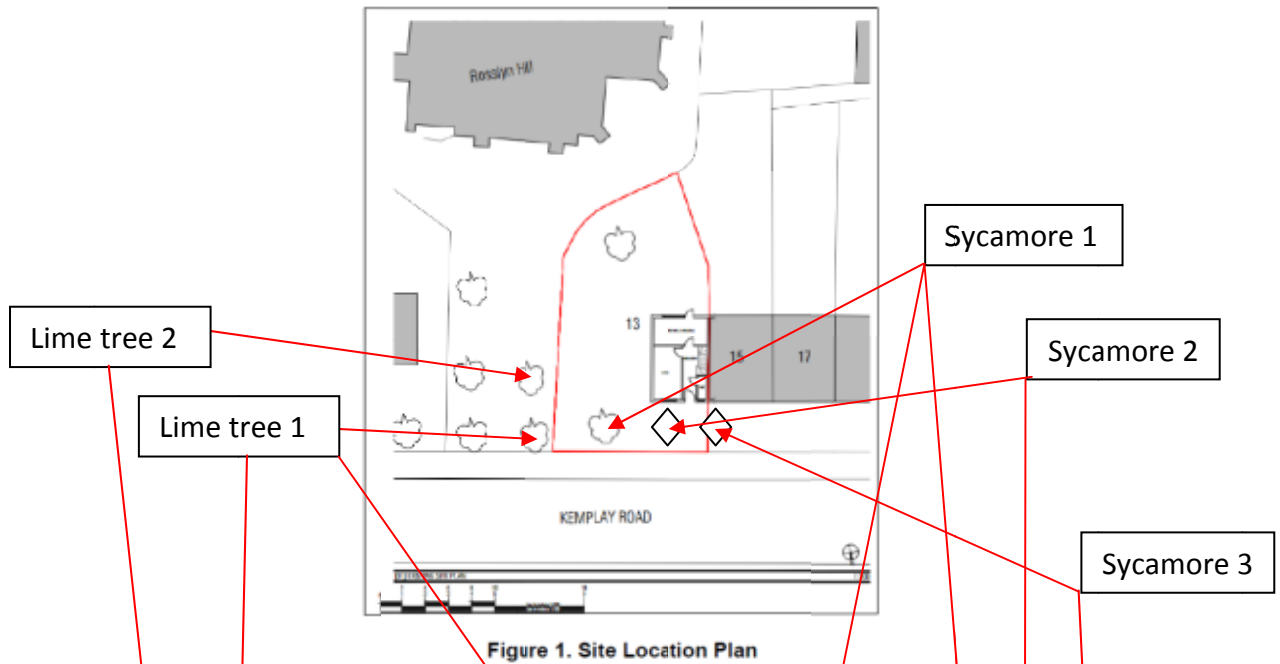


2015/4373/P 13 Kemplay Road

I wish to object to this application for the following reasons:

1) No tree plan or arboricultural report has been submitted. There is no reference to trees in the application or on the existing and proposed plans. Using the site location plan where a few of the existing trees are shown and others added by me as diamonds, this is compared to photographs taken November 2014 when individual trees can be seen. All trees in the photographs are still standing. The importance of these trees for streetscape amenity can be easily observed. All are to be felled without replacement or will not survive the damage done to them by construction vehicles and excavation as BS5837 (2012) is not being applied.



Photos 1 & 2: Corner of lane to Rosslyn Chapel & 13 Kemplay Rd, front

Photo 3: Trees, 13 K Rd frontage

There is a line of tall sycamores up this side of Denning Road that continues with this line of tall lime trees along each side of the rear entrance road to Rosslyn Hill Chapel to the side of 13 Kemplay Road.

We understand it likely the owner considers them as 'condemned' and as such they require no mention. If these trees are to be condemned for decay, please ensure any permission to remove them includes a section 106 about their replacement with an equal or greater number of tall and similar species trees for the future.

2) Damage to trees and the treescape of Denning Road.

a) Damage to the lime trees along the approach lane to Rosslyn Hill Chapel: basement far too close.

