

## **Appendix A – Arboricultural Observations**

### **AIA 5.2.1 Below ground constraints**

We are concerned that the below ground constraints have not been adequately identified. The BS 5837 (2012) states:

*BS 5837 4.6*

**4.6.2** *The RPA (Root Protection Area) for each tree should initially be plotted as a circle centred on the base of the stem. Where pre-existing site conditions or other factors indicate that rooting has occurred asymmetrically, a polygon of equivalent area should be produced. Modifications to the shape of the RPA should reflect a soundly based arboricultural assessment of likely root distribution.*

**4.6.3** *Any deviation in the RPA from the original circular plot should take account of the following factors whilst still providing adequate protection for the root system:*

- a) the morphology and disposition of the roots, when influenced by past or existing site conditions (e.g. the presence of roads, structures and underground apparatus);*
- b) topography and drainage;*
- c) the soil type and structure;*
- d) the likely tolerance of the tree to root disturbance or damage, based on factors such as species, age, condition and past management.*

#### **Eastern London Plane RPA:**

The polygons used to identify the RPAs of the Eastern London Planes is in line with BS 5837.

However, the comment about root pruning is incorrect.

Research is referred to in the AIA. (5.2.1) However, VTG was created in two halves. All affected trees are within the southern half of VTG (southern section east side trees 70017 to 70000). The southern section of VTG was covered in wharves until the late 19<sup>th</sup>C. An act of parliament in 1900 ordered the extension of the garden and continuation of the embankment. This was approved in 1912, the garden was laid out c1913, and opened in 1914. The construction of the embankment and the laying out of the gardens happened at the same time.

It is safe to presume that no root pruning of these trees has ever taken place.

#### **Western London Plane RPA:**

The RPAs are plotted as a circle, and justification is given for doing so. We believe, however, that the polygons used on the Eastern London Planes, should have been used on these trees as well. The pavement and hard road surface to the west of the trees provides a far less favourable rooting environment than the grassed areas to the east. This could be reflected in polygons with a bias to the east. (see BS 4.6.3 a) above).

#### **Known root system information:**

The AIA refers to the findings of a rootzone investigation in September 2018 and asserts that there are no primary roots below 1m. However, the rootzone investigation (AIA 3.2) was only to a depth of 1 meter so this is speculation.

It is our contention that there are likely to be deep roots in the made-up soil of the site. The London plane's tolerance to drought and the urban environment is associated with its deep rooting ability.

### **AIA 5.2.1 cont**

There is an extended comment about the viability of RPAs on page 21. However, it asserts the value of 'professional Arboricultural judgement'. We agree.

*iii This British Standard takes the form of guidance and recommendations.*

*It should not be quoted as if it were a specification and particular care should be taken to ensure that claims of compliance are not misleading.*

*Any user claiming compliance with this British Standard is expected to be able to justify any course of action that deviates from its recommendations.*

### **AIA 5.2.2**

The AIA states that the planes have 'essentially reached their ultimate height and crown spread'. Though the trees are indeed mature, if their growing environment is good, the future growth of London planes in both height and spread is entirely possible. This has not been anticipated in the AIA.

The BS states:

#### **5.2 Constraints posed by existing trees**

.....Above-ground constraints might arise from the following attributes:

- a) the current and ultimate height and spread of the tree;
- b) species characteristics, including evergreen or deciduous, density of foliage, and factors such as susceptibility to honeydew drip, branch drop, fruit fall, etc.

and

**5.2.4** Particular care is needed regarding the retention of large, mature, over-mature or veteran trees which become enclosed within the new development (see **4.5.11**). Where such trees are retained, adequate space should be allowed for their long-term physical retention and future maintenance.

*NOTE* The presence of large species trees is increasingly being seen as advantageous, since it contributes to climate change resilience, amongst other benefits....

