



Bartlett Consulting

Date: 28th February 2026
Our Reference: JH.250509.AIA
Your Reference: 320 HMA

Mr. Donncha O'Shea
Gustafson, Porter and Bowman
1 Cobham Mews
London
NW1 9SB

Dear Mr. O'Shea,

Supplementary Arboricultural Impact Assessment for UKHMLC Planning Application 19/00114/FULL

1.0 Introduction

- 1.1 A full Arboricultural Impact Assessment was prepared as part of the original planning application submitted in 2018, supported by extensive on-site investigations which informed design proposals to ensure minimal impact on the existing London Plane trees and their root system(s).
- 1.2 The planning addendum submitted in 2019 further refined the design proposals, in particular the extent and alignment of the basement structure to minimise the impact on existing tree roots. This information was assessed as a Supplementary Impact Assessment to be read in conjunction with the primary planning AIA.
- 1.3 A number of reasonable assumptions were made that time of the original 2018 and supplementary 2019 applications, with respect to the final arrangement of services and drainage associated with the UKHMLC, and their relationship with the trees and tree root protection areas. Since the original planning application and addendum, these elements of the proposed development have been reviewed and modified in design and layout.
- 1.4 I understand the planning application has been reassessed against any changes in planning policy and regulations between the date of the Inspector's Report into the planning application (29 April 2021) and the time of writing this report, which is reported in other planning application documentation.
- 1.5 As a result of the Assurances provided to the House of Lords Select Committee, a number of potential changes have been identified in the DAS Second Addendum comprising the following options:

Unit 22-25, Cross Lane Farm, Cross Lanes, Pill, Bristol, BS20 0JJ
Tel: 01275 371000 (Option 2) consultancy@bartlett.com

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- Option 1A: Hedge Boundary to Playground
- 1.5.1 An additional section of hedging would be introduced along the pedestrian Thames walkway and around the inner line of the Spicer Memorial and the existing railings along Millbank.
- Option 1B: Installation of new gate on Millbank, and full Hedge/Railing Boundary
- 1.5.2 This option would build upon Option 1A by maintaining a fully enclosed playground with a well-defined, 1-metre high, hedge and metal railing. Each entry point into the playground would be gated, including the introduction of a new gate off Millbank. This new dedicated entrance would be clearly signposted, guiding visitors from the street directly to the playground access point.
- Option 1C: Full Hedge/Railing Boundary
- 1.5.3 This option would build upon Option 1A by maintaining a fully enclosed playground with a well-defined, 1-metre high, hedge and railing. Each entry point into the playground would be gated, with a difference to Option 1B being that there would be no new gate entrance from Millbank.
- Option 1D: Removal of Café Kiosk
- 1.5.4 The café and kiosk would be removed, and the space reduced so as to only accommodate essential services— namely the back-up generator and cycle parking. This change would enable the playground area to increase further southward.
- Option 1E: Reorientation of Café Kiosk
- 1.5.5 The counter of the café kiosk would be turned toward the Thames Walkway, to avoid potential queues conflicting with users of the playground adjacent.
- Option 1F: Buxton Memorial Widened Path
- 1.5.6 The path surrounding the Buxton Memorial could be widened by 0.5 metres, providing additional space for visitor circulation.
- 1.6 The House of Lords Select Committee recommendations for amendments would not present any additional constraint on the AIA, or impact on the existing tree roots.
- 1.7 To enable the redetermination of the planning application, the AIA and supplementary arboricultural impact assessment produced in support of the planning application have been reviewed to accord with the latest design information and current regulation and policy. There have been no changes to relevant policy since the initial assessment.

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3.0 Report Author

- 3.1 This letter and supplementary impact assessment have been written by me, Mr. Jason Hasaka. I have a degree in arboriculture, am a Professional Member and Registered Consultant of the Arboricultural Association, and have over twenty-five years' experience in the profession as a climbing arborist; local authority tree officer; and arboricultural consultant – currently the Principal Consultant for Bartlett Consulting | Bartlett Tree Experts.

