

Consultee Comments for Planning Application 19/00114/FULL

Application Summary

Application Number: 19/00114/FULL

Address: 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); repositioning of the Spicer Memorial; new hard and soft landscaping and lighting around the site; and all ancillary and associated works. (The application is accompanied by an Environmental Statement (ES) which may be viewed with the application documents) (This is a reconsultation following amendments to design for the Entrance Pavilion; Adjustments to the design of the Memorial Courtyard and associated landscaping; Rationalisation of the Learning Centre basement footprint; Extension of the Learning Centre basement mezzanine level; and Repositioning of the skylight within the landscape).

Case Officer: David Dorward

Consultee Details

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On Behalf Of: Thorney Island Society

Comments

RESPONSE BY THE THORNEY ISLAND SOCIETY TO THE AMENDMENTS TO PLANNING APPLICATION 19/00114/FULL

PRINCIPAL OBJECTIONS OUTSTANDING

1) We have examined the amendments to the planning application and we believe that the scheme has not been materially improved and none of the problems we raised in our first letter of objection have been addressed. The principal objections were that:

a) The site is totally inappropriate for this project. A development of this size, freighted with the appalling reality of the Holocaust, will profoundly and completely change the character of this well-loved local park.

b) The loss of green space and the severing of the childrens playground from the rest of the park is unacceptable. This park is in an area with a large residential population and a significant number of office-workers and civil servants, who use the park a great deal.

2) The changes to the scheme are:

- a) The entrance pavilion has been completely redesigned
 - b) The courtyard has become very slightly narrower, with lower fences either side, and without the glass viewing panel opposite the Buxton Memorial. It has also been reworked with simpler ramps, side benches and three ornamental trees.
 - c) The interior of the Learning Centre has a slightly smaller lower floor, a larger mezzanine and a repositioned skylight. The repositioned skylight is the only material impact at ground level. The overall area of the Learning Centre has not changed.
- 3) These changes are insignificant in the context of the location near a World Heritage Site, in a Conservation Area, and within rare green open space.

PREVIOUS COMMENTS UNADDRESSED

- 4) In Section 3 of our comments we criticized the drawings and CGIs. There have been few improvements. The view (No 23) from within the playground is new, but it simply bears out our concerns over the way the views towards the HoP will be interrupted and the playground will be dominated by the Memorial structures. We are still concerned that the choice of lens size has given the wrong impression in some of the views, such as View 17.
- 5) We also requested, under Clause 18 (3) (d) of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017, all information available regarding the Applicants consideration of the environmental impact of this scheme compared with alternative options. To date, all we have been offered is a very partial list of sites originally considered, from the point of view of their availability and affordability. Quite clearly the environmental impact of construction on this site will be worse than most, as indicated by a number of statutory consultees.

6) APPEARANCE/DESIGN

The principal change is to the entrance pavilion. This is a slight improvement on the first design, and, as far as the pavilions detailed design goes, it now bears some relationship with the courtyard, but neither has a meaningful design connection with the Memorial fins and Learning Centre, let alone with the neighbouring structures.

The north face of the entrance pavilion, which visitors will confront upon leaving the Learning Centre, is very undistinguished the openings, on plan and elevation, look like a row of swimming pool changing cubicles.

7) LANDSCAPING

Expanding on our previous comments, in many of the Sections (eg Long Section 4 & cross Section 6) it is clear that the depth of soil cover over the Learning centre is very varied. This will result in uneven growth because parts of the grass area will dry out more quickly than others. This is bound to result in parts of the grass being fenced off, further restricting the amount of useable open space.

A level surface is much more practical in such a heavily used garden, while a slope is always going to be vulnerable to misuse (children having fun), causing the grass to wear out more quickly.

8) FLOODING

Further to our previous comments we note that the Environment Agency asks for an improved Flood Risk Assessment, and say that It is unlikely that we would grant a flood risk activity permit for this application with the current information. We cannot find any new Flood Risk Assessment or any acknowledgement of the serious concerns of the Environment Agency.