### **AIA 5.4.2 Impact of Root Pruning:**

Given the extent of the subterranean construction proposed, the AIA does not adequately address the following issues identified in the BS: future tree growth, destabilization of the trees and the effects on local soil hydrology:

The BS states:

#### **7.6 Subterranean construction within the RPA**

**7.6.1** Where it is proposed to form subterranean structures, e.g. basement extensions, within the RPA, it is essential to avoid excavating down through rootable soil if trees are to be retained. In some cases, it might be technically possible to form the excavation by undermining the soil beneath the RPA.

**7.6.2** The following factors should be taken into account, in light of site-specific and specialist arboricultural, engineering and geotechnical advice:

*the future growth potential of the tree;*  
*the potential for vibration-induced granular flow within the retained overburden, caused by the undermining process, to destabilize the tree through reduced root adhesion;*  
*the potential for adverse effects on local soil hydrology, and the possible impact of these on tree health.*

The report does not adequately address these issues and how they impact long term tree health.

#### **AIA 5.4.2 (cont.)**

The report acknowledges that root pruning of mature trees is likely to result in physiological stress, and some crown dieback may occur. We do not think this acceptable.

The report fails to mention that pruning wounds, whether on roots or in the crown of a tree, are the primary site for fungal infection for species such as *Meripilus sulphureus* and *Ganoderma* sp. both of which are endemic to TRP and London planes.

All will reduce the life expectancy of these mature trees.

#### **AIA 5.4.4**

The main service runs which will trespass into RPA, whether hand dug or using 'trenchless' methods roots will still damage roots. Equally the installation of secondary services and further services will affect tree roots and tree health.

**An Arboricultural Method Statement or outline statement is lacking, and so measures to mitigate all such damage are not detailed. This is a key point throughout the AIA.**

#### **AIA 5.4.5**

Perimeter security is anticipated to be within the RPA of some of the trees on western boundary. An Arboricultural Method Statement is lacking, and so measures to mitigate such damage are not detailed.

#### **AIA 5.5.1**

The construction method of the sheet pile wall will impact the tree roots. An Arboricultural Method Statement is lacking, and so measures to mitigate such damage are not detailed.

#### **AIA 5.5.2**

Soil improvements associated with the footpath network are not fully detailed.

Additionally:

The proposals are full of selective interpretation. There are also lots of remarks that refer to suggested means of protecting the trees as the development continues. These statements offer no support for the proposal as they are retrospective. Once planning is approved, the implementation overrides any conditions and the conditions unenforceable, as it would prevent them from carrying out the planning permission as approved. If the root systems they encounter are larger than an acceptable limit, there is no way of avoiding them being severed.

## **Assessment by reference to the arboricultural surveys and reports**

Firstly, it is clear to any arboriculture professional that the root protection areas of the trees will be breached by the proposed development and development and associated excavations. These trees are large and they need a significant root system to maintain them. The proposals identify significant excavation of between 3–10m below ground level as close as 4-5m from the trunks. Deep excavations will require the roots to be severed, and loss of the roots will result in significant harm.

Trees are protected on development sites by the establishment of a Root Protection Area (RPA). The RPA dimensions are identified in British Standard 5837 (2012) Trees in relation to design, demolition and construction – Recommendations, which set out the approach to estimating the location of RPAs, and the approach was established by reference to research and by agreement with expert panel of professionals. Arboricultural professionals may disagree on the interpretation of some aspects of the British Standard, but the basic principles are agreed and applied by all. The guidance clearly sets out how this area can and should be adjusted to allow for variations on the tree's environment. Notably, the radial area for protection can and should be adjusted, to increase it if there are obvious features that will have influenced the growth of tree roots.

- The river wall adjacent to the row of trees along the eastern boundary with the River Thames is roughly 2–3m from the centre of the tree trunks and will have prevented normal root growth beyond its physical location below ground for a depth of up to 12metres or more.
- The highway beyond the western Millbank boundary will also restrict root growth out under the highway for the trees along that side, and evidence and research show that roots will not develop beneath the dense services and road foundations.

In these cases where there is a restricted root environment on one side, the root protection areas should increase on the opposite side, because a tree needs a proportion of roots corresponding to its size and species. The extent of excavations and development new hard surfacing within RPAs seems to significantly exceed the BS 5837 recommendations. The development and excavations for the memorial would therefore be well within the RPA and the depth of the excavations would cause significant tree root loss. There is no evidence to support this area being reduced.