4.0 Arboricultural Impact Assessment

5.1 Pavillion Courtyard

- 5.1.1 Section 5.3.4 of my original impact assessment had two tables, detailing impacts of the excavation envelope on the known tree root systems. As set out above, the scope of works required for the courtyard has been updated. The updated levels of the excavations required for the Courtyard are shown in Figure 1 & Figure 2 below, and those original assessment tables have been updated accordingly..

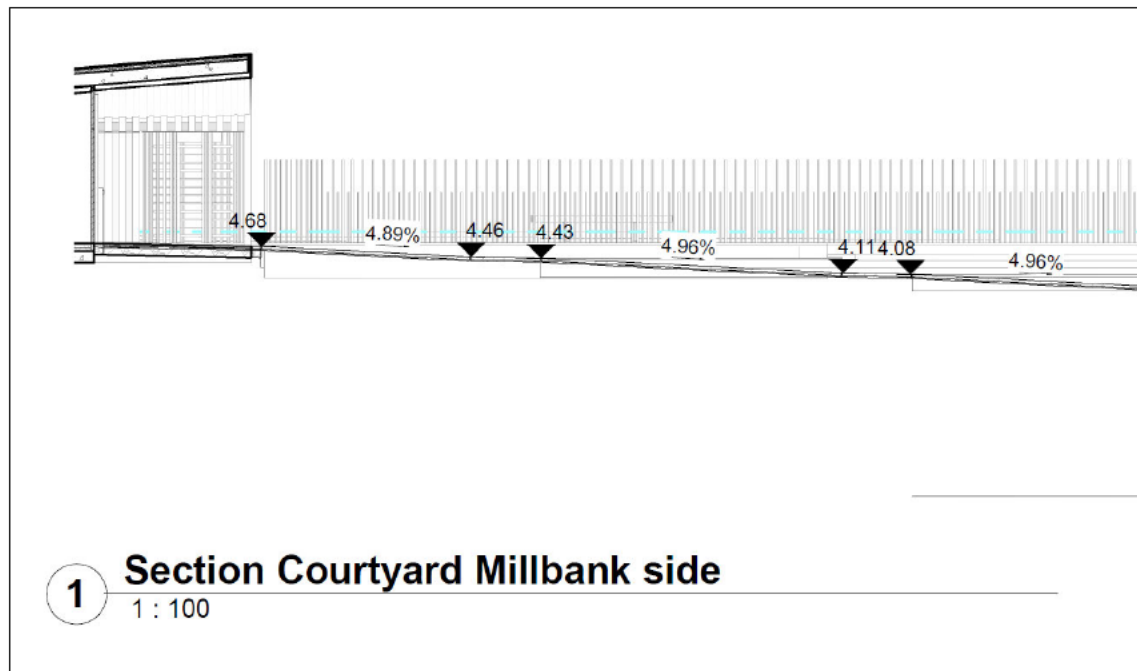


Figure 1: Snipped Image from Courtyard Long Sections Drawing

Tree Ref	Root Ref	Diameter & Depth	Aspect of Memorial	Implications
T71022	R25	50 mm 900 mm	Entrance Pavilion	Pruned during excavations (no change from original application)
T71021	R24 – R22	40 mm – 30 mm 900 mm – 1.0 metre	Entrance Pavilion	- Retained 100 – 300 millimetre excavation for foundations - Above existing roots - No pruning or direct damage anticipated (no change from original application)
T71020	R21 – R19	60 mm – 20 mm 800 mm – 900 mm	Pavilion Courtyard	- Retained - Sloping courtyard 2^o gradient 300 – 500 millimetre cut for levels - Proposed changes to incorporate roots - Root R19 dead at time of investigation (no change from original application)
T71019	R18 - R16	15 mm – 40 mm 800 mm – 1.0 metre	Pavilion Courtyard	- To Be Retained - Sloping courtyard 2^o gradient 300 – 600 millimetre cut for levels anticipated - Proposed change to incorporate roots (no change from original application)

