



Supplemental comments on the planning proposal for the UK Holocaust Memorial and Learning Centre

Victoria Tower Gardens, Westminster

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Summary

The mature plane trees around Victoria Tower Gardens (“the Park”) are a valuable living environmental asset of national importance that could be adversely affected by the UK Holocaust Memorial and Learning Centre planning proposal. This brief report supplements a previous Briefing Note and Report, and should be read in conjunction with those documents.

This supplemental report reviews the further site investigations that have been carried out and concludes that they add no useful clarifications on the impact of the proposal on the trees. As explained in my original report, if Westminster City Council (WCC) is to reliably and meaningfully assess any adverse impact on trees, then more extensive excavations are needed to the full depth and extent of the three-dimensional excavation envelope to identify what roots will be cut, and to properly investigate the air and water movement throughout soil volumes where the trees are rooting.

Jeremy Barrell
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1 Report purpose

This is a short report to supplement a *Briefing Note* published on 13th December 2018 and a more detailed report titled *Comments on the planning proposal for the UK Holocaust Memorial and Learning Centre* published on 4th February 2019 (<https://www.barrelltreecare.co.uk/resources/useful-documents/>). It should be read in conjunction with them and is not intended to be a stand-alone document. It has been prepared as an update to those documents in the context of more detailed site investigations carried out over the last few weeks.

2 Site visits

I visited the site on 14th May 2019 at 1730–1830 to gain an overview of the ongoing works outside of working hours and took several photographs from public viewpoints during that visit. I also visited on 17th May 2019 at 1130–1230 during working hours and was shown around by Donncha O Shea, a Partner with Gustafson Porter + Bowman. Both visits were also attended by Barbara Weiss from the Save Victoria Tower Gardens Campaign. During the second visit, we were able to view an excavation in progress adjacent to the sea wall, perpendicular to the line of the wall and between two of the trees.

During my first visit, it was low tide and I was able to see more clearly the storm relief sewer outlet beneath the southern end of the Park, which is shown in the image below.



3 Site investigation results and my observations

Mr O Shea usefully explained that the investigations were to gain more data on the soil conditions and below-ground structures through a series of excavated pits 2–3m in depth and deeper boreholes. It was hoped that those investigations would also clarify the rooting characteristics of the trees. However, we were informally advised that those investigations did not find any large roots, although some smaller roots were discovered that I understood were less than 10cm diameter. We were advised that the detailed data would be made available in the next few weeks once all the investigations were completed.

The general lack of significant roots close to the surface was supported by my observations of the exposed trench adjacent to the sea wall, where the profile of the wall down to several metres was exposed, and I was able to see the nature of the fill beneath the hard surfacing. I saw some fine roots scattered through a stone and rubble-based fill, but no roots of any significant diameter, i.e. greater than 5cm.

I understood that investigations to identify the course and integrity of the storm relief sewer shown in the image above, and other sewers beneath the Park, would form part of the more detailed data to be provided.

4 Discussion and conclusions from my observations

As I explained in my original report, my primary concern from a tree perspective was whether trees of national importance would be adversely affected by the proposed development. Central to making that assessment is a clear and reliable understanding of whether the three-dimensional excavation envelope for the project would result in significant roots being cut, and whether the new structures would alter the accessibility of air and water to important roots elsewhere in the Park. I concluded that the investigations carried out in late 2018 were not sufficient to reliably confirm that there would be no adverse impact on the trees, and that further, more detailed investigations were required for WCC to be able to properly assess the impact of the development proposal.

Although I have not seen the formal results of all the latest investigations, I have seen the extent of the excavated trenches, and I am satisfied that these do not add any useful or meaningful clarifications on where the significant roots of the trees are located. This is because the trenches, at no deeper than 3m, are not deep enough to provide any indication of where the roots are located at greater depths. Furthermore, in the context of an excavation envelope perimeter that I understand to be in excess of 100m, the small length of excavation and where those trenches are located is not enough to provide any indication at all of where the roots are. Indeed, if anything, the failure to locate significant roots in most of the trenches, and specifically the trench close to the large trees adjacent to the sea wall, strongly suggests that the roots are much deeper in the soil profile than the 2–3m depth investigated. I understand that the boreholes go deeper, but my view is that they do not materially assist in identifying where the roots are, which is a principal requirement to meaningfully assess the impact on trees.

I explain in my original report the importance of the sewers beneath the Park and the lack of information on their course and integrity. That remains unclarified and none of the investigations disclosed to date address that concern. Indeed, water that can be seen dripping from the outlet in the image above, which confirms that there is the potential for air and water inputs into the lower soil profile within the Park, and that remains a matter that needs clarification.

5 Further investigations

I describe the further investigations needed to reliably and meaningfully assess the impact of the proposal on trees in section 5 of my original report. From what I have seen, the recent further investigations do not add the clarifications needed, and so that list still applies. In my experience, and in the context of the lack of clarification that the current investigations have provided, my view remains that the only way to provide that essential information is to carry out excavations to the full depth and extent of the three-dimensional excavation envelope, and to properly investigate the air and water movement throughout soil volumes where the trees are rooting.



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