### **Root Assessment**

Plane trees can and often do root down to depths of 4–6m, and sometimes deeper. The report reinforces this. The root survey has identified roots only as deep as a metre and didn't find any significant roots. This does not mean that they are not present. If the roots are not present in the surface, they must be deeper as the trees cannot survive without an extensive root system. For that reason, a reliable assessment of the impact of roots that will be cut must be made before planning permission is granted, otherwise the damage cannot be assessed. The reports make statements that suggest that the roots will be assessed when they are excavated, and a programme of work put forward at the time to help the trees recover. Some plane roots can be as large as 800mm diameter and be many decades old. Significant root loss like this can't be recovered and encouraged to grow back by adopting techniques such as irrigation and fertilisation. Any suggestion that it can is conjecture, especially when there has been no identification of the roots affected.

The trees can also be damaged by changes to the root environment such as hydrological changes. The changes within the gardens are drastic, and soils will be significantly affected by the deep subterranean excavations.

The works will also require a significant amount of indirect infrastructure for workers welfare etc. The portacabins, washing facilities, lorry wheel washing, office space, and plant, machinery and

materials storage will occupy a huge area. The compaction and space required will considerably reduce the amount of space available for tree protection. This hasn't been accounted for on site.

### **Trees as Landscape Heritage importance**

The plane trees form two individual avenues framing the gardens to the east and west, and forming a natural corridor as two distinct features. The importance of the two London plane avenues as heritage tree features in visual, and cultural terms, as part of a large and visually prominent group in central London in an area where there are no other similar features, cannot be stressed highly enough. They frame the listed historic gardens and abut the UNESCO Westminster World Heritage Site in their location directly adjacent to the Palace of Westminster and frame historic views to the north and south as well as forming a visual cordon to the historic River Thames bank, defining and improving the setting of Victoria Tower Gardens.

As such, the individual loss of one or more of the trees would destroy the value of the avenues as two distinct features, and break up the vista, causing the connectivity and vista to disintegrate. The gaps could not be replaced. The impact on the trees which are closest to the development must therefore be considered in terms of the impact on the two avenue features, and their landscape as a whole, not as individual distinct trees and the contribution they make to the landscape and intonation of the gardens and the surroundings.

## **Appendix B - Ecology & Conservation Observations**

The Environmental Statement (Atkins, October 2018) has been reviewed along with other relevant documents submitted with the planning application (including the Design and Access Statement, etc.)

After responding to the EIA scoping report, we are pleased that our recommendation to include rather than exclude Biodiversity in the ES has been followed. The proposals will have effect on ecological features during construction and operation. The ES covers Biodiversity in Chapter I I and has been informed by a biological records review from Greenspace Information for Greater London, Extended phase I habitat survey and bat surveys (visual inspection only). This appears an appropriate level of survey given the findings of the habitat and bat inspection surveys, although this can only be confirmed if we have access, as we recommended in our scoping response, to the actual survey reports.

### **Bats and invertebrates**

Victoria Tower Gardens is one of the few remaining relatively dark spaces adjacent to the River Thames in Central London. It is likely to be an important flight path for bats and night flying invertebrates. The report states that the initial Phase I Habitat survey and bat roost assessment sought to identify trees and nearby buildings with bat roost potential. The assessment of potential roosting sites for bats was undertaken in accordance with good practice guidance and CIEEM competencies for undertaking bat surveys. It is reasonable to use the visual inspection to help determine the need for follow-up bat dusk/dawn surveys and roost surveys. Although no evidence of roosting bats was recorded on the site, the visual inspection report wrongly downplays the possibility of roosts in the nearby buildings. Therefore, the line of trees and river present foraging and commuting opportunities for bats. The updated National Planning Policy Framework states that new developments should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. Artificial lighting is also known to exert a range of negative impacts on many different kinds of animal wildlife including significant behavioural modification, disorientation and disruption of the diurnal and seasonal rhythms of bats and birds. Given that increases in lighting have an impact on wildlife, habitat improvements and enhancements are required to lessen any decreased resilience. These should be informed by an ecologist to ensure the proposed lighting design delivery is appropriate given ecological sensitivities.

