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Mr. K O'Connor

Director, Project Management

Cranbrook Basements

26-28 Hammersmith Grove

Hammersmith

London W6 7BA

19th March 2014

Dear Mr. O'Connor

Ref: Plant comments on the Royal Borough of Kensington and Chelsea proposed planning policy changes relating to basements.

You have instructed me to review the proposed planning policy changes published by the Royal Borough of Kensington and Chelsea RBKC), and to comment on draft planning policies 34.3.50 and 34.3.55.

I am providing these comments based on my experience and qualifications in horticulture and landscape practices. (Appendix 1)

Changes to garden planting and layout are generally regarded as permitted development - with home owners determining garden planting relative to their own tastes.

Notwithstanding forgoing the minimum 1m soil to be retained above any garden basement will facilitate the reinstatement of the garden to its pre-construction condition if this is required.

Yours sincerely

T David Gilchrist

Comments on the Royal Borough of Kensington and Chelsea proposed planning policy changes relating to basements as requested by Mr. Kevin O’Conner, Director, Project Management, Cranbrook Basements.

The comments are in response to the issues listed below in A-H

Comments:

The following comments are made with reference to the proposed Planning Regulation changes within the Royal Borough of Kensington and Chelsea *“Basements Publication Planning Policy – February 2014”*

- a) 1 metre of soil is sufficient depth located above a basement structure to plant and grow any deciduous or evergreen shrub, deciduous or evergreen tree, herbaceous perennial, bulb, conifer, fern, alpine, ornamental grass, annual, biennial, vegetables, soft fruit, top fruit and lawns.
- b) By way of illustration the following plant genus can be planted and grown successfully within a soil depth of 1m in an urban London garden. Lavendula, Cistus, Hibiscus, Juniperus, Picea, Narcissus, Galanthus, Monarda, Helenium, Heuchera, Rhododendron, Viburnum, Magnolia, Prunus, Malus, Sorbus. The initial depth of planting will vary according to the pot/container or root ball size that the plant is supplied. This could range from 50mm to 600mm depending on plant type – This is significantly less than the 1m of soil above any basement
- c) Removing the old potentially contaminated soil and replacing it with fresh fertile soil to BS 3882:2007 would be good practice and is a positive feature of the Basement

process. It would reduce the risk of carry over pests, diseases and impurities that can be present in old soils. This source of inoculum would be removed.

- d) Sustainable urban drainage is essential to the Basement construction, would improve the growing environment for all the plants planted in the new fresh soil. It would reduce the risk of anaerobic conditions developing and improve the growing environment overall.
- e) There is no requirement to limit the size of the basement garden as one metre of structured top soil will provide a suitable growing environment for all plant types as outlined in A & B.
- f) Biodiversity is greatly improved when there are a wide range of plants species used in garden planting. Wildlife is attracted to flowering, fruiting and seed bearing plants. It can provide wide ranging habits for wild life to establish and flourish as the garden matures.
- g) The design and character of the garden will be a matter for the owner, given that there is no restriction or limit on the plant types that can be planted and grown. One metre of soil depth provides adequate area for plants to obtain moisture and nutrients to sustain healthy growth.
- h) The planting and growing of trees above the Basement should not be restricted as the vast majority of trees have the greatest percentage of their root systems in the top metre of soil (Forestry Commission: Information Note: The Influence of Soils and Species on Tree Root Depth: November 2005). Tree planting would enhance the aesthetic and biodiversity of the gardens and bring many attributes to surrounding landscape.

- i) There is no impact on changes to Character of Garden following the construction of a basement as you can revert back to the garden design if required.

Conclusion:

1m of good quality, well drained topsoil above a basement structure will provide an excellent environment for the growth of plants and shrubs whilst strongly encouraging biodiversity – restrictions to the size of basements below gardens should not be made based upon concerns over planting or biodiversity.

Unless controlled by planning condition, soft landscape is a matter of choice by home owners which qualifies as permitted development.

Arguments relating to garden character should not be used as a justification for restrictions of basement size.

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