



December 2018

Our Ref: 71056 / No 55 Fitzroy Park

Fitzroy Park Residents' Association



FAO Mr Harley Atkinson

Dear FPRA,

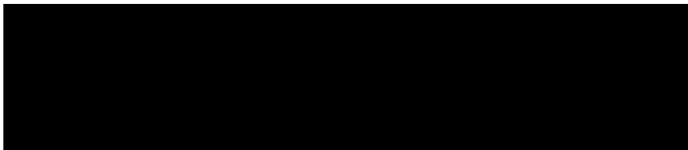
Re: 55 Fitzroy Park, Highgate, London, N6 6HT

Summary Position

Landscape Planning have been commissioned to review various technical reports submitted to LB Camden in support of a planning submission seeking Full Planning Consent to demolish No 55 Fitzroy Park and replace it with five detached properties.

It is reasonable to expect that a detailed planning application is supported by comprehensively researched site information. The planning submission should present an integrated appreciation of what is required to support a proposal which by its very nature will cause demonstrable harm to an undisturbed historic garden adjacent to Hampstead Heath that is filled with trees.

Presenting the arboricultural matters should be guided by the Council's own advice on carrying out an arboricultural assessment. What we have, in overview, is an arboricultural submission with very evident discontinuity between the original topographical survey and the later arboricultural impact assessment.





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BS 5837 2012

The defined Scope of the current version is clear:

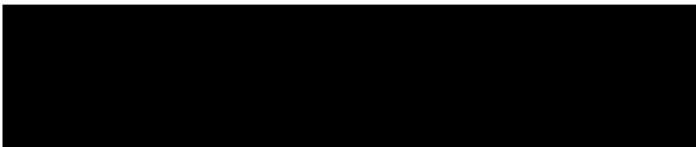
“This British Standard gives recommendations and guidance on the relationship between trees and design, demolition and construction processes. It sets out the principles and procedures to be applied to achieve a harmonious and sustainable relationship between trees and structures. The standard is applicable whether or not planning permission is required”

Section four of the Standard covers *“Feasibility: surveys and preliminary constraints”*. At 4.2.4 (b), we read that the survey should record all trees within the site with a stem diameter of 75mm or more. At 4.2.4 (c), we read that the survey should record all trees that overhang or are located beyond the site boundaries within a distance of up to 12 times their estimated stem diameter.

Tree Surveys Submitted to the Council

In contrast to the above, an analysis carried out on the tree surveys presented to the Council shows the following:

- The total number of trees with a 100mm diameter or over as shown on the original topographical survey carried out by P Stubbington Land Surveys Ltd on behalf of the applicant (Drawing No 5826/01, dated November 2016) is approximately 121. These figures do not include trees with a 75mm diameter as required by British Standards.
- In comparison, the BoSKY Tree Survey, dated six months later in May 2017, includes just 75 trees. Of these, 7 are under 100mm and 68 over 100mm.
- When compared to the original Stubbington topographical survey, these figures represent a discrepancy of 52 trees over 100mm, which equates to a minimum of 40% under-reporting of existing trees on site. It is also reasonable to suggest that an additional unknown number of trees with a diameter of 75-100mm could also have been under-reported.
- This report also makes no mention of the two TPO trees on site, namely a Walnut and a Hawthorn to the western edge of the site along Millfield Lane.





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- It has also been noted that the first design proposals for 5 new houses were presented to LB Camden by 21st Architects in October 2016, predating the topographical survey in November 2016 by a month and the official BoSky tree survey in May 2017 by 6 months.
- These discrepancies do not discharge the requirements of 4.2.4 (b) of BS 5837 2012.

A similar critical assessment of off-site trees confirms the following:

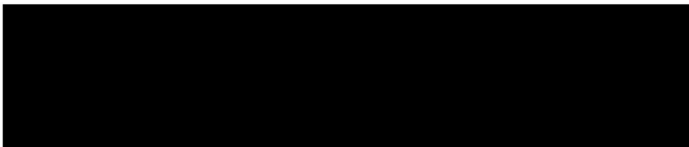
- No privately-owned neighbours' trees adjacent to the Fitzroy Park carriageway have been surveyed by BoSKY.
- No trees managed by the City of London and located adjacent to Millfield Lane on Hampstead Heath and the Bird Sanctuary Pond have been surveyed by BoSKY.
- No trees in neighbouring curtilages in Fitzroy Lodge, 53 Fitzroy Park and the Water House have been surveyed by BoSKY.
- These discrepancies do not discharge the requirements of 4.2.4 (c) of BS 5837 2012.

Turning to causing harm to the environs of the Fitzroy Park carriageway, we note the following:

- The very low CBR ratio of 2-3% for the Fitzroy Park carriageway has not been mentioned or assessed in the context of the risk of compression by HGVs on RPAs along the site access route.
- As a consequence, the construction impacts on these trees have not been assessed.
- This fails British Standard 5837 2012.

Presence of Garden Orchard Trees

Orchards are included in Camden's latest guidance on biodiversity, issued in March 2018. Yet there is no evaluation presented in this planning submission on the value of the existing 22 orchard trees in the garden of No 55, which we are advised elsewhere is land that has been in the ownership of the applicant's family for 75 years (and is therefore a garden that has an undisturbed history, other than regular grass cutting and use by one family). It is clear that



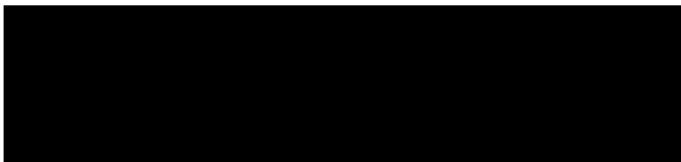


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Camden's Local Plan places value on non-designated spaces, such as this type of garden in Private Open Space adjacent to Metropolitan Open Land.