### **Birds**

Common species of birds including blackbird, robin and carrion crow were all recorded foraging within the site during the phase I survey. Though the footprint of the Scheme is confined to amenity grassland, which is of lower ecological value, this grassland type will still be used by foraging birds and its removal should nevertheless be considered a loss. Therefore, any proposals should create new or improved habitats that result in positive gains for biodiversity. A breeding/nesting bird survey should be undertaken immediately prior to the construction phase of the development, to ensure that nesting birds are not disturbed. It is unclear how the memorial itself could be affected by visiting or nesting birds, squirrels and other wildlife and then how this will be managed.

### **Ecological network**

The site is part of an ecological network, and its value as a stepping stone to other habitats should not be underestimated including along and across the River. Again, any reduction in habitat (amenity grassland) and increased disturbance (lighting) should be compensated for. The viability of reseeded areas including more wildflower and wild grass diverse swards need to take into account the shaded nature and soil quality of this area of VTG. The value of the adjacent Thames has been identified, including designation as a SINC, and a range of mitigation and enhancement measures are suggested, which may address impacts while delivering biodiversity gain. However, to ensure this we suggest an endowment/S106/CIL that provides for further biodiversity and park management works that could be flexible to cover ongoing impacts of having up to 1 million extra visitors to VTG. An ecological

management and enhancement plan would provide such confidence. A s106 offer from Westminster City Council in respect of on-site and off-site environmental improvements should include VTG and support to TRP to manage the site.

## **Appendix C - Sustainability Observations**

### **Air emissions**

Minimise air emissions by machinery, plant and generators during construction:

- Accurately specify generators for the power output required and use low emissions generators such as solar, hybrid gas or hydrogen fuel cells or mains power where possible rather than diesel or petrol generators.
- Correctly specify machinery and plant for the job (not oversized), minimise use of petrol/diesel powered machinery and use highly efficient equipment to minimise emissions and energy requirements.

Air quality monitoring:

- We would like to have access to the air quality results from air monitoring and inspections during the construction stage, which is identified as a mitigation measure in the Environmental Statement.

### **Water**

Water used during construction stage should be non-potable where possible. This would include for example water used on dust sweepers.

The same applies to the operation of the site. Where possible, we would like to see untreated water, for example from rainwater harvesting, used instead of mains water, as well as the installation of water efficient appliances and fittings.

Note: Drainage seems to have been properly taken into account. The scheme was designed for an increase of 40% in peak rainfall intensity as an allowance for climate change.

### **Waste management**

The Waste Management Strategy does not cover the construction period. We would like to have an agreed zero non-hazardous waste to landfill commitment for the construction stage, as well as industry best practice recycling rates. We would like to have the site waste management plan agreed with the Royal Parks, if possible.

The waste management strategy during operation should also be agreed with the Parks.

### **Materials**

Favour materials with low embodied carbon, durable and locally sourced (as mentioned in the Environmental Statement), with high recycled content where possible. All timber certified FSC or PEFC, as mentioned in the BREEAM pre-assessment report.

Note: The scheme already makes use of high-quality, durable materials to reduce the need for replacement over its life cycle, which is good.

Note: The **energy** side seems to be good, they will have to achieve BREEAM excellent as a planning requirement and have incorporated various and water saving design features.

I would suggest that it is essential to have all the mitigation measures identified in the Environmental Statement defined as planning conditions in order to mitigate adverse impacts during construction and operation.

## **Appendix D - Operational Observations**

### **Visitor Numbers**

We note that at an estimated 1 million visitors a year may be predicted to visit the garden, with 3,000 people per day passing into the Memorial. However, we note an additional 7,000 a day visiting the Gardens but not entering the Memorial are predicted. These 10,000 additional visitors a day will have a significant impact on the Gardens in respect of character, appearance, visitor flow, and wear and tear on the green infrastructure and hard fabric. There is a potential for outside queuing at peak times.

