

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



8 February 2019

Dear Mr Dorward,

19/00114/FULL

The Victoria Tower Gardens, Millbank, London, SW1P 3YB

Proposal: Installation of the United Kingdom Holocaust Memorial and Learning Centre including excavation to provide a basement and basement mezzanine for the learning centre (Class D1); erection of a single storey entrance pavilion; re-provision of the Horseferry Playground and refreshments kiosk (Class A1); re-positioning of the Spicer Memorial; new hard and soft landscaping and lighting around the site; and all ancillary and associated works.

Thank you for consulting The Royal Parks (TRP) on the recently submitted planning application for Victoria Tower Gardens.

TRP strongly supports the principle of creating a new Holocaust Memorial and Learning Centre and agrees with the compelling reasons for doing so at this time.

The Royal Parks is the charity with responsibility for managing eight of London's Royal Parks and other land in the capital including Victoria Tower Gardens, on behalf of the Secretary of State for Digital, Culture, Media and Sport. The decision to consider locating the Memorial and Education Centre in the park was made by Ministers prior to the formation of the charity. Ministers have made clear that there is no role for the charity in the approval process.

TRP's charitable objects set out the main purpose of the charity which include to protect, conserve, maintain and care for all of these parks, including their natural and designed landscapes and built environment, to a high standard consistent with their historic, horticultural, environmental and architectural importance.

After reviewing all the details submitted, TRP considers that Victoria Tower Gardens is not an appropriate location for the proposed structure. TRP does not support this planning application given the impact it will have on a popular public amenity space in an area of the capital with few public parks.

We offer the following observations on the proposals contained in this Planning Consultation as set out within this letter and its supporting Appendices A-F. TRP would be pleased to meet and discuss the contents of these comments with Officers should it be considered helpful.

The Site

The site comprises Victoria Tower Gardens, a small park of triangular shape and next to the River Thames, providing important green open space in this part of central London. The Gardens comprise a Grade II Registered Park and a Site of Nature Conservation Importance, adjacent to Smith Square Conservation Area and within the Protected Vista 2A and B backdrop. Victoria Tower Gardens is adjacent to Westminster Abbey (Grade I Listed) and the Houses of Parliament (Grade I Listed) collectively designated as a World Heritage Site.

Victoria Tower Gardens is therefore in a highly sensitive location in planning and heritage terms. It is considered that the proposed Holocaust Memorial and Learning Centre, given its scale, design and loss of public open space, would have significant harmful impacts on the consequent character and function of this space which the important designations are in place to protect.

Whilst a large part of the education centre will be underground, we estimate that up to 15% of open space would be lost. The impact of the building footprint on the topography will fundamentally change the historic character and associated vistas in and out of the park. The structure will dominate the park and eclipse the existing listed memorials which are nationally important in their own right. In these respects the proposals are not in accordance with City Plan Policy S25 Heritage, S26 Views, S28 Design S35 Open Space and corresponding London Plan policies.

The proposals are also wholly contrary to City Plan Policy S11 Royal Parks where developments are only allowed where they are essential and ancillary to maintaining or enhancing the value of the park as open space.

Arboricultural and Ecological Impacts

The Royal Parks is further concerned about the impact that the construction will have on the mature London plane trees that frame the riverside. The deep extraction work required could seriously affect their health. The site is also part of an ecological network and is a valuable stepping stone to other habitats for use by protected species of bats and night flying invertebrates to roost, as well as use by breeding and nesting birds such as robins and blackbirds. This biodiversity would be negatively impacted by such a loss of habitat. The proposals are therefore not compliant with City Plan Policy S36 Sites of Nature Conservation Importance and S38 Biodiversity and Green Infrastructure. For further detailed information relating to arboricultural and ecological considerations please refer to Appendix A and B.

Construction Impacts

TRP notes that the developer intends to keep "open [the gardens] to the public as far as possible during construction". The Gardens are public open space and we would not wish to close such a large area, or the possibility of the entire Park, to visitors for the 3 years of its construction, particularly as the Garden is located in an area of open space deficiency. The proposals are thereby not supported by City Plan Policy S35 Open Space.

Our observation regarding construction and the sustainability impacts of the proposed development with respect to energy, air quality, waste and water management are detailed within Appendix C. These aspects of the proposals should be properly reviewed against policy requirements including City Plan policies S40 Renewable Energy and S44 Sustainable Waste Management.

TRP recognises that whilst some of the landscape improvements such as the riverside walkway could deliver benefit we believe that overall the proposed construction of the centre will have a negative impact on the visitors' enjoyment of the park.

Operational Management

In terms of visitor management, the United Kingdom Holocaust Memorial Learning Centre estimates that an additional one million people are expected to visit the site in its first year. We are concerned about the footfall pressures that this will create given the desire lines from the north to the south of the park where the centre and memorial would be located. This could lead to congestion (especially near the entrance that leads from Abingdon Street) noting the park currently receives around 1.5m visitors a year. The proposal for pre-booked timed tickets is noted but we estimate that the necessary security measures will lead to queues and congestion near the entrance to the education centre. With the expected one million additional visitors to the Gardens, the impact that extra footfall will have in terms of the enjoyment of existing visitors should be assessed as should the impact on regular visitors who will find themselves displaced due to the reduction in public open space. The proposals are not compliant with City Plan Policy S29. Further detailed considerations are set out in Appendix D.

Engagement

It is noted that consultation by the applicant and by WCC has been undertaken as part of the planning application consultation process. We note the strong opposition to the proposals in particular regarding the selection of Victoria Tower Gardens as the proposed location for the Holocaust Memorial and Learning Centre. These representations are echoed by those expressed in TRP's engagement. The concerns that have been expressed to TRP by stakeholders are summarised in Appendix E. It should also be noted that the submitted EIA Scoping Report has not been prepared with the involvement of TRP and our full comments are set out in Appendix F.

Summary

Overall, the sombre nature of the memorial, the large structure and the necessary security measure around the curtilage of VTG will change the nature of what is currently a relaxed park alongside a unique riverside location. The proposals are also contrary to planning policy.

We respectfully request that the full and detailed content of our representations contained within this letter and its supporting appendices be fully reviewed and taken into account as part of the planning application's determination in the context of TRP's statutory duty to manage and preserve Victoria Tower Gardens.

Please note that TRP reserve the right to make supplementary submissions as necessary in response to and in line with the planning application's determination.

Yours Sincerely,



Darren Woodward

Director of Estates & Projects

Enc. Appendices A-F

