

# Comments on the *Landscape and Visual Statement*

(Statement dated April 2006)

By Campion Concerns 3<sup>rd</sup> July 2006. (Additional notes 19<sup>th</sup> November '06).

## Tree Survey

- Tree Survey Plan not of sufficient scale to read the tree numbers!!! Is this deliberate?
- Tree Survey key colour, not clear which trees are to be retained and which to be removed, which makes it confusing and worthless for planning or monitoring.
- Only 2 Trees were considered to be Cat A = 'retention most desirable' and the general descriptions of all trees /shrubs appears to be negative in the extreme.
- LBH should require the tree survey to be to the Latest BS5837 (2005) with colour key.
- Described as 'initial Arboriculture Survey', so where is the detailed one?
- Application Drawing provided shows some trees to be retained which are under a proposed building; this confirms the baseline is confusing to all parties.
- No mention of local history and Sir Joseph Banks' influence and some trees may be of this era. There should be a check for Spanish Chestnut and American cranberry and for the age of the Yews and cedars.)

### *Additional note 19.11.06*

Action: A proper, i.e. Readable, Tree Survey to the latest BS 5837, is still awaited to produce a clear and historically correct Tree Survey. We recommend that, to get a competent survey, advice is sought from Kew Gardens specialists who provide a service for such problems.

## Main document by Lovejoy

- CH Formal Gardens do not extend to Church Road (original layout CH) and proposed is minimal dimensions and does not extend to include the curtilage of the main house. It also proposes to remove part of the central path which forms the original layout.
- LOS proposed south of site is minimal, difficult to access, and low quality in many aspects.
- Encroachment or loss of LOS is more than 15% (see access roads, light wells, secure area etc).
- The pitch and any possible sports-related use in the south of site would be removed without proper public consultation of alternative recreation or sports use (as required by PPG17).
- Courtyards are NOT of equal quality and replace green space with hardcore paving etc.
- Courtyards not suitable base for large tree types, which it removes (overall harm).
- If the Tree Survey is the baseline then this document and any other plans based on it will be compromised by its questionable data.
- Much of the open area of the present frontage will be taken for 'private use'. Even so the "private amenity space' does not meet the SPG requirements of the UDP. Arguing that the publicly accessible area is for 'dual use' does not get round this.
- Misleading statements:
  - ◆ Uses words such as 'opportunity', 'potential' etc (e.g. play areas etc);
  - ◆ 'The site is partly covered by Local Open Space Designation' (is actually 2.1 ha);
  - ◆ Mature and Semi Mature trees 'should be retained' whereas its own plans shows removal of many. The tree survey is not at all clear what is actually on the site and where;
  - ◆ Mature trees replaced by 'ornamental' – basically pot plants with no deep roots;

- ◆ *Majority of existing mature vegetation will be retained (this could be as little as 51%) no numbers provided. Looks like 50 + trees could be lost;*
- ◆ *5.19 and 5.20 need to be challenged re nature conservation (see note below).*
- Pond not mentioned and not replaced – how does this enhance biodiversity?
- Play areas are only ‘potential’ and appear to be small
- Screen hedging used extensively, could block views of CH and remove large areas of usable public LOS to ‘protect’ the private areas.
- All public access is via gates (who operates and controls entry and what guarantees public access will be provided long term?)
- Conclusions not supported by actual plans
- No mention of history of site re Sir Joseph Banks, Kew Gardens, no local research. Banks owned and lived in the Spring Grove Estate for c40 years and experimented with species and the general area acted as a nursery for Kew (various sources inc Natural History Museum)
- Bat roosts must be fully investigated ‘pre application’ (bats exist within 100m of site).
- Public clearly being discouraged from using LOS by layout and numerous gates.
- Loss of mature or semi mature trees which cannot be replaced LIKE for LIKE even over time.
- Would harm the conservation area and harm the wildlife habitat.
- There is no presumption to retain trees or treat /repair trees.

**Action: Review and rewrite main document when new Tree Survey provided per above. Include LBH Lucy Griffiths Environmental Strategy Civic Centre in correspondence and input.**

***Additional note 19.11.06. Planning Issues:***

- Loss of Local Open Space
- The open space proposed is of a poorer quality
- Loss of a sports pitch (now confirmed by Sport England as material, a sports pitch does exist)
- Loss of many trees in a conservation area and not able to replace like for like due to proposal design.
- Inadequate survey and reporting of existing site prior to design or making application
- Security by design not addressed
- Biodiversity is **HARMED not preserved or enhanced with these proposals (loss of pond, roosts etc)**

**Biodiversity**

- Various supporting documents claim the biodiversity of the site will be enhanced. The following are reasons for doubting the value of these claims:
- Mature Pond being removed (contrary to LBH environmental advice).
- Damaged or even dead trees are natural habitat for many species yet have been dismissed in the Tree Survey as worthless.
- A large area of ‘green’ open space, will be replaced with:
- Man made courtyards without deep sub soil due to underground car park;
- Hard standing roads and paths have been included in the remaining open space area;
- Buildings, the claim is 15% of actual building encroachment;
- Courtyards will lack long daylight hours / in shadow;
- In total loss to open space will be much more than 15% claimed.
- Natural landscaping generally replaced by ‘managed’ landscape, including pot plants.
- Existing habitats will be disturbed during construction as most of the current open space is

impacted by current plans.

- Long established species may not return once disturbed. (Nesting birds etc). For instance Woodpecker pair have been seen on site annually.
- Not clear how claim that vegetation is increased can be justified given above. Certainly not vegetation the of the same biodiversity quality .
- No proper wildlife survey has been carried out and it is now a requirement that a bat survey at least is carried out by an independent consultant as bats exist in the area and should have been carried out prior to application and design phase. Animal borrows exist on the site and have not been investigated or impact of development reported.

### **Biodiversity advice from LBH site**

Advice is provided in the following: [www.hounslow.gov.uk/contrast/biodiversity-actionplan.pdf](http://www.hounslow.gov.uk/contrast/biodiversity-actionplan.pdf)

This includes advice on the items listed below.

2.2 ..Gardens especially those with ponds, often have a greater biodiversity than many areas of our larger urban green spaces...

2.3 ..At the other end of the spectrum large gardens as in parts of Osterley could be described as nature reserves in there own right...

3.1 ..Veteran or deceased trees have ecological importance

5.1.2 All Bats and some tree-hole nesting birds are protected by wildlife and country act

**Action: We have asked for a visit from LBH environmental specialist to review site for nesting and bat roosts to ensure developer does not remove any evidence. Follow up with independent consultant appointed by LBH (from external list) for comprehensive survey of protected species .**

### ***Additional note 19.11.06***

TRY have provided an (inadequate) Eco report in October 2006 . The site was surveyed in December 2005. This report identified:

- potential bat roosting sites in buildings and trees on the site
- 2 bird species on the 'red' list of species of high conservation concerned – means the site must only be cleared between August and February.

The survey states a further survey should be carried between March and September due to the breeding and roosting season for bats. This has not been provided by TRY in 2006.

PPS9 says the site ecological report should be available prior to planning permission , which will not now be complete prior to May 2007.

LBH Environmental officer states: It would be unfortunate to lose the pond .. ponds provide important habitat..

TRY claimed the report says the site is of little ecological importance but this is a total misrepresentation of the independent report.

The impact of the underground car park which extends to large area of the site and under proposed open space has not been fully investigated but it will impact the drainage and biodiversity extending across the site not just the foot print.

Summary: Definite Harm to Biodiversity is clear and a reason for refusal alone.