Measurements and calculations of the 2 lime trees according to BS5837 (2012):

	Trunk circumference @1.5m	Trunk diameter @1.5m	RPZ circle radius	Distance centre trunk to fence
Lime tree 1	1.70m	0.54m	6.49m	2.07m
Lime tree 2	1.80m	0.57m	6.88m	1.98m

This brings the RPZ of lime tree 2 well within the footprint of the proposed basement, which from the plans appears to be about 1 or 2 metres at most away from the boundary fence.

Modifications can be made to the shape of RPZs but according to BS5837 (2012) should reflect a soundly-based arboricultural assessment of likely root distribution. A 20% off-set in this case would equate to 1.4 metres which is still insufficient. However, the lane is frequently used for vehicle driving and parking by chapel goers and many events held there, as well as daily parking permitted by the chapel, so the roots will already be growing asymmetrically: more towards the gardens of 11 and 13 Kemplay Road due to ground compaction. The RPZs if anything need off-setting *towards* 13 Kemplay Road rather than away from the basement.

Please ensure any basement boundary remains outside arboriculturalist-assessed RPZs of both limes, taking these factors into account.

b) The Construction Management Plan makes little reference to where construction vehicles will go to remove spoil and deliver the materials for such a large iceberg basement within a residential area. Merely:

3.1.1. "Access to the site throughout the contract works will be via the existing entrance off Kemplay Road, as indicated on the site plan within the appendix to this document. This will form the permanent access to the development on completion of the project."

This information/appendix is not contained within the application posted on Camden's website, though within the Construction Management Plan **6.3 Site Health and Safety Rules** the following is written:

"PARKING OF VEHICLES

Parking of vehicles is restricted to suspended area off site and only to those vehicles essential to carrying out work on site will be permitted. There will be no vehicle parking on the surrounding residential roads."

Since there is insufficient space for construction lorries on site, I assume the developers are hoping to use the lane to the rear of Rosslyn Chapel. This lane is too narrow for lorries however so tree trunk damage will occur.

While the lime trees on either side of the lane to the rear of Rosslyn Chapel will have adapted their roots over the years to the cars driving and parking here, construction vehicles are another matter. Since the proposed iceberg basement and side extension also extends what looks like 6 metres beyond the existing house in the direction of the trees, *it will be removing the roots* likely to already have grown asymmetrically in this direction away from compaction. While a temporary weight-spreading surface can be applied for modest construction vehicles, fully loaded 20-ton lorries are a different matter. BS5837 (2012) seems to indicate that these trees are unlikely to survive such a combined assault on trunk, roots and root adaptation.

3) A new cross-over and hardstanding should be refused; sycamore trees or their replacements preserved.

Providing a cross-over and hardstanding will require not only that the row of high amenity sycamores at the front of the property be removed, but that they not be replaced: a huge loss of green amenity for the street, and rainwater-slowng tree canopy.

A cross-over here would set a precedent for Kemplay Road which does not have any others. This, and the extension of the basement beyond the footprint of the building goes against CPG 4 (Basements and lightwells), CPG 3 (Sustainability) on surface water flooding, and Camden's 'Surface Water Management Plan' (SWMP - part of 'Drain London project'). This report's enhanced modelling has estimated that large numbers of properties may be within the Very Significant and Significant risk bands. One of the key locations at risk of flooding in Camden north is the Willow Road area (Table 6.1 of the SWMP). Surface water from Kemplay Road runs down into Pilgrims Lane and the lower Willow Road area thence into East Heath Road, South End Road and thence to Fleet Road. The Willow Road and South End Green areas (downstream of Kemplay Road) had significant flooding in 2002:



While the Site Investigation Report acknowledges "There is an area of flood risk approximately 30m west of the site along Willoughby Road"- this is 'up-stream', and run-off from the property to others has been completely ignored. Hence they report in the BIA "a very low risk of flooding (the lowest category for the national background level of risk) for No.13 and the surrounding area." Clearly not the case!

According to Camden's draft Local Plan 2015, policy T2 "The Council will limit the availability of parking and require all new developments in the borough to be car-free... will:

- a. restrict off-street car parking...
- c. resist the development of boundary treatments and gardens within existing developments to provide off-street parking".

Please ensure this site is made car-free and not tree-free.

Dr Vicki Harding

Voluntary Tree Officer Heath & Hampstead Society