SAVE VICTORIA TOWER GARDENS

OBJECTION

The SAVE VICTORIA TOWER GARDENS Campaign (Save VTG or the Campaign) was founded in the autumn of 2016 - to coincide with the launch of an international architectural competition aiming at selecting a team to design and deliver the National Holocaust Memorial proposed by David Cameron. It was intended at the time that this would be built within Victoria Tower Gardens, alongside an associated Learning Centre, the latter to either be co-located underground with the Memorial, or to be built elsewhere in the general vicinity.

**The Campaign is supported by a very large number of individuals and organisations that rally behind its single, primary aim, to avert at all costs any type of new construction within Victoria Tower Gardens (VTG).**

**To date, 11300 people have signed Save VTG’s online petition, seeking to stop this project; over 750 have objected on the Planning Portal to the latest proposal; and many more have written against the scheme during the course of two Public Consultations. These numbers are still growing significantly on a daily basis.**

**Save VTG’s supporters originate not only from SW1, but from all over London, all over the UK, and indeed from abroad. Objectors are a mix of local residents, local workers, visitors, tourists, and many outraged experts and professionals working in the built environment sector, landscape and conservation. With the ramifications of this dispute affecting an area far wider than just SW1, this campaign must rightfully be seen as a deeply-held, London-wide issue.**

Save VTG fully supports the Government’s and the UK Holocaust Memorial’s intention to build a lasting, significant and exceptionally high-quality memorial to the Holocaust, now long overdue. It also supports their intention to greatly improve national outreach capacity, teaching every generation across the country about the evils of racism and the horrors of the Holocaust.

The Campaign is however at the same time also very clear that Victoria Tower Gardens is, and will always be, totally inappropriate as a site for any type of building, whatever the size or brief. It is supported in this belief by a raft of extremely prescriptive existing planning policies relating to building in parks, to averting the loss of public green space, and to protecting both the character of unique conservation areas and the value of priceless historic assets.

The smallest park managed by the Royal Parks, VTG is in itself a listed Grade 2 Designated Asset, within a Conservation Area, and within the setting of a World Heritage Site. The only park directly on the Thames in Central London, it is bound to the North by the Grade 1 listed Houses of Parliament containing the Grade 1 Victoria Tower, and to the East by the Grade 2 River Wall; it contains several other listed monuments, the Grade 1 Rodin grouping being one of them; is in a Tier 1 Archaeological Priority Area; and is intersected by a series of Protected Views.

Despite its hitherto low profile (*not* to be confused with neglect), giving it an extraordinary, ‘hidden gem’ quality, VTG is a totally unique, priceless, unrepeatable place in Central London that combines huge historic, architectural and emotional significance. It is therefore hard to understand that this totally ‘taboo’ park should have even come to mind during the supposedly professional and rational search and evaluation of sites for the Holocaust Memorial. It is understood that Lord Feldman was the originator of the suggestion to use VTG.

Save VTG does not intend to repeat, in this statement, the many valid arguments that have been very eloquently raised by so many Statutory Consultees and other organisations, several of which have relied on professional planning, legal and technical expertise for the drafting of their reports.

The Campaign does nonetheless **totally subscribe** to all the objections raised by such stakeholders, including Royal Parks, London Parks and Gardens Trust, Open Spaces Society, Barrell Tree Consultancy, ICOMOS, Historic England, Historic England Greater London Archaeological Advisory Service, Westminster Society, The Thorney Island Society, the Environment Agency and Transport for London.

While the Campaign’s own statement must therefore be read in conjunction with those submitted by the above consultees, it wishes nonetheless to raise a number of potentially different, specific issues. These reflect its own observations regarding the nature of the project, the way it has evolved, the way it has affected its supporters, the way it is evolving during the planning process, hopefully speaking to WCC’s recently promised “Planning Revolution” aiming at “reinforcing the role of residents at the heart of the planning process” - presumably by giving more weight to public opinion.

* **Lack of transparency:** 
  + Contrary to policy, the applicants have totally neglected, from the very inception of this project, to consult with stakeholders regarding the choice of site. Not only; following earlier protestations, they consistently refused at every step to engage constructively with objectors, to discuss alternative choices of site, or seek potential compromises. ­­
  + All information regarding project decision-making (including minutes and correspondence) has been tenaciously kept from the public, to the point that objectors have had little or no access to documentation of relevance (despite multiple very targeted FoI requests and Parliamentary Questions)
  + The two Public Consultations were minimally and/or only locally advertised. The second Consultation was announced only a few days before the event, as shown from the very poor turnout (250 people), compared to the massive ±10K people who had by then signed the petition and were obvious interested parties.
  + While the vast majority of the comments to the consultation were clearly negative (see Statement of Community Involvement in Documents), a deceitful positive spin was reported on the boards in relation to how the project was being received.
  + The drawings at the Consultation and even on the Portal are very difficult to read, not only for the general public but also for architects and professionals in the sector. Many are still now ‘impressionistic’, and totally misleading. The scale is very small, the drawings are very faint, and several crucial ones are missing, thereby giving only a partial understanding of the physical impact of the development in relation to context.
  + Despite repeated requests, there has been a total lack of information in relation to the content of the Learning Centre, and to the business case that supports the construction and the running of this building.

