Dear Mr Dorward,

Ref: 19/00114/FULL - Installation of the United Kingdom Holocaust Memorial and Learning Centre

We write as the Planning & Conservation Working Group of the London Parks & Gardens Trust (LPGT). The LPGT is affiliated to The Gardens Trust (TGT, formerly the Garden History Society and the Association of Gardens Trusts), which is a statutory consultee in respect of planning proposals affecting sites included in the Historic England Register of Parks and Gardens of Special Historic Interest. Inclusion of a site on the HE Register is a material consideration in determining a planning application. The LPGT is the gardens trust for Greater London and makes observations on behalf of TGT in respect of registered sites, and may also comment on planning matters affecting other parks, gardens and green open spaces, especially when included in the London Inventory (see www.londongardensonline.org.uk) and/or when included in the Greater London Historic Environment Record (HER).

This application proposes to irreversibly change the character of the grade II registered Victoria Tower Gardens, originally created and designed for unrestricted public access and recreation, with the proposals for above and underground buildings (only accessible by prior booking), barriers, memorial and landforms.

Summary of key heritage, social and ecological significance

Victoria Tower Gardens is a significant historic landscape of national importance in its own right, as well as providing the setting for grade I, II*, and II listed buildings and monuments. The key historic significance of the landscape lies in the following:

- its creation as a unified garden as a result of the embankment of the Thames in response to pollution of the river
- its archaeological potential to reveal more of the area’s development as an area at the centre of the country’s most historic events
- its provision for the use of the public as a philanthropic act to be maintained as a public garden and play space, reflecting the increased understanding of the importance of such provision for all in a densely populated city
- its philanthropic development as a playground for local children in the C19 reflecting the contemporary development of recognition of the importance of play, particularly for those with a lack of access to such amenity
• its simple design aesthetic affording long views to the internationally recognised buildings of the Palace of Westminster, framed by London Plane trees, some of which are the original plantings, and open expanse for recreation

• the chosen open setting for monuments to slavery, emancipation and heroism, with the symbolic juxtaposition of Parliament, accessible and open to all

• its continued use by the public since its creation for national celebrations and gatherings, including marking royal events.

The Garden’s key social and ecological significance lies in the following:

• its importance as a valued open space for access to nature, recreation and relaxation as refuge from the noise and frenetic activity of the nearby major tourist areas, both for visitors and local residents and workers

• its amenity provision in an area with very limited access to open space and nature

• its potential as wildlife habitat, providing cover and food in a wildlife corridor in a very heavily urbanised area

• its mature tree growth mitigating air pollution and psychological effects of noise, particularly given the characteristics of the London Plane.

These significances are recognised by the numerous national historic and landscape designations contained in the Historic England Register of Parks and Gardens and listed buildings.

LPGT’s Reasons for Objection

LPGT objects to the application for a number of reasons. We do so on the basis that, in accordance with NPPF, many of the Gardens’ heritage values, along with the setting of listed and unlisted monuments provided by the Gardens, will be substantially harmed. The proposals are also contrary to WCC’s planning policy regarding Conservation areas, green space and historic landscapes. We believe the choice of sites to be fundamentally wrong, and politically rather than policy-led, without reference to normal planning considerations.

The following sets out our key objections:

1. Omissions in the applicant’s understanding of the Gardens’ Heritage Values and original design intent

In accordance with NPPF para 189, the applicant has submitted their understanding of the heritage asset. We find there are serious omissions in the applicant’s chronology of the site’s history, and significance statement for the Gardens. This demonstrates a lack of understanding about the design intent for the Gardens, its heritage values (as defined by Historic England) and therefore its significance, as follows:

1.1 The applicant’s proposal regarding Piecemeal Development :{(VOLUME_3_HTVIA_PART1-5782097, pg 5) states that the Gardens ‘developed piecemeal over an extended period, and the Proposed Development provides an opportunity to consider the space therein as a whole’.