In arriving at potential available capacity for the Gardens it is noted that visitor surveys were conducted outside the known peak months of June, July, and August.

### **Security**

Reference is made to counter terrorism engagement and there is an expectation that stand off measures will be required around the perimeter of the Memorial and Learning Centre site for security purposes. TRP will need to be presented with the design proposals for its approval which will need to not detract from the landscape character of the Gardens. Assurance will be needed that these can be installed without damage to the flora and fauna of the Gardens, and that day to day park operations can be conducted without hindrance, with these security measures in place.

Mention is made of a drop-down bollard at the east gates opposite Dean Stanley Street. TRP contactors currently have operational access though the remaining gateways into the Gardens also – currently with the exception of Pankhurst Gate - and TRP need to know what the proposals are for the remaining gateways or if operational ability will be lost?

### **Playground**

The repositioning of the Horseferry Playground and the catering kiosk will change the size and result in loss of overall space of the playground. This at a time when there is predicted to be an increase of visitors to the gardens at peak times of 10,000 per day.

TRP would like to see exact design specification of the new proposed play equipment and what the loss of capacity will be within the playground with the new layout. The relocated catering kiosk is now shown as shared space with staff cycle parking and emergency generator. Will there be there loss of servery space?

Confirmation is needed that the playground still be accessible for the community during the period construction works.

### **Vehicle movements and operations**

While plans show how vehicles to and from the Memorial and Learning centre will be managed (deliveries to external loading bay, evening collections) there is no reference made to tolerance for park operations. Landscape Maintenance operations alone (cleaning/bin emptying/grass cutting/horticultural maintenance/leaf clearance etc) can currently see up to 8 separate vehicles entering the Gardens during the course of a single working day at peak times of the year. This does not include for maintenance work to toilets, playground, hard infrastructure or tree work by arboriculture contracts.

Mention is made for refuse from the catering kiosk being relocated to the Learning Centre bin store for evening collection, however the reality is that under current visitor numbers, bin emptying can require 3 separate collections a day in peak times.

Given additional visitor numbers and the intention of school/coach groups pre-meeting outside the entrance pavilion, vehicle access and egress through the existing gates is likely to create potential hazard and may lead to vehicles waiting outside the gates thereby partially obstructing the footway or traffic lanes.

Allowance also need to be made for cash collection from retail unit and restocking.

It is anticipated that unless there are human intervention controls in place, additional coach drop off, and taxi drop off and collection will still take place on Millbank, affecting traffic flow? While additional cycle racks will be provided on Millbank there is nothing to prevent bicycles being brought into and locked up in the Gardens.

### **Design and Character**

The Memorial Courtyard has been designed as a unique contemplative space “that defines the relationship between the Entrance Pavilion and the Memorial” The courtyard allows visitors a “calm moment of reflection”. It is suspected that the courtyard has been required a stand-off security measure and has resulted in an additional footprint and loss of amenity space not previously envisaged?

TRP would like to see exact design details and maintenance routine for the neutral railings which are intended for between the blades at the top of the slope.

While attempt has been made for the Grade II\* Buxton Memorial still to be viewed from the perimeter of the Gardens from Millbank, the full-sized view of the memorial as seen from Dean Stanley Street and St John’s Smith Square has been lost.

### **Paths**

The shown arrangement of path layout does not allow for maintenance vehicles conducting park operations to complete a circuit of the Gardens to allow vehicular entrance and exit, and neither seemingly is there an allowance for safe turning. Currently the Gardens takes vehicles up to 7.5 tonnes for specific park operations.

It is considered that an additional link path needs to be retained between the Burghers of Calais and the new north-south curved path to avoid creation of a unwanted desire line on the grass.

The lighting installation for illuminating the footpath indicates an introduction of an urban streetscape into the Garden which fundamentally alters the character of the Gardens to an urban park.

Will public pedestrian access be available to the Garden during the construction period; for visits to the Memorials and local resident access?

### **Use of Memorial**

We note that there is mention of events (that may take place) outside of normal Hours of Use of the Gardens? Detail of how this will be managed after the Gardens closing time and locking time is unclear.

