

Mr. D Dorward  
South Planning Team  
Westminster City Council  
64 Victoria Street  
London SW1E 6QP

15<sup>th</sup> February 2019

Dear Mr. Dorward

**19/00114/FULL  
INSTALLATION OF THE UNITED KINGDOM HOLOCAUST MEMORIAL AND  
LEARNING CENTRE, THE VICTORIA TOWER GARDENS, MILLBANK  
LONDON SW1P 3YB**

ICOMOS-UK wishes to object to this proposal to install a Holocaust Memorial at Victoria Tower Gardens, Millbank within the setting of The Palace of Westminster and Westminster Abbey including St Margaret's Church World Heritage Site (Westminster WHS).

ICOMOS-UK is the UK National Committee of ICOMOS, which has a special role as the official adviser to UNESCO on cultural World Heritage Sites. ICOMOS-UK plays a leading role in helping to implement the 1972 World Heritage Convention (the Convention) within the UK and promoting best practice in the management of UK WHSs. The maintenance of the Outstanding Universal Value (OUV) of the UK WHSs and their settings is a key objective.

We fully support the principle of creating a new Holocaust Memorial in the UK but consider that the proposed location in the immediate setting of the Westminster WHS would cause substantial harm to the way the setting supports and protects the OUV of the WHS.

Westminster WHS was inscribed on the World Heritage list in 1987 not only for the way its architecture and art represent a striking sequence of successive phases of English Gothic art and architecture, and includes an outstanding example of Neo-Gothic architecture, but also as a symbol of the intertwined history of monarchy, church and state since the 11<sup>th</sup> century, and the development of parliamentary democracy.

The Statement of Outstanding Universal Value (SoOUV), adopted by the UNESCO World Heritage Committee in 2013 to encapsulate why the WHS justified inscription on the World Heritage List, emphasizes ‘the instantly recognizable location and setting of the property in the centre of London, next to the River Thames’ as ‘an essential part of the property’s importance’.

### *The Setting of the WHS*

The boundaries of the WHS are drawn quite tightly around the main monuments. To allow the monumental ensemble to convey fully its meaning through reflecting its sheer size and intended dominance, brings the need for protection of its setting. This includes its immediate and wider setting, the prominence of its skyline, and key views into, within and out of the WHS, all of which relate to its integrity and authenticity. The setting is not part of the WHS but is ‘functionally important as a support to the property and its protection necessary support to its OUV’, as set out in the *Operational Guidelines for the Implementation of the World Heritage Convention, 2016*<sup>1</sup>, paragraphs 104 and 112. This connection is clearly acknowledged in the Design and Access Statement, Project Context Part 2, Section 2.5 which states that: ‘Although outside of the WHS, Victoria Tower Gardens nonetheless makes an important contribution to the outstanding universal value of the WHS’.

Such a definition of setting is also in line with that of the National Planning Policy Framework (NPPF) published in July 2018<sup>2</sup>. Setting is there seen as ‘The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral’. This is reinforced in the Mayor of London’s new Draft London Plan, Chapter 7 Policy HC2 para 7.2.3 which states that ‘The **setting of London’s World Heritage Sites** consists of the surroundings in which they are experienced, and is recognised as fundamentally contributing to the appreciation of a World Heritage Site’s Outstanding Universal Value. Changes to the setting can have either an adverse or beneficial impact on the ability to appreciate the site’s Outstanding Universal Value’. Policy HC Section B also states that ‘Development proposals in World Heritage Sites and their **settings**, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value, including the authenticity, integrity and significance of their attributes, and support their management and protection.

Victoria Tower Gardens bordering the Thames form part of the immediate setting of the Westminster WHS. The quiet open space allows a striking view of Victoria Tower from within the Gardens framed by two formal lines of trees – mostly planes – planted in the early 1900s. And, indeed the gardens were redesigned and simplified in 1933 and gained their present appearance in the 1950s, precisely to give a clear and uncluttered view of both the Tower and the south side of the Palace. These Gardens are the only place in the immediate

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<sup>1</sup> WHC.16/01 26 October 2016

<sup>2</sup> Cm 9680

surroundings of the Palace where it is possible to get an uninterrupted view the Tower in a tranquil open setting unencumbered by traffic, street furniture, and the noise and general clutter of a major urban center and tourist destination.. The three existing memorials are subservient to the overall park and to the overlooking monumental elevations of the Palace of Westminster.

### *Impact of proposal on the immediate setting*

The installation of the proposed Holocaust Memorial and Learning Centre in the Victoria Tower Gardens would interrupt substantially the key view of the Tower and Palace and fundamentally compromise part of the immediate setting of the Palace of Westminster through confusing and detracting from the way the Westminster WHS is experienced. The current plans would result in the Gardens being dominated by the memorial, its bulky entrance pavilion, enclosed forecourt and hard landscaping, as well as the forecast one million visitors a year. In essence, the proposed memorial would challenge rather than complement the Gardens both visually and perceptually.

Visually, the vertical fins of the new structure would obscure the lower half of the tower while the obtrusive sinuous diagonal path with its hard surface and kerb crossing the remaining open northern part of the Gardens would cut across the classic formality of the present view. Perceptually, the proposed memorial would convey a completely different message and value from the WHS: the two would compete for space. As the architect has said ‘disrupting’ the pleasure of being in the current park is part of his design concept: the memorial will not only physically dominate its surrounding and but also its meaning. Such an intervention would negate the present two compatible roles of the Gardens which are to offer quiet relaxation and support for the OUV of the Westminster WHS.

