents a petition, signed by 3,076 persons, to LBS. The online petition was created using the campaigning website 38 degrees, signatories not restricted to residents of Southwark.

5.3.3 A template email (created by SSW) is received from 113 persons following the public meeting. A further 44 individual responses to the public meeting are also received. Of the 157 emails, 153 included concerns about trees, 151 included ecological concerns, 143 included concerns about consultation process, 37 included concerns about disruption, 2 included concerns around entrances and exits, 2 included concerns about boundary lines.

5.4 STAKEHOLDER GROUPS

5.4.1 To address the concerns of residents and try and reach a compromise on the plans for the cemeteries, a stakeholder group is set up. The group includes representatives from Friends of Camberwell Old Cemetery, Friends of Camberwell New Cemetery, Friends of Honor Oak Rec and the London Wildlife Trust. Three meetings are scheduled: 2 April 2015, 30 April 2015 and 10 June 2015. A fourth, scheduled for 15 July 2015, is subsequently added.

5.4.2 A request is made by members of the stakeholder group to walk around area D1 in Camberwell New Cemetery. This walk takes place prior to the stakeholder meeting on 30 April. London Wildlife Trust is also commissioned to provide recommendations on area D1.

5.4.3 Following recommendations for London Wildlife Trust and from the stakeholder group, plans for D1 are revised to provide approximately 145 burials plots rather than the 220 originally proposed. The revised plans retain more trees in D1. Consideration is also taken of stakeholder group members preference for less ostentatious memorialisation.

5.5. COUNCIL ASSEMBLY

5.5.1. SSW presents its objections at full Council on 8 July. Council proposes an amendment to the Save Southwark Woods motion. An email is sent to all those who had previously contacted the council raising concerns, updating them about the latest development.

5.5.2. A consultation with funeral directors, stakeholders and the Diocese, about types of memorialisation to be used in both cemeteries, is planned for the end of July.