### **Land Use and Maintenance**

The gradients for the grass slope rising to the top of the Memorial will alter the methodology of the grass cutting and maintenance operation. This and the creation of additional planted borders is likely to increase maintenance costs for the Gardens.

We note the requirement for 90mm and 63mm water pipes to be run from Millbank into the Gardens to the Learning Centre. This will need to be done without damage to the existing shrubs, perennials, and trees which line Millbank.

The landscape currently contains some heavy soils which have a tendency to retain moisture. With the increase of impermeable areas rain run-off will be increased and which will be accelerated by the angle of slope.

## **Appendix E – Stakeholder Engagement Observations**

We note the substantial consultation activities undertaken with local residents, stakeholders and visitors.

We further note the strong majority opposition recorded by this consultation to the choice of location of Victoria Tower Gardens.

This is echoed in our own experience with the stakeholders we engage with. The concerns expressed to us are similar to those listed in the report, including:

- The impact of additional visitors on the Gardens;
- The impact on users' enjoyment of the space;
- The impact on the amount of green space available locally;
- The management of coaches and construction traffic, and the associated impact on road congestion;
- The potential increased security risk;
- The impact on the trees.

## **Appendix F – Response to Scoping Opinion**

Mr D Dorward  
Development Planning  
City of Westminster  
PO Box 732  
Redhill  
RH1 9FL

22 August 2018



Dear Mr Dorward,

**18/06416/EIASCR | Request for scoping opinion for the Installation of a Holocaust Memorial and Learning Centre at Victoria Tower Gardens pursuant to Regulation 13 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. | The Victoria Tower Gardens Millbank London SW1P 3YB**

We note that the developer’s planning consultant has requested a scoping opinion from Westminster City Council to help identify the issues to be included in the environmental information and has provided a copy of the Atkins Report titled “Holocaust Memorial EIA Scoping Report” dated July 2018 to assist with the task.

Before we proffer our comments, I feel compelled to point out that The Royal Parks, which manages Victoria Tower Gardens on behalf of the Secretary of State for Digital, Culture, Media and Sport, has not agreed to the siting of the proposed Memorial and Learning Centre in Victoria Tower Gardens. The purpose of The Royal Parks is to care for the parks it manages for everyone to enjoy now and in the future. One of our goals is to protect and conserve the listed landscapes that we manage and protect the intrinsic qualities of each open space and ensure no net loss of green space across the parks.

Hence, our comments on the issues to be included in the environmental information are strictly on a “Without Prejudice” basis.

**Our comments on the Atkins’ Scoping Report are as follows:**

A lot of the detail in Atkins’ Scoping Report has not been discussed or agreed with The Royal Parks.

### **Executive summary**

The Royal Parks has not seen any of the preliminary supporting studies such as the ecological appraisal.

### **Introduction**

A third party constructing a memorial and/or a building within The Royal Parks' estate would be responsible for the repair, maintenance and renewal of that memorial and/or building in perpetuity. An agreement would be required to install the structure and a separate agreement would be required to retain the structure as well as providing compensation to The Royal Parks for the additional running costs of managing Victoria Tower Gardens if the forecasted increase in additional visitor numbers materialises.

## **2. SITE AND PROJECT DESCRIPTION**

### **Clause 2.2.1 Construction**

The report states that there are “no existing buildings” in Victoria Tower Gardens. However, there is an education centre located in the northern part of the gardens as well as toilets and a catering outlet in the southern part of the gardens.

### **Clause 2.2.2 Operation**

Out of hours access for special events or functions held at the Learning Centre has not been discussed or agreed.

## **5. BIODIVERSITY, FLORA AND FAUNA**

The developer should liaise and share their preliminary studies with The Royal Parks' ecologists to determine whether the proposed project would have any significant ecological impacts upon the park and consequently whether ecological effects can be scoped out of the EIA. From some of the preliminary designs that The Royal Parks has seen, there is a school of thought that assumes high levels of ornamental lighting and night-time public use. We would object strongly to any such proposal on the grounds that Victoria Tower Gardens is one of the few remaining relatively dark spaces adjacent to the River Thames and an important flight path for bats and night flying invertebrates. Consequently, we do not accept at this stage that there is a case for scoping ecological effects out of the EIA.

