



Historic England

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Mr David Dorward
City of Westminster
Westminster City Hall
64 Victoria Street
London
SW1E 6QP

Direct Dial: 020 7973 3774

Our ref: P01021522

1 March 2019

Dear Mr Dorward

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**THE VICTORIA TOWER GARDENS MILLBANK LONDON SW1P 3YB
Application No. 19/00114/FULL**

Thank you for your letter of 14 January 2019 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Historic England Advice

Historic England has been involved in pre-application negotiations on the development of the proposals for some time, and we provided detailed advice to the applicant in a letter dated 7 November, 2018. I have enclosed this letter, which provides a detailed analysis of the site, its context and the relevant Government policy before setting out in detail the specific elements of the proposals that we believe should be amended to mitigate the harm to the historic environment.

The proposals in the submitted application have not changed substantially from the proposals we considered at pre-application stage, and we are therefore disappointed that the amendments we suggested have not been followed through, and that some significant harm remains. We understand that a revised design for the entrance pavilion is being considered and we will assess this if it is formally submitted.

The proposals would, as before, introduce a series of large structures to a very constrained and sensitive Grade II registered historic garden, and would fundamentally change its character. As set out in our letter from 7 November, the proposals would harm the significance of the registered garden by decreasing the amount of open space and increasing the amount of built structure on what was designed in the late 19th century and early 20th century as a simple, uncluttered public garden. Integral to the significance of the registered garden are the mature plane trees that line much of the perimeter of the park. The extent of underground intervention proposed means we are generally concerned about the protection of the trees. We have considered the



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accompanying reports that set out how these trees and their root systems would be protected during and after construction, and acknowledge that the reports have been produced by suitably qualified arboricultural consultants following industry best practice. However, we are concerned that some elements of the proposals have not been fully assessed in terms of their impact on the trees' root systems. For example, the impacts of the proposed southern vehicle access for construction, the proposed improvements to the play area and the proposed cafe/bike storage/generator building within the playground, do not appear to have been assessed at all. It remains, therefore, that there is not a confident understanding of the potential impact on the trees which form a major part of the historic landscape's significance.

Given the significance of the trees as constituent elements of the registered garden and this part of the wider conservation area, their contribution to the setting of the Palace of Westminster and the World Heritage Site, and the harm that would be caused to these designated heritage assets through the decline and/or failure of the trees, Westminster City Council should seek further clarification on the points above, which includes commissioning its own independent review by a suitably qualified arborist and soil scientist, before determining the application.

The submitted proposals would also, as we previously noted in our pre-application advice letter, have a detrimental impact on the significance of the Grade II* listed Buxton Memorial by encroaching upon its setting and eroding its prominence. We remain of the view that the relationship between the new Holocaust Memorial and the existing Buxton Memorial could be improved by seeking consent to move the latter to a more prominent and open site within the park.

The proposals are likely to have a serious impact on significant and potentially well-preserved archaeological deposits on the site, which is within the Palace of Westminster and Whitehall Archaeological Priority Area (APA). Detailed advice on archaeological issues, including potential impacts due to changes in the hydrology of the site, has been set out in detail in a separate letter from the Greater London Archaeological Advisory Service (GLAAS), dated 19 February, 2019.

Whilst the proposal site is outside of the boundary of the Westminster World Heritage Site, the proposed development could have an impact on the WHS and its Outstanding Universal Values, which are broadly derived from its collection of the nation's most significant governmental and ecclesiastical buildings in a range of Gothic styles that represent the development of the British state and its values over almost a thousand years. We note that the proposed memorial would appear in some views of the WHS from the southern end of the park (View 43 in the Verified Views and Architectural Views document submitted with the application), and that the neo-Gothic architecture of the Palace of Westminster rising up from the landscape would be less legible. We acknowledge that this relationship would be changed in this particular view, causing minor harm, but we also note that the visual relationship will be



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preserved a few metres to the north in a view (View 44 in the Verified Views and Architectural Views document) that equally strongly represents that attribute of OUV relating to the neo-gothic architecture of the Palace of Westminster. In that regard, we believe that the proposals would not significantly harm the OUV of the WHS.

Cumulatively, we believe that the harm caused to the significance of designated heritage assets, including the registered park, listed buildings and conservation area by the new proposals as set out above would be serious, but less than substantial in the language of the NPPF (paragraph 196). However, it is unclear to what extent the proposals would impact on archaeological deposits that may be of national importance, as well as on the historic trees that form such a significant component of the registered landscape. As set out in our detailed letter on the archaeology of the site, we advise further pre-determination work.

We recognise the importance of the Holocaust Memorial and Learning Centre to London and the nation, and the potential public benefits it could bring. We have previously advised that the harm to heritage would be less in a less constrained and historically significant site. However, it is for your authority to weigh the harm identified above against the public benefits of the scheme before you determine the application. Given the proximity of the proposals to the Westminster World Heritage Site, as noted above, we also urge you to ensure that you are satisfied with the submitted documents that relate to the impact of the proposals on the WHS and that they are in accordance with ICOMOS guidance.

Recommendation

Historic England has concerns regarding the application on heritage grounds for the reasons set out above. We consider that the harm to designated heritage assets as outlined in our advice needs to be weighed against the public benefits of the proposals in accordance with paragraph 196 of the NPPF.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

This response relates to designated heritage assets only. The Greater London Archaeological Advisory Service has already submitted a separate letter setting out Historic England's advice on archaeological matters as specialist archaeological adviser to the local planning authority.

Yours sincerely

Michael Dunn

Principal Inspector of Historic Buildings and Areas



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