9) SECURITY CONCERNS

See DAS 4 p8: Courtyard: The final design has still to be finalised, an identified problem being the conjunction of the level platform in front of the benches with the ramps beside them. However, the flaw in the sloping courtyard design, which we pointed out in paragraph 9a of our first objections, remains. This is the security threat that missiles thrown over the fence into the courtyard will be able to roll down the ramps and tumble straight down the several staircases into the Threshold space. This danger has now probably been increased by the design for ramps that lead straight down to the entrances.

10) COMMENTS ON THE TAVERNOR EXECUTIVE SUMMARY IN THE DAS (PP 9-11 OF PART 7)

There are a number of contradictory claims, among them:

- a) The partial obscuring of the Buxton Memorial by the fins and mound could not possibly enhance its setting.
- b) It is claimed that from Lambeth Bridge (and the opposite side of the river) the mature trees will continue to largely shroud VTG. This is true enough, but negates the claim for the hill that it will provide a view of the river which it wont when the gardens are most used, in the summer.
- c) The description of the new and powerful character of the southern end of the gardens seems to rest on meandering paths on the subtly sloped carpet of grass, which is meaningless. These meandering paths, actually toughened grass which simply go up and down the hill, serve no function and will play no part in the visitors access route to the Memorial entrance.

11 COMMENTS ON THE PLANNING STATEMENT ADDENDUM

Below are our comments on numbered items in the Planning Statement:

2.6 ii The Geraldine Mary Harmsworth Park, the site of the IWM, is a genuine garden of remembrance it already contains a Soviet war memorial, a Tibetan Peace Garden, and a memorial to two Chileans disappeared by the Pinochet regime. The location of these memorials, remembering events that occurred outside this country, would make that park a more fitting setting for a new Holocaust Memorial.

2.6 iv What is the resonance, in the context of the Holocaust and Genocide, of being next to the

river?

2.6 v There is a total muddle about why the relationship with Parliament is so important that it should determine the location, with many completely different justifications being offered generally banal, irrelevant or peripheral to the purpose of the Memorial, which should be about the Holocaust and its victims. For example, it is suggested that the Memorial should be questioning the impact the Holocaust had on Parliament.

2.7 The IWM is in Southwark Council, not in Lambeth, and Southwark supported the original scheme proposed by IWM.

2.8 The design offered by the IWM was much more than that portrayed in this paragraph. As well as the six panels on the side of the building, representing the six million killed, there was a proposal for a garden feature with a narrow shaft of light, which would have been projected upwards to be genuinely visible from far and near. The spacious location, on the quiet side of the museum building, would create a much more fitting place for contemplation than a courtyard with a playground to the south, a main road to the west, and a totally unrelated memorial looming over it on the east.

2.13 The objection that there is no relationship between the entrance pavilion and the memorial fins remains. The new pavilion design is less stolid than the earlier one, and now bears some design relationship with the courtyard, but it still has no discernible relationship with the rest of the complex, or with the Spicer Memorial, which the spiked corner of the projecting roof nearly overshadows.

2.19 The statement that the Majority of [the] Memorial [is] hidden from view totally contradicts the stated aim of establishing a relationship between Parliament and the Holocaust Memorial.

2.25 We note that the council is encouraged to take into account the material considerations arising from the unique scope of the building. We agree that this is a unique project but we do not consider that the benefits outweigh the disbenefit of altering the atmosphere and utility of a very well-used and loved park. One must consider the opportunity cost in spending money in this very extravagant and bombastic way, when it could have contributed to the redesign of the IWM Holocaust galleries, which will inevitably remain the principal locus for education on the Holocaust and for Holocaust education more widely and more directly across the country.

2.26 There are considerable problems with the claim of significant improvements to the landscaping:

a) The Buxton Memorial is visible from the whole park at the moment and is totally accessible it is therefore incorrect to say that the Buxton Memorial's visibility could be improved.

b) The playground already contains all the features described, so it will not be enhanced as claimed by the Statement. These features will likely sit mainly unused if the neighbouring building is a Holocaust Memorial. In the revised scheme the playground still remains completely cut off from the rest of the gardens. We have seen in many objections to the Application that parents do not feel comfortable with the idea of watching their children play in such a setting. The playground and the café meant for the playground will both be dominated by the hundreds of thousands of visitors foreseen (many of whom are predicted in the Applications visitor management plans, not to enter the MLC at all). So, in all probability almost the only people using the playground benches and the playground café will be Learning Centre visitors who buy snacks at the café.