

STATEMENT ON BEHALF OF THE
LONDON PARKS & GARDENS TRUST
IN CO-OPERATION WITH
THE GARDENS TRUST

PUBLIC INQUIRY

**Pre-Inquiry Statement of Case
Under Rule 6
Of the Town and Country Planning (Inquiries Procedure) Rules**

**Application for the Installation of a UK Holocaust Memorial and Learning Centre:
including excavation to provide a basement for the learning centre; erection of a single
storey entrance pavilion; rearrangement of the Horseferry Playground and refreshments
kiosk; repositioning of the Spicer Memorial; new earthworks above the basement building
and other hard and soft landscaping and lighting throughout the site; and all ancillary and
associated works; to be located in
The Victoria Tower Gardens, Millbank, London, SW1P 3YB**

Planning Inspectorate Reference no. APP/X5990/V/19/3240661

City of Westminster Reference no. 19/00114/FULL

February 2020

PRE INQUIRY STATEMENT FOR THE LONDON PARKS & GARDENS TRUST and THE GARDENS TRUST

1. This paper sets out the “Rule 6” statement of case for the London Parks & Gardens Trust, in co-operation with The Gardens Trust, both of whom object to the proposal for a new building and associated works to house a memorial and learning centre in The Victoria Tower Gardens; they will present united evidence to avoid time-wasting duplication. The Gardens Trust is the UK national charity dedicated to conserving our heritage of designed landscapes with a national network of County Gardens Trusts and is the statutory consultee for registered parks and gardens. The London Parks & Gardens Trust is an independent charitable trust established in 1994 as the County Gardens Trust for London. It aims to increase appreciation of London’s parks and gardens and to seek to conserve London’s green spaces for public use and enjoyment.
2. The Victoria Tower Gardens are registered Grade II. Nonetheless neither the Gardens Trust nor the London Parks & Gardens Trust were consulted by the applicant about the suitability of placing this development in these Gardens prior to launching their public consultation which assumed this location.
3. The Victoria Tower Gardens are part of the immediate setting of the Palace of Westminster, a World Heritage Site. ICOMOS were consulted about this proposal but concluded with reasons that *“the proposed memorial would have an adverse impact on the setting ...”* and *“therefore advised that the Holocaust Memorial and Learning Centre be relocated”*.
4. It is widely acknowledged that parks and green spaces contribute to human physical and mental health. For this reason Parliament’s own Communities and Local Government Committee, when recently considering the role of urban parks, *“strongly agree with those who have emphasised the importance and value of parks to individuals, communities, and to wider national agendas such as public health and should remain freely accessible to everyone”*. Evidence underlying these opinions together with Westminster City Council’s consequent policies will be cited, all suggesting how incorrect is the location for this proposal, however worthwhile its purpose.
5. The history of Victoria Tower Gardens will be outlined. Before the embankment designed by Bazalgette and Vulliamy was constructed the area was full of wharves and warehouses abutting the filthy shores of the Thames, itself little better than an open sewer. Gradually between 1867 and 1900 the site for the Gardens was acquired with contributions from Government, the LCC, and a gift from Mr W.H.Smith. In 1900 Westminster Council made a very large financial contribution towards the final integration of the southern half of the Gardens on condition that *“the lands ...be laid out and maintained ...[and] provided for use as a garden open to the public”*. Thus the single unified open space which has become Victoria Tower Gardens was brought into existence and subsequently during the early 20th century created as a simple, unencumbered, vibrant, joyful urban park,

simultaneously an asset for all sorts of people and a worthy setting for the Palace of Westminster.

6. It is unclear whether the applicant will have a right to acquire part of this space without the consent of those who originally financed it for public benefit as a freely accessible park.
7. Illustrated evidence will describe the Gardens, the calm green space, the lawns, the two avenues of majestic plane trees on either side, the outlook onto the adjacent Thames, the magnificent long view to the south elevation of the Palace of Westminster and Victoria Tower seen beyond a simple landscape. The deleterious impacts of the proposal upon these qualities will be analysed. The impacts are far greater than presented by the applicant due to management, footfall, security and other considerations.
8. The current multiple uses of the Gardens will be described, people seated in a natural environment, people ambling past on their way from one place to another, photography, people and their dogs at play, childrens' playground adjacent to free open space and so on. All these activities occur in a peaceful place where there is ample surrounding open space. The proposal before the inquiry detracts from these important and valued qualities both during the construction phase and on into the future.
9. A proposed underground structure would impinge upon buried archaeology, for instance the probable foundations of the Queen's Slaughterhouse of 1593. If important finds should be discovered could the proposal be modified to retain and display them?
10. There are some memorials in Victoria Tower Gardens which reflect past British governance and so are sensibly placed beside our Houses of Parliament. There is the memorial to Emmeline and Dame Christobel Pankhurst who jointly inspired and led the campaign to enfranchise women. There are Rodin's Burghers of Calais, players in a medieval example of merciful behaviour by the then royal government of England. There is the Buxton memorial in commemoration of the final emancipation of slaves in all British territories, a momentous Parliamentary Act and a subject relevant today. The Buxton Memorial itself is Grade 2* as stated on the monument itself "Erected in 1835 ...commemoration of the emancipation of slaves..." It was placed carefully at a vital axis to the park in juxtaposition with St John Smith Square as a mark of respect to those who died and suffered in the slave trade and under slavery. In contrast the proposal before the inquiry is for a memorial with no direct relationship to British governance and policies. The primacy of this location over any other more suitable and ideally brownfield sites, in heritage terms, has not been established by the applicant.
11. The evidence will also discuss some practical considerations. The future health of adjacent and historically valuable plane trees is a matter for concern, tolerant though this species is of urban conditions. The whole of the southern and much of the central area of the Gardens is where the trees are accustomed to garnering their nourishment for living through their spreading roots. Documentation giving advice about protection of trees, specially the British Standards, will be cited and the extent to which the

proposals have disregarded these standards will be pointed out. As well as direct damage to existing roots the effects of future ground desiccation will be relevant.

12. Some of the numerous visitors to the proposed Centre are expected to arrive by coach or taxi, which will obstruct the adjacent bus lane, and is a matter for traffic assessment.
13. Most visitors to the proposed Centre are expected to arrive on foot, largely from Westminster underground station or Parliament Square. This will mean that they will have to walk along the already congested and narrow pavement beside the public entrance to the Houses of Parliament. The Visitor Management Strategy has measured the numbers of users of Victoria Tower Gardens in May and September, the relevant months related to parliamentary recess dates. However, measurements of visitor numbers in the Royal Parks suggest that in July and August there are nearly twice as many parkland visitors as in May and September.
14. Paragraph 2.4 of the applicant's Visitor Management Strategy (December 2018) states that Victoria Tower Gardens *"currently has a range of programmed activities as well as supporting a wide range of visitors through the day. These include tourists taking a break from sightseeing in nearby Westminster, as well as many workers on their lunch breaks. The park is also well used by residents from the area and is especially popular with dog walkers. The playground is an important feature and provides playing space for the local children. Any proposals for Victoria Tower Gardens North will need to maintain access for these users, and ensure continued future use."* But the proposal before the inquiry misunderstands how the Gardens function as a totality, and so fails to ensure their continued future use as a small but important park. The London Parks & Gardens Trust and The Gardens Trust are certain that this proposed insertion into Victoria Tower Gardens of a new building with no connection with parkland would inevitably detract from future public enjoyment of this gentle natural place and is contrary to the intentions of the originators of this park. It is contrary to the best interests of the public at large, despite the importance of the proposed memorial. It should be refused planning permission.