* **Missing information:**

Save VTG hereby formally requests the following additional information:

* + - Results of further Root Protection Area investigations, to be extended to a depth of 7-8m below ground, as per Barrell report and mentions by numerous other tree experts. This request has been officially conveyed to the Case Officer and WCC Tree specialist.
    - Results of investigations at depth also in the central part of the lawn, from the area between the two rows of trees, and at a much greater radius than 12m from the tree trunks ( eg 15-20m)
    - Site sections legible at a reasonable scale (1:500 and 1:1000) covering the entire length of the park, to allow an accurate reading of the relationship between Houses of Parliament, the Burghers of Calais, the Mound, the playground and Lambeth bridge, in both E and W directions
    - Verified Views of the Memorial and the Buxton Memorial from Smith Square and at several points in Dean Stanley Street, including views of the Buxton memorial seen through the glass walls and sunken courtyard.
    - Accurate 3D views including taken at eye-level of the entire development (using Vu-city technology or similar) in relation to all surrounding architecture and trees, including from the Lambeth side of the river at various heights.
* **Mis-reading of Scale**
* Many of the objections recorded on the Portal relate to a complaint that the architects, and their Clients, have been trying to stubbornly shoe-horn a very large, and very public building onto a site that is far too small to receive it. This appears to be an unforgivable error of professional judgement, particularly worrying given the reliance of the scheme on tax-payers’ funding.
* With the need to avoid the roots of the over 100yr-old plane trees, the footprint - and the brief- of the Learning Centre have had to be curtailed from the original one devised in 2015. The underground building is now reduced to an awkward size - one that cannot remotely accommodate the original brief, and yet still manages to ruin the park.
* It has been said by many that a much higher quality Learning Centre could be built on a more generous site, and far better suited to handle 1m people per year.
* A symptom of the tightness of the site is evident in the proposal that an outdoor café (to be used by 1 million visitors/year!) should be shared with the playground (a totally incongruous and unsafe arrangement for the children).
* The arrival arrangements and security, particularly in bad weather, will no doubt be chaotic and unpleasant, as the external area reserved for this element of the visit is constrained and no doubt insufficient for anticipated numbers.
* The suggestion of pre-ticketing does not deal with the many casual visitors that will turn up un-announced. Will they be sent away? Will they be milling under-foot, frustrated by not being allowed in?
* **Mis-representation of scale**
* Given the size of the mound, with the fins nearly as tall as the top of the Buxton memorial, there is a strong sense that the CGIs do not convey the full visual impact of the Mound on people standing near the Burghers of Calais. The importance of the disruptive mound cannot be over-emphasised: it will be cutting the park into two distinct sections, interrupting views and shortening precious vistas. Families with children of varying ages will be divided between lawn and playground; visitors approaching from Lambeth Bridge will lose forever the pleasure of walking towards the Houses of Parliament, gradually taking them in in all their majesty. The architects owe the public and WCC a realistic representation of their intention and its consequences.
* We need to understand accurately what is proposed. The fluid, ‘artist’ impressions submitted are not to be trusted. WCC should request from the applicant better, more complete and more accurate 3D representations of the proposed Mound, buildings and Sunken Courtyard in relation to context.
* **Mis-reading of Context**
* Hand in hand with under-estimating the size of VTG in relation to the building programme, there is also a sense that other vital, specific qualities of this site have been missed by those who were so quick to unilaterally gift the park to the UK Holocaust Memorial Foundation.
* It is very obvious, from reading the few comments left by those who support the scheme, compared with the comments written by those who object, that the former group has no in-depth, personal acquaintance with Victoria Tower Gardens. To them, this is a green space like any other green space – which is clearly an illiterate and superficial reading of one of London’s great assets.
* This cavalier approach is a confirmation of the fact that we should not be allowing important planning decisions to be made by those who cannot even be bothered to examine in depth a setting they are willing to destroy.
* VTG is a unique place, a place loved my many for different reasons. Eric Pickles, with too many others, in urging the demise of this park, might well dismiss it as neglected. All this shows however is a total lack of his appreciation of Grade 1 listed buildings and their context, wonderful ancient trees, and some of London’s best views. To be blind to all of these is an indictment, and a sign of unique insensitivity to beauty and history.

To progress with this scheme would be immensely reckless from many perspectives. It would no doubt result in a number of major irreversible negative consequences for this iconic area of Westminster and for London as a whole. The Walkie Talkie or the Strata Building are fitting examples of the degree of disastrous, lasting influence that can be exerted on a city as a whole, by building a highly visible, wrong building in the wrong place.

One must also remember that this development is not only totally inappropriate for this location, it has also been hugely controversial from the start. With bad feelings no doubt lingering for years to come, this project would not be setting off to a propitious spirit start.

As it stands, the proposed Memorial and Learning Centre, if consented, would forcibly do away forever with the one highly used, family leisure spot that generations of people living in this area have enjoyed; it would also most likely kill a minimum of 15 plane trees; alter forever the character of the park; obliterate endless iconic views that have brought deep pleasure to millions of people; create a high-security site that could soon become a no-go area for locals; and generate unpleasant and un-controllable congestion by attracting day in and day out thousands of visitors, both casual and in organised tours.

To proceed with this scheme would be to inflict self-harm and to deepen what is by now a real wound, at a specific moment in history in which this country should be looking to find ways of overcoming additional, un-necessary divisions.

**This is not about anti-Semitism, as the many letters written by members of the Jewish community prove. It is a planning matter.**

All of this could be easily avoided by choosing a larger, better, non-controversial site; with the added benefit, as we no doubt all know, on both sides of the debate, that the result would be far more positive for the Holocaust Memorial and Learning Centre itself.

**It might be time to set aside political interests in favour of promoting the real aims of this memorial, ones we can all agree.**