### *Impact on OUV*

As the immediate setting of a WHS supports its OUV, and its protection is thus necessary for sustaining OUV, we consider that it is crucial to assess the potential impact of the current proposals on this supportive role.

Although an Environmental Statement (ES) has been undertaken and this includes impact on cultural heritage, no Heritage Impact Assessment has been carried out in line with *ICOMOS Guidelines on Heritage Impact Assessment for Cultural World Heritage properties*<sup>3</sup>, as is recommended by the UNESCO World Heritage Committee for projects that might impact on OUV. It is stated that the ES has ‘had regard to the ICOMOS Guidance’ (para 12.29) but it has not fulfilled the purpose of an Heritage Impact Assessment which is to consider potential impact on all aspects of OUV, not just visual and physical aspects but also the ability of a

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<sup>3</sup> Guidance on Heritage Impact Assessments for Cultural World Heritage Properties A publication of the International Council on Monuments and Sites, January 2011

property to project its value. The ES has not set out a full set of all the attributes that convey OUV, as a basis of assessing impact, and thus has not considered important associations. In its visual assessment of View 22, the view of Victoria Tower from across the lawns of the Gardens, the ES concludes that the potential change to this view towards the WHS would be ‘high’ in terms of the way the memorial would block views of the lower half of the Tower, but counter-intuitively suggests that the ‘Proposed Development would give rise to a Moderate Beneficial effect to visual receptors’ We do not accept that the raised grassy viewing area- impractical as it would be if used by the predicted one million visitors – would be a satisfactory replacement for the loss of the current views of the Tower within the Gardens.

As acknowledged in the SoOUV, the Palace is an outstanding example of neo-Gothic architecture with the Victoria Tower being a crucial element of its skyline, signifying the power of the institutions within. Any diminution in the way the whole Tower is perceived and viewed reduces its powerful impact and demeans its status as a symbol of democratic systems. Had a full HIA been undertaken, it would surely have considered all the attributes that convey OUV, including the symbolism of the buildings, their associations and the way they are perceived, and not just views.

The ES also assesses views from across the river and considers that there will be little visual impact. We agree that this is the case as long as the tree screen survives. However, on the basis of expert advice received, we understand that the level of likely disruption caused by the installation of the memorial and the fact that the roots of the two lines of trees are already been constrained on one side, either by the road or the river, means that their chances of survival are not considered to be high. Without a screen of trees, the proposed new building would have a massive visual impact that would expand beyond the main view of the Tower.

The conclusion in Part 3 of the ES on the direct and indirect impacts on the WHS is brief (12.29 – 12.35). It is confined to stating that ‘the open character of the northern part of the Park would be preserved’ and that although views of Victoria Tower and associated parts of the Palace would be curtailed, the ‘above ground elements of the NHM have been designed to positively respond, and be subservient to, the House of Parliament, while ‘visitors to the park will be able to appreciate the form of the Victoria Tower from a new, elevated perspective, creating an interesting new viewing position’.

We cannot support this conclusion, given the highly negative impact the proposals would have on the main view of Victoria Tower and the fact that the wider symbolic associations and meaning have not been taken into account, both of which in our view would be impacted adversely.

#### *Consultations on the choice of site*

The Westminster WHS is managed through a Coordinating Committee, known as the Westminster WHS Steering Group, that brings together the key stakeholders for the property.

The Management Plan for the property, approved by this Committee, was published in 2007 and encompasses both the property and its setting. It is disappointing that this Committee, whose terms of reference include ‘to receive and provide comment on reports from responsible bodies and agencies regarding projects which affect the WHS’ including ‘major development and public realm proposals’, was not consulted on the choice of site for this memorial, and furthermore that local communities and other interested networks were also not consulted. UNESCO places a high premium on collaborative working and an inclusive approach, as recommended in the *Operational Guidelines*.

### *Conclusions*

I would reiterate that ICOMOS-UK, in principle, supports the creation of a national memorial for the Holocaust; what we cannot support is its siting in Victoria Tower Gardens. For the reasoning set out above, we consider that the proposed Memorial and its underground Learning Centre would cause substantial harm to Victoria Tower Gardens, and to their contribution to the setting of the WHS and support for its OUV.

Just as the WHS needs a setting to allow a full understanding of its value, so, too, in our view, does a memorial to the Holocaust, in order to ensure there is space for quiet contemplation, not confused with other uses and messages. Such a space of reflection could not be achieved for a memorial squeezed into the confines of Victoria Tower Gardens.

For both these reasons, we urge the Planning Committee not to support this application. Such a decision could pave the way for open and inclusive discussions on where a national memorial to the Holocaust might be sited that would enable it both to prompt memories and inspire profound reflections, away from the setting of the Westminster WHS which deserves the highest protection that can be afforded. We note that as set out in Article 4 of the World Heritage Convention, it is the responsibility of a State Party to this Convention to transmit to future generations inscribed WHSs (which it has nominated voluntarily) through doing all it can, to the utmost of its resources, to ensure effective protection measures are in place.

As the proposed memorial was mentioned to the ICOMOS/ICCROM Reactive Monitoring Mission that visited the WHS in February 2017 during the early stages of the planning process, this letter is copied to ICOMOS, Paris, for information.

Yours sincerely

**Peter Marsden**  
**Chair, ICOMOS-UK World Heritage Committee**

cc Regina Durighello, ICOMOS, Paris