LPGT response: This statement suggests that the Gardens have never been designed or considered as a ‘whole’ in the past, which is evidentially incorrect. The Gardens have been laid out to designed
plans in two distinct design periods, the latter which still exists today, after an initial concept of a unified, uncluttered lawn, suggested by Charles Barry in 1857. The applicant has omitted to include the 1949 plan (Ministry of Works File Work 16/826) also contained in Section 4 of LPGT’s ‘VTG Conservation and Statement of Significance Plan’, sent to WCC, with this letter. The existing layout was designed by placing each memorial or sculpture in careful locations (on axis, at the entrance, in the foreground) and opening up the space so each of them relates directly to Parliament and enables free circulation around them. The common theme of both design periods was to enable open views to Parliament and to create a space for use as a garden and recreational play space as well as the setting for each significant structure and long views to Parliament.

1.2 The applicant’s proposal (VOLUME_3_HTVIA_PART1-5782097, pg 4) states of the Buxton Memorial: ‘Its location close to Parliament contributes to its historic interest, though appreciation of the monument’s purpose is limited by its placement at the convergence of footpaths, which inadvertently places the memorial as the central feature of a pedestrian traffic island’

LPGT response: The 1949 plan (publicly available: Ministry of Works File Work 16/826) shown in our Conservation and Significance Statement, clearly shows that the current scheme was designed carefully to place the Buxton Memorial on axis with the (grade I) church of St John the Evangelist, along Dean Stanley Street, as well as being visible to and from Parliament. The approved Paper laid before Parliament in 1940 states ‘The fountain is in the nineteenth century Gothic style which could not successfully be conjoined to the more simple style of the present layout of the [Parliament] Square…. It is desirable however that this memorial of an act outstanding in the annals of Parliament should not be far removed from the scene of Parliament; it should be located at the river end of the footpath, which continues the line of Dean Stanley St. …. Agreed with the Anti-Slavery Society and Royal Fine Art Commission.’ (All references Works file 16/1940-1).

The Historic England Register entry for the Gardens states that ‘... the central area of the gardens is laid out as open lawn, kept clear of planting to preserve the views.’

The applicant’s statement about the location of the Buxton Memorial clearly demonstrates a lack of understanding about its placement, by suggesting it was placed accidentally, rather than as a deliberate design decision. Its dismissive comments and conclusions about its obscuration from view by proposed landform, and the proximity of ‘fins’ show a lack of sensitivity to the physical form and the cause for which it was created. In light of the need for the 2015 Modern Day Slavery Act, this misunderstanding of its significance is all the more poignant.

2.0. Area of green space lost: While the applicant’s proposal takes up 7% of the total park area with above ground buildings and the fenced, inaccessible plaza/ramp into the learning centre, the development actually reduces the open, usable, accessible, recreational garden space by 26%, with the additional hard standing, service access and access paths. See our plan (LPGT Plan 3) for area calculations. The Garden was designed so the whole space would be used as a public garden for public recreation, not a civic space (of appropriately sombre and respectful tone) with ticket and security buildings, barriers, hedges and hard standing.

The 1900’s Act states that the Government (the Commissioners of Works) and Westminster Council agreed the landscape design plan, with LCC contributing some of the land and a contribution of £100,000 towards the Millbank scheme in 1900 on condition that, as regards the land between Millbank and the river (now the southern part of the Gardens), “the lands... between the new [Millbank] street and the new embankment wall shall be laid out and maintained ... [and] provided
for use as a garden open to the public and as an integral part of the existing Victoria Tower Garden”.

This is the scheme that was carried out to create a single unified open space out of several separate pieces of land, and we suggest that a civic building does not constitute use as a public garden.

3.0. Substantial harm done to the many values of the Gardens

The applicant states (VOLUME_3_HTVIA_PART1-5782097, pg 6) ‘Given the limited area of impact, and the high quality of the Proposed Development, we conclude that any harm arising to the RPG is very limited, and less than substantial in terms of the NPPF, and would have to be balanced against the heritage benefits outlined above.’

LPGT response: The collective significance of the Gardens, as described in our Conservation and Significance Statement (LPGT January 2019), will be substantially harmed if the scheme is permitted. The Gardens will no longer wholly function as an open garden and will become, for the large part, a civic paved space. The following values (not identified in the applicants HIA) will be substantially harmed. We do not agree with the applicant’s claim of ‘heritage benefits’ created by the proposals and do not believe that they have set out a strong case that demonstrates these benefits or justifies the harm, as required by NPPF. Rather there will be obscuration of views by the landform and scale of the monument, paths close up against trees, and constriction of existing spatial quality of the Gardens created by the ‘fins’ and other structures. There is no explicit basis for this claim of ‘heritage benefits’ created by the scheme.

