

30<sup>th</sup> August 2018 – OPEN LETTER UPLOADED TO WESTMINSTER CITY COUNCIL  
PLANNING COMMENTS RE: 18/06416/EIASC

Dear WCC Planning,

**RE: United Kingdom Holocaust Memorial - EIA Scoping Report that is on the WCC Planning Website, dated July 2018.**

We note that as a statutory consultee, London Parks and Gardens Trust was not notified.

We note that **most importantly for this site, the 50 mature plane trees framing the view to the Grade I listed Victoria Tower and Houses of Parliament and the potential effects on them due to the 8m underground construction are given scant mention.**

We also note the scoping report **does not include a specific chapter on 'Landscape and Visual Impact'**, but instead includes 'Built Heritage and Townscape', in chapter 6. This is surprising as the site is a public park within a conservation area meaning all the trees are protected. There is only limited mention specifically on the landscape setting of the heritage assets, landscape character, landscape features (which should include trees), landscape policy etc. This is surely an **obvious omission** given the site is a listed landscape and a considerable public amenity as a publicly accessible park for many users at present. We believe it should cover:

- Landscape setting (& of Heritage assets)
- Landscape designation (this is acknowledged but not in detail)
- Landscape features (eg trees) and site character

And the potential effects on all of these, including the trees, and potential cumulative effects - especially given the extent of the root protection areas.

The London Planes are referred to on page 26 (highlighted) but that's all. Reference to trees lining the garden is referred to in section 2.1.

Section 2.2 refers to the proposed excavation to a depth of 8m. There is no mention of tree protection areas.

Finally section 2.2.1 (construction methodology) refers to the installation of tree protection to safeguard retained trees in the Garden **during construction** but does not mention mitigation measures for potential long term effects on them because of construction.

**Chapter 9 - Population and Human Health** gives scant indication of the importance of the open space to local residents and children's play but does mention that it is within an area lacking in informal play space from the City of Westminster Open Space Strategy 2007. No mention as to the potential effect on play/recreation/public health.

Some indication of the impacts that the reduction in open space and change in the nature of that space is provided in **9.3.2**, but is scant to say the least in the sentence 'the new Memorial and Learning Centre will attract a higher number of visitors than at present, and change the way that visitors use the Gardens'.

It does not set out the amount of potential loss of open space and impact on how it operates and functions as a green space and play space, and the subsequent potential effects on the local population and human health. There is no mention of any mitigation of these effects, as there cannot be mitigation for such a loss.

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