## **6. BUILT HERITAGE, TOWNSCAPE AND VISUAL ASSESSMENT**

### **6.2 Baseline conditions**

#### **6.2.1 Location and constituent heritage assets**

The final built area (using areas provided by the Developer) would cover 43% of the Grade II listed park. Consequently, the proposed impact upon the park would be immense. The highest point of the Memorial would be seven metres above the existing ground level and the proposed excavated depth to circa eight metres to accommodate a Learning Centre over two levels (a mezzanine and a basement level), providing an internal floor area of approximately 3,250 square metres (34,983 square feet). This would be nearly twice the area of The Royal Parks' headquarters building in Hyde Park. In addition, the Memorial and education centre is expected to attract 1,000,000 visitors and consequently generate significant localised pedestrian flows, which will have a detrimental impact upon the infrastructure within Victoria Tower Gardens.

#### **6.3.1.2 Effects on townscape and visual**

The Park Manager must approve the treatment of the hoardings.

### **6.3.2.2 Effects on townscape and visual**

With expert in-house arboriculturists, we think that we are best placed to consider the long-term management of the existing trees in the park.

The Royal Parks should also be included in the consultation regarding which viewpoints should be considered.

## **8. Noise**

With an expected one million additional visitors to the Gardens, the impact of that extra footfall in terms of noise upon the quiet enjoyment of existing visitors should be assessed as should the impact caused by regular visitors who will find themselves displaced due to the significant reduction in public open space.

## **9. Population and Human Health**

### **9.3 Potential significant effects and mitigation measures**

#### **9.3.1 Construction**

We note that the developer intends to keep “open [the gardens] to the public as far as possible during construction”. The Gardens are public open space and we would not wish to close them.

We are disappointed to note of the developer’s intention to relocate the play area, toilets and kiosk in the southern section of the Park for the duration of the construction ie three years. In recent years, we have spent many thousands of pounds upgrading the play area and its facilities, including a kiosk selling refreshments to help recover some of the capital investment employed. Such a proposal to relocate such facilities would require our approval.

#### **9.3.2 Operation**

We are disappointed to note that the new heating and ventilation systems could result in increased ambient noise levels.

## **12. Traffic and Transport**

### **12.3.2 Operation**

Generally, all deliveries and operational vehicles should not access the park.

### **13.2 Site Description**

The Royal Parks is aware of a weakness to the river wall where bomb damage was repaired during World War Two with some seepage noticed on previous extreme tides. The Flood Risk Assessment (FRA) must take this into account.

## **Table 14-1 Summary of Scoping conclusions**

### **BUILT HERITAGE, TOWNSCAPE AND VISUAL**

**Desk-based assessments of any designated and/or non-designated assets proposed to be relocated.**

**Options appraisal of new locations for any memorial to be re-sited.**

**Building consent applications.**

While we have no plans to relocate any of the heritage assets currently situated within Victoria Tower Gardens, we are aware of a third party's request to move the Emmeline Pankhurst statue elsewhere. We have also heard of a proposal to move the Horseferry playground (originally created in 1923) elsewhere within the Borough of Westminster, but we have no such plans for the playground.

### **MATERIAL ASSETS (INFRASTRUCTURE) AND CLIMATE CHANGE**

The proposed impacts on drainage and other critical infrastructure and impacts on material assets in operation of the Scheme should be considered.

#### **Water quality and flood risk**

We note that a stand-alone FRA report will be produced to support the planning application.

### **TRAFFIC AND TRANSPORT**

#### **Traffic and transport impacts**

We note that construction is expected to take three years, which is longer than we had anticipated. The developer should be aware of the potential conflict between construction traffic in the park with park visitors, notably school children visiting the existing education centre in Victoria Tower Gardens. In addition, the impact of that construction traffic upon mature tree roots and the longevity of those trees should be considered.

Yours sincerely,

Jane Arthur  
Estates Manager