The discontinuity, both within the reports and between the topic reports, becomes magnified when considering various construction impacts:

- The reduction of existing site levels for all 5 Plots by 1.5m – 2.5m and similar levels of re-contouring across this very large site has not been cross referenced with the impact on the RPAs of those few trees which are to be retained.
- The significant ground works that create large mechanically stabilised bunds around the pond and along the boundary with Millfield Lane (as per LUC drawings 7122/010 and 7 associated boundary sketch plans) have not been cross referenced with the arboricultural survey.
- The over-engineering (by means of the liberal use of retaining walls and sheet piles) of this currently open landscape will create significant hazards for the local ecology, reducing continuity across the site, not increasing it as claimed.
- While the site is not formally designated as SINC METRO, it currently acts as such (and arboricultural impacts should therefore be considered in this context), as can be seen from the attached photograph showing a seamless transition in the tree canopy from the Fitzroy Park carriageway towards the Bird Sanctuary Pond on Hampstead Heath.
- No assessment has been made of any of the numerous and-varied drainage proposals, such as swales, SuDS, gallery drains, linear drains, foul and surface water drains, that will inevitably criss-cross the site and how these will impact those retained trees' RPAs on site or other mixed vegetation along boundaries.
- No assessment has been made of the newly created on-site construction road, the recently proposed HGV turning circle, the site cabins and storage areas for spoil and crushed bricks, or the use of heavy construction machinery on this site in close proximity to the RPAs of retained trees.





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The discontinuity, both within the original CMP report and now in the supposed "FINAL" version, becomes magnified when again considering various construction impacts which have in no way been addressed by the AIA submitted:

- P9 - The proposed driveway bellmouth access with the FP carriageway is located to avoid impact on root structure of adjacent trees, but these trees have not been surveyed so there are no details to evaluate.
- P10 - Re the Demolition phase, there is reference to a turning circle being created. There is no detail provided with respect to where this will be placed or how this will impact the RPAs of the few retained orchard trees.
- P46 - App A - The entire front boundary is to be replaced with hoarding, thereby losing the current soft frontage and directly altering the character of the Fitzroy Park carriageway and associated environment.
- P47 - App B - Acoustic sound barriers are shown, but no reference is made to the impact on retained tree root plates.
- P50 - App E - The proposed construction access post demolition ignores the constraints of the earlier and apparently final issue of the AIA and the associated RPAs of retained trees.
- P52 - App G - MSE retaining wall to support access road - no comment is made on ecological impacts.
- P53 - App H conflicts with App D & App E.
- P54 - App I, the new access road, conflicts with App H.



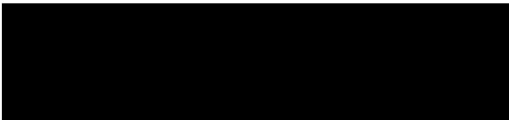


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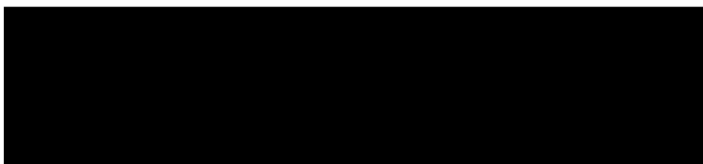
In conclusion, accessing the site in its entirety is fundamental, so it is therefore surprising that an assessment of the damage that will be caused to the environment intimately associated with the Fitzroy Park carriageway and how this would be remediated to the satisfaction of FPRA (and other local stakeholders) is entirely absent. Any study of harm to the roadway would itself have to reopen the fact that the AIA is entirely silent on impacts outside the applicant's red line boundary.

We trust that the above information is of assistance and look forward to hearing from you in the near future. If you have any further queries regarding this matter, then please do not hesitate to contact us.

Yours sincerely,

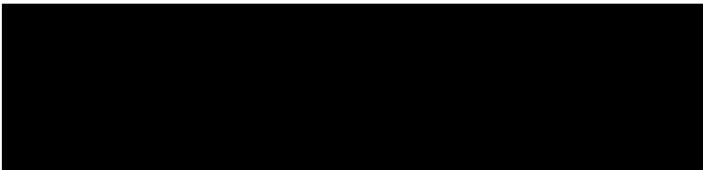


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Principal Consultant Arboriculturist





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KEY TO SHADING

Existing Buildings
Proposed Buildings
Proposed Roads
Proposed Paths
Proposed Drains
Proposed Fences
Proposed Walls
Proposed Gates
Proposed Poles
Proposed Posts
Proposed Signs
Proposed Light Fittings
Proposed Planting
Proposed Landscaping
Proposed Water Features
Proposed Other Structures

**P STUBBINGTON
LAND SURVEYS LTD**

CLIENT	SPURRING
CONTRACT	SPURRING PHASE 2
TITLE	LANDSCAPE SURVEY
SCALE	1:500
DRAWN BY	W.D.
CHECKED BY	W.D.
DATE	NOVEMBER 2016
SCALE BAR	1:500