3.1 The Values of the Gardens, and the harm that will subsequently be done if the application is approved are set out as follows:

<table>
<thead>
<tr>
<th>Aesthetic Values</th>
<th>Harm</th>
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<tbody>
<tr>
<td>The openness of the Gardens as achieved by the 1949 design, with the view framed by the mature London Planes planted after the 1900s Act, flanking the simple plane of grass, and designed locations of monuments provide the setting and frames the long view to the Grade I Victoria Tower from the whole lawn, play area and Lambeth Bridge.</td>
<td>Views, space and access lost to the public garden from the southern end, constitutes substantial harm.</td>
</tr>
<tr>
<td>The open setting of Buxton memorial (grade II*), placed as such because of the nature of its highly ornamented gothic architecture, and relationship with Parliament and on axis with the Church.</td>
<td>Changed setting, obscuration of views and access; this constitutes substantial harm</td>
</tr>
<tr>
<td>Spacious play provision, both formal (play area) and informal (grass) recreation.</td>
<td>Considerably reduced, therefore constituting substantial harm. Formal play area reduced by 167m² due to the encroachment of the HMLC. Open space (ie open grass/recreational space) reduced by 26% overall. Refer measured areas plan attached, (ref LPGT Plan 3).</td>
</tr>
<tr>
<td>Visual calm and tranquillity afforded by trees, flanking and framing the open lawn and key views.</td>
<td>Trees threatened, by excavation within RPA’s and pruning to canopies. Likelihood of harm substantiated by lack of detail in the Arboricultural information/AIA submitted, which does not show adequate root protection</td>
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area (RPA) on lawn side, or sufficient survey of likely deep rooting depth. Once excavation is underway, harm will have been done if deep anchor roots are found, which is likely due to poor soil. Any noticeable dieback or loss of trees will constitute **substantial harm**.

<table>
<thead>
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<th>Historic Values</th>
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<tr>
<td>The location of the grade II* Buxton monument, moved from Parliament Square due to its complex gothic form and need for space, on axis with Dean Stanley St. ‘The significance of the [Buxton] monument is enhanced by its location; it commemorates one of Parliament’s most momentous Acts, and its principal dedicatee is the parliamentarian responsible for ensuring the passage of that Act’</td>
<td>Its setting, form and space will undoubtedly be obscured, as shown in the applicant’s visualisation. – especially poignant in light of the necessity for the recent, 2015, Modern Slavery Act, which seems to disregard its importance. We believe this constitutes <strong>substantial harm</strong>.</td>
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<td>The creation of the Gardens were enabled by the creation of the Embankment, in response partially to combatting the pollution of the Thames in the ‘Great Stink in 1858.’ Open space and respite from pollution today is a reminder of the need for uncluttered, accessible open space for all Londoners.</td>
<td><strong>Significant harm</strong> to the open space, and pollution increased with increased vehicle movements and coach waiting.</td>
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<tr>
<td>Views to grade I &amp; II* monuments (illustrative, associative and communal values.) Views will be severely restricted from the south, and axial designed views to the Buxton monument from the west restricted.</td>
<td><strong>Substantial Harm.</strong> As demonstrated by the applicants own photomontages, due to both the scale and location of the proposals in close proximity to the monuments and interrupting views.</td>
</tr>
<tr>
<td>Political and other rallies attracting tens of thousands of people have used VTG continuously since its creation as an end point and venue for speeches, as it offers the key large space associated with Parliament and democracy</td>
<td><strong>Substantial Harm</strong> – space will be less able (by 26% publicly accessible space reduction) to host public events and continue this contribution to democracy.</td>
</tr>
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<td>Play (associative value) The Gardens have references to one of the earliest London play areas, specifically designed for the local children in the many dwellings with no access to gardens – the same need remains today.</td>
<td>The proposals mean the Spicer monument (curved stone wall and unlisted heritage asset) is moved c.10m south, encroaching into the play area. This means the play area is considerably reduced in size and with a public café in the play space that will be used by HMLC visitors walking through it. The formal play area will be reduced by 167m2 (not including café) and Open space (ie open grass/recreational space) reduced by 26% overall. Refer LPGT measured areas plan attached. This constitutes <strong>substantial harm.</strong></td>
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<tr>
<th>Communal Values</th>
<th>Harm</th>
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<tbody>
<tr>
<td>As well as public rallies attracting tens of thousands of people, (see above) the Gardens have played host to events and significant</td>
<td><strong>Substantial Harm</strong> – space will be less able (by 26% publicly accessible space reduction) to host public events.</td>
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ceremonial events that have national, regional and community significance. From queues occupying the whole Gardens waiting to see Churchill’s lying in state, to New Year’s Eve celebrations, to big screens and national rallies.