5.0 Arboricultural Impact Assessment (continued...)

5.1 Pavillion Courtyard (continued...)

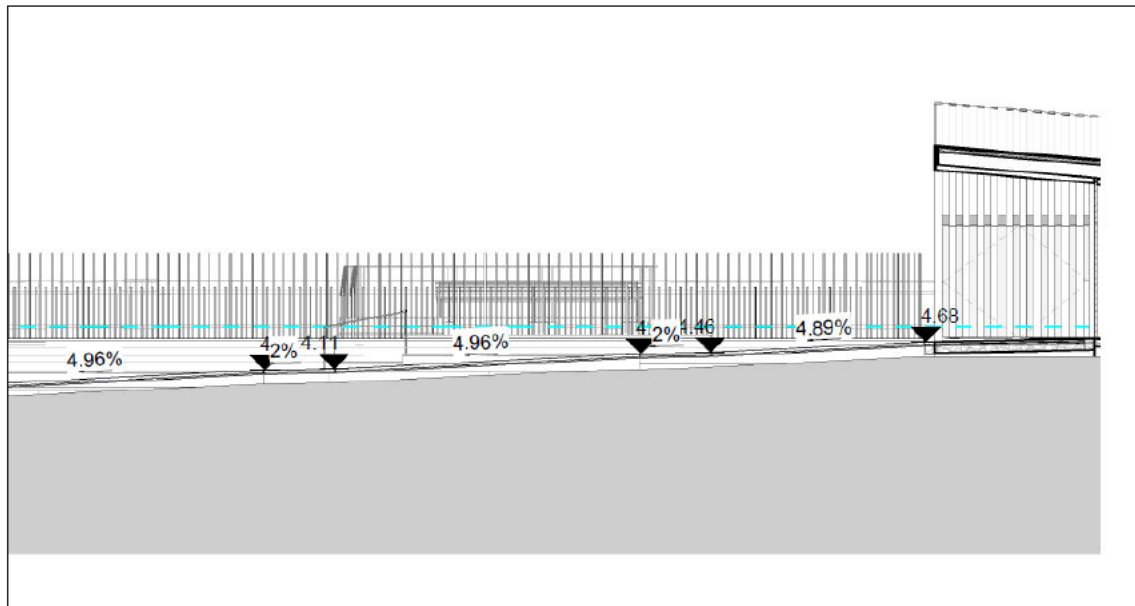


Figure 2: Snipped Image from Courtyard Long Sections Drawing Showing Thames River Elevation

Tree Ref	Root Ref	Diameter & Depth	Aspect of Memorial	Implications
T70006	R26 – R27	· 50 mm – 20 mm · 400 mm – 600 mm	· Pavilion Courtyard	· Sloping courtyard 2 ^o gradient · 300 – 500 millimetre cut for levels · Root 26 likely need to be pruned · Root 27 likely retained (change from original application)
T70007	R28	· 30 mm · 1.0 metre	· Pavilion Courtyard	Retained · Shallow building foundations above roots · No pruning or direct damage (no change from original application)
T70008	R29 – R30	· 35 mm – 40 mm · 700 mm	· Pavilion Courtyard Basement Box	· Pruning required to facilitate development (no change from original application)

5.1.3 Further to this detailed study and review, there are two material changes from the original application:

- pruning of root R26 as a result of excavations required for the courtyard
- pruning of root R28 as a result of excavations required for the courtyard

5.1.4 Impacts of root pruning have been addressed in the original & supplementary impact assessments; and based on the above review, those impacts will remain the same.

5.1.5 As per the original impact assessment, and confirmed by the project engineer at the time of writing this report, drainage and construction of the pavilion courtyard will look at ways to ensure rainwater filters through to the soil and rooting environment below, as well continued gaseous exchange to the soil for continued root growth and development; and pruned roots and the trees will be subject to compensation & mitigation.

5.0 Arboricultural Impact Assessment (continued...)

5.2 Crown Spread & Facilitation Pruning

- 5.2.1 The original impact assessment and planning application identified site access between trees T71025 & 71026, as well as 71010 and T71009. These proposals remain the same.
- 5.2.2 The proposed Holocaust Memorial fins have been sited not to conflict with tree canopies, provided that the trees remained managed by Royal Parks in-line with established and pre-existing management.
- 5.2.3 The original impact assessment informed that along the **eastern aspect** of the UKHMLC, the Holocaust Memorial fins sited under the tree canopies will not exceed 3.7 metres height to maintain clearance; whilst along the **western aspect**, Holocaust Memorial fins range from 3 – 9.7 metres height.
- 5.2.4 The table below reviews tree crown dimensions, spatial relationships, and facilitation pruning:

Tree Ref. devel. component	Crown Dims (2018) spread N/E/S/W low canopy	Crown Dims (2025) spread N/E/S/W low canopy	Pruning (2018)	Pruning (2025)
71009 access	8 / 16 / 11 / 12 5.0 – east	9.5 / 15.5 / 8.5 / 14 5.0 – east	· Lift East & South to 5.5 Metres	· No Update Required
71010 access & fins	11 / 14 / 10 / 13 4.0 – east	11.5 / 15 / 10 / 14 4.5 – east	· Lift East & South to 5.5 Metres	· No Update Required
71013 fins	11 / 14 / 10 / 10 7.0 – east	13.5 / 15 / 11.5 / 14 6.5 – east	· Lift East to 8 Metres	· Lift East to 8 Metres · Reduce East by 1 Metre
71014 fins	9 / 13 / 10 / 10 7.0 – east	10 / 16 / 10 / 12 7.0 – east	· Lift East to 8 Metres	· Lift East to 8 Metres · Reduce East by 2 Metres
71015 fins	8 / 13 / 11 / 10 7.0 – east	9 / 11.5 / 11.5 / 12 7.0 – east	· Lift East to 8 Metres	· No Update Required
71016 fins	9 / 13 / 9 / 10 5.0 – east	10.5 / 12 / 9 / 12 5.0 – east	· Lift East to 8 Metres	· No Update Required
71017 fins	12 / 13 / 10 / 10 7.0 – east	10.5 / 11.5 / 11 / 12 6.5 – east	· Lift East to 8 Metres	· No Update Required
71025 access	7 / 14 / 9 / 11 7.0 – east	8 / 12.5 / 9 / 12 11.0 – east	· Lift East & South to 5.5 Metres	· No Update Required
71026 access	8 / 14 / 13 / 11 8.0 – east	9.5 / 12 / 15 / 12 7.5 – east	· Lift East & North to 5.5 Metres	· No Update Required
70011 fins	8 / 10 / 6 / 12 5.0 – west	8 / 12 / 7 / 12 5.5 – west	· Lift West to 6 Metres	· Lift West to 6 Metres · Reduce West by 1 Metre
70012 fins	10 / 10 / 12 / 14 7.0 – west	10.5 / 12 / 10 / 12 7.0 – west	· Lift West to 7 Metres	· No Update Required

- 5.2.5 Three trees, T71013, T71014 and T70011 have grown in spread since the original survey, which may conflict with the proposed fins. Therefore, lateral branch reduction for these trees will be required to bring them back to the 2018 dimensions. This was previously advised as acceptable to the form and species of tree without causing harm.
- 5.2.6 The pruning requirements will be reviewed again prior to construction, during the preparation of the Arboricultural Method Statement, with regards to lifting, positioning and final installation of the Holocaust Memorial fins.

5.0 Arboricultural Impact Assessment (continued...)

5.3 Review of Services

- 5.3.1 Through consultation and discussion with WSP & Gustafson Porter & Bowman, services and associated ducting have been reviewed and rationalised, reducing the number of proposed service runs through and adjacent to tree root protection areas, as well as the wider landscape.
- 5.3.2 Proposed development and hard landscaping has also been reviewed and amended to maintain water percolation and gaseous exchange to soil and roots below the courtyard and entrance pavilion, as per the original impact assessments.
- 5.3.3 With regards to drawing UKHM.WSP.ZZ.ZZ.DR.DR.900102, Revision P02, although service runs and corresponding inspection chambers are proposed and sited within the root protection area and known rooting location, they are broadly below the roots.
- 5.3.4 Final layout and siting of services will need to be guided and informed by supplementary investigations detailed as part of the arboricultural method statement; and installation methods including trenchless techniques such as thrust-boring and / or impact-moling will need to be specified to prevent root damage and severance.
- 5.3.5 Similarly, any improvements and updates to existing services will need to be detailed within the arboricultural method statement, including excavations and working methods.
- 5.3.6 With regards to drawing UKHM.WSP.ZZ.ZZ.DR.DR.900101, the proposed soakaway tank has been moved outside the notional root protection area and known rooting zone.
- 5.3.7 With regards to the same drawing UKHM.WSP.ZZ.ZZ.DR.DR.900101, proposed service runs are currently sited and trespassing through the root protection area and knowing rooting locations. As stated above, final positioning and location of these runs will need to be determined and finalised following supplementary investigations detailed as part of the arboricultural method statement.
- 5.3.8 It is my professional recommendation that service runs are shared to minimised intrusion and working within the rooting environment; with final working methodologies to be detailed in the arboricultural method statement.