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<th>Elements contributing to the other Values described above:</th>
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<tr>
<td><strong>Trees</strong></td>
<td><strong>Harm</strong></td>
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<td>Applicants propose that the conditions for trees will be improved in some parts of their applications, and admits in other sections, that it is likely that there will be ‘tip dieback’ and root-pruning in others.</td>
<td>Considerable harm to trees is highly possible. This would constitute <strong>substantial harm</strong> to all the ‘values’ of the Gardens as mentioned above. This conclusion is based on the following, as observed by qualified arboriculturalists:</td>
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<td>These are not mentioned in the HTVIA, despite comments on the planning application for the scooping report specifically requesting this to be included.</td>
<td>In brief:</td>
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<td>• There is no Arboricultural Method Statement (AMS) submitted.</td>
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<td>• RPA’s are not reflective of site conditions (poor soil, hard boundaries in river wall and road).</td>
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<td>• The standard according to NJUG for cutting roots says no roots over 25mm shall be cut, but the applicant says that roots of 60, 90 and 100mm are present (from their surveys) and will be cut. 15 trees will be root pruned, with no admission of the risk of disease from pathogens as a result, although there is an ‘admission of risk of dieback’.</td>
<td></td>
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<tr>
<td>By allowing this application with insufficient exploration into deep rooting potential, harm is likely to occur if anchor roots are encountered during construction. In such case, they will necessarily need to be severed to enable construction to progress. Any loss to trees or loss of vigour would constitute <strong>substantial harm</strong> to the Gardens as a whole.</td>
<td></td>
</tr>
<tr>
<td><strong>Archaeology</strong></td>
<td><strong>Harm</strong></td>
</tr>
<tr>
<td>The Park sits within the Westminster Abbey and Parliament Square Conservation Area with the northern end of the site included in the Area of Special Archaeological Priority (APA) From the APA: ‘Relevance to the outstanding universal value of the World Heritage Site could indicate international significance. In these circumstances a strong emphasis is placed on minimising disturbance to achieve preservation in situ.’</td>
<td><strong>Harm</strong> will clearly be done. Although archaeology will be well documented, so could be construed as <strong>less than substantial harm</strong>.</td>
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4.0 Comment on the Proposals Contravention to WCCs Green Space and other Planning Policies:

4.1 WCC Policy S35 Open Space: states that it ‘will protect and enhance Westminster’s open space network, and work to develop further connections between open spaces. The council will seek to address existing public open space deficiencies, including active play space deficiency, and current and future open space needs...

LPGT response: The HMLC proposals are clearly in contravention of this.

4.2 WCC Conservation Areas: The character of the conservation areas including its trees are protected, and all trees are protected if each had an individual TPO.

LPGT response: The HMLC proposals are clearly in contravention of this, due to the harm mentioned in 1-3 above.

4.3 Westminster City Council Ward Profiles 2018: Show the high levels of obesity 28% & 30% of 6 yr olds in the relevant wards, as well as high percentages of dwellings with little or no access to private gardens space. 26% of the children receive free school meals, an indicator of financial stress. 20% of the ward are vulnerable older people.

LPGT response: It is accepted that access to open space contributes to combatting obesity, loneliness, as well as having positive contribution to health and well-being generally. By turning VTG into a civic memorial space, attracting over 1m visitors per year, its use as a local park will be diminished, contrary to WCC policy.

Open Spaces Strategy 2018 and 2007
‘The City Council reflects the aims of the Mayor’s London Plan in its own planning policy, with a clear strategic objective within Westminster’s City Plan to: “protect and enhance Westminster’s open spaces, civic spaces and Blue Ribbon Network, and Westminster’s biodiversity; including protecting the unique character and openness of the Royal Parks and other open spaces; and to manage these spaces to ensure areas of relative tranquillity in a city with a daytime population increased every day to over one million workers and visitors.”

LPGT response: The proposals are clearly in contravention to this with the increase in urbanisation of a tranquil green space, loss of amenity and reduction in play space.

4.4 Play Strategy: It is noted in the Open Space Strategy Audit (2007) The strategy notes that there are only four local parks in the city of Westminster and therefore there are significant Areas of Deficiency for access to local parks throughout the City. It shows that VTG (Map WRS) is surrounded by an Area Deficient in publicly accessible Play Space.

LPGT response: by reducing the play area, and informal grass play space by 26%, the proposals are clearly contrary to WCC policy. Additionally it is not suitable for such a necessarily sombre monument such as the HMLC to be placed so close to a historically important, and still much used playground. The two uses of a site in such close proximity are entirely incompatible.

5.0 Comment on the public consultation

The Applicant’s Statement of Community Consultation poses the question ‘Who decided to locate the memorial in Victoria Tower Gardens?’
Victoria Tower Gardens was initially suggested by the UK Holocaust Memorial Foundation advisory board as a potential location for the Memorial and Learning Centre. The then Prime Minister, accepted this recommendation and first announced the chosen location at Prime Minister’s Questions on 27 January 2016.’

NPPF 38 “Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers…”

NPPF 39 “Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community”

LPQT response: It is clear from this statement that no brownfield sites were considered and that the local community were not given the opportunity to suggest alternative possibilities of a more sustainable nature that would not build on protected and well-used greenspace. The local community have identified other possibilities that would have been a perfect opportunity to improve the area whilst maintaining a desire for juxtaposition with parliament. Therefore the requirements of the NPPF have not been met.

Similarly, the applicant chose to refuse a request to see the arboricultural studies, which now do show that harm is likely to the trees. The phase 2 limited public consultation was only concluded two weeks before the planning application was submitted suggesting that this was not a consultation exercise – indeed their own statement does not suggest that the plans would be adapted further. We consider that the requirements of the NPPF have therefore not been met.

Summary:
‘Heritage’ also falls under the NPPF’s principles of ‘Sustainability’. Similarly, public access, enjoyment and the contribution to public health and well-being by open, green high quality public parks and gardens, as well as their contribution to London’s cultural offer constitutes a principle of ‘Sustainability’.

The scale of the proposed development, the size and massing of its structures, its juxtaposition and obscuration of the Buxton Grade II* Memorial, Spicer Memorial, and designed open views to Grade I Victoria Tower and Parliament from the south of the Gardens, will result in significant negative and harmful changes to the Gardens. It will turn a calm garden space into a cluttered, visually congested, urbanised landscape, especially at the south end. This will put further pressure on the rest of the landscape, currently characterised by its open nature. Furthermore, trees supposedly protected by their inclusion in the Conservation Area, are at considerable risk during and after development. The loss of play and open space is clearly in contravention to Westminster City Council’s own planning policies. In destroying its tranquillity, the proposal will fundamentally damage the character of the Registered gardens.

LPQT considers that the application constitutes substantial harm to this historic Garden and the setting for the associated heritage assets. The scale of this harm outweighs the public benefit provided by the development, due to the irreconcilable constraints of this site.

For these reasons, The London Parks and Gardens Trust object to the application.
Yours Sincerely,

Sally Prothero CMLI, MSc Historic Cons. MIFA
Chair, Planning & Conservation Working Group
C/o London Parks & Gardens Trust
Duck Island Cottage
St James's Park
London SW1A 2BJ
sally.prothero@londongardenstrust.org.uk

Cc Margie Hoffnung, Conservation Officer, The Gardens Trust

ENC: Victoria Tower Gardens Conservation and Significance Statement LPGT January 2019
Aesthetic Values

- As the simple, quiet and contemplative landscape setting providing long, designed views to Grade I listed Houses of Parliament, & Burghers of Calais, and Grade II* listed Anti Slavery Memorial, framed by mature London Plane trees.

- As the simple, spacious setting with clear views to parliament for the Grade II* listed Anti Slavery Memorial, also on axis with Dean Stanley St with clear views to St Johns Church.

- A park and garden with open lawns, planting and play area, designed specifically to provide for formal and informal play and recreation, creating a relaxed and joyful park space.