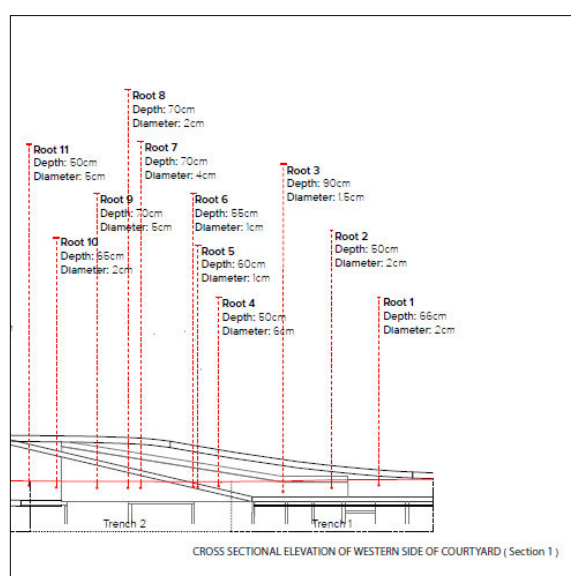


Figure 3: Snipped Image from Root Investigations Showing Location, Depth and Diameter of Roots

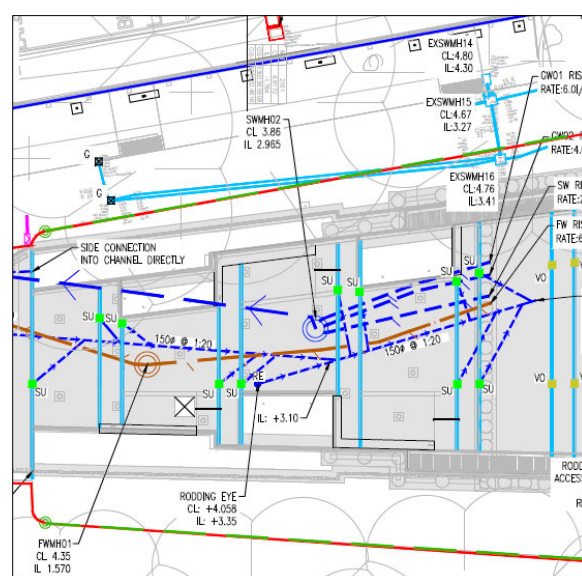
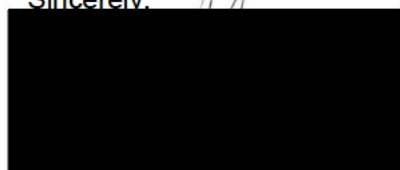


Figure 4: Snipped Image from Service Plan Highlighting Overlap and Trespass with Known Rooting Locations

6.0 Conclusions

- 6.1 At the conclusion of my review of the updated design for the entrance pavilion and courtyard, two additional roots will need to be pruned, which will be addressed through already specified and detailed tree health care and soil amelioration.
- 6.2 In addition, crown lifting of three additional trees due to continued canopy growth since the original survey, impact assessment and planning application will be necessary for installation of the memorial fins. This pruning will not harm the form or physiological condition of the trees, and on balance, is reasonable and proportionate.
- 6.3 After my review of the proposed service plans, there has been positive progress in rationalisation and siting of the drains, runs and inspection chambers. However, there remains some overlap and conflict which will need to be finalised through supplementary investigations and modification of design and layout, detailed as part of the future main contractor's arboricultural method statement.
- 6.4 The main contractor's arboricultural method statement will also need to detail sympathetic working and installation methods, as well as supervision and monitoring by a suitably qualified arboriculturist.

Sincerely,



Jason Hasaka *HND Arb MArborA RCArborA*
Principal Arboricultural Consultant