- Specifically located Pankhurst Memorial, in the main entrance to the gardens.

- The London Planes and simple grass lawns provide visual calm and physical relief and respite from the busy traffic and make up the unique qualities of this iconic part of central London.

Communal Values: Public and Community Use

- As an invaluable respite for the many communities, workers and tourists that live in, and/or visit this densely populated area of London, opened for public access through a gift and parliamentary funds in 1879.

- For the contribution to the local population’s health and well-being, given most local, high density dwellings do not have access to gardens.

- Its value as an amenity in an area acknowledged as ‘deficient in play’ in WCC’s Open Spaces Strategy 2007 and bordering an area of ‘open space deficiency’, (2018 strategy) making its communal value all the more significant.

- As a calm, garden space with mature trees, providing access to nature.

Historic Values

- The gardens were chosen for the location of the Abolition of Slavery monument, once moved from Parliament Square. From Historic England’s ‘Reason for Dedication’ in its list entry: ‘The significance of the monument is enhanced by its location; it commemorates one of Parliament’s most momentous Acts, and its principal dedicatee is the parliamentarian responsible for ensuring the passage of that Act’. Especially relevant today in light of the Modern Slavery Act, 2015.

- Political rallies attracting tens of thousands of people often use VTG as a venue for speeches, being the key large space associated with Parliament and democracy.

- TV and Broadcasting: The large open area has the capacity to have multiple broadcasts going on at the same time and the images are transmitted across the globe with the iconic view of Victoria Tower in the background.

Evidential Values: (Archaeological)

- The Park sites within the Westminster Abbey and Parliament Square Conservation Area with the northern end of the site included in the Area of Special Archaeological Priority.

- Westminster and Whitehall have been central to royal government administration of the country since the medieval period and has spiritual, symbolic, political, historic, architectural and archaeological significance. For nearly 1000 years it has been at the centre of the country’s most historic events such as coronations, royal weddings, state funerals and general elections. Buildings within the APA are recognisable throughout the world and few other places within London or the rest of the country have such a richness of archaeological potential which can be associated with so many historic events over such a prolonged period of time.’
Community Values: Public and Community Use

As an invaluable respite for the many communities, workers and tourists that live in, and/or visit this densely populated area of London, opened for public access through a gift and parliamentary funds in 1879 with the southern section covered by the 1900 Act, for use as a public garden.

For the contribution to the local population’s health and well-being, especially given most local, high density dwellings do not have access to gardens.

Its value as an amenity in an area acknowledged as ‘deficient in play’ in WCC’s Open Spaces Strategy 2007 and bordering an area of ‘open space deficiency’, (2018 strategy) making its communal value all the more significant.

As a calm, garden space with mature trees, providing access to nature.

SUMMARY OF SIGNIFICANCE FOR COMMUNITY USE AND WELL-BEING

Significance explains what matters about the gardens, why it matters and to whom. It is based on the ‘Values’ as defined by Historic England, as the basis for developing management guidelines so the positive aspects of Victoria Tower Gardens can be conserved in perpetuity.

The Community Values as well as Health and well-being benefits of the gardens, are depicted further in this plan.
LPGT PLAN 3:

CALCULATION OF OPEN SPACE and GREEN SPACE LOST TO DEVELOPMENT

AREA of CURRENT, OPEN, grassed RECREATIONAL SPACE (light blue line) = 10952m²

TOTAL AREA of PARK (red line) = 19078.836

AREA of PARK NO LONGER FREELY ACCESSIBLE is 7.1% of total park area. (solid yellow line denotes ticketed are, built structures, viewing points and ticketing/security building) = 1,353m²

LOSS OF EXISTING GREEN SPACE by AREA of ADDITIONAL HARD STANDING, (shown by dashed yellow line) ACCESS AND PLAZA AREAS, CURRENTLY GREEN SPACE. = 1,594m²

1. Lost area of existing play area = 167 m²
2. Plaza and access paths: 1386m²
3. Lift access / hard-standing 61m²

Therefore LOSS OF TOTAL GREENSPACE BY MEMORIAL DEVELOPMENT AND HARDSTANDINGS = 26.9%

(1353 + 1594) X 100 = 26.9%  
10952

Note the encroachment into the play area by 9.6m

TOTAL PARK lost to development = 2947m²