

**Proposed Holocaust Memorial and Learning Centre, Victoria Tower
Gardens**

APP/X5990/V/19/3240661

Proof of evidence

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1. Introduction

1.1 Qualifications and experience

I have been architecture critic of The Observer since 2010. I was formerly architecture critic of the Evening Standard and the Daily Telegraph, director of the Architecture Foundation and editor of Blueprint magazine. I have written on the architecture and planning of London in my book *Slow Burn City*, published by Picador in 2016. I have a degree and a diploma in architecture from the University of Cambridge. In 2018 I received an honorary doctorate from the University of East Anglia and an award for an Outstanding Contribution to Urban Design from the Urban Design Group. In 2019 I received an Award for Urban Design from the Westminster Society. I have received a number of other awards for my writing.

1.2 Declaration

The evidence which I have prepared and provide for this appeal reference APP/X5990/V/19/3240661, in this proof of evidence, is true and I confirm that the opinions expressed are my true and professional opinions.

1.3 Instruction

I was requested to offer this evidence by Save Victoria Tower Gardens, on the basis of my interest in this project and previous writing about it. I rarely give evidence in this way: my reason for doing so on this occasion is that I feel strongly about the issues at stake. I believe that there is danger of a project proceeding that is unworthy of its profoundly important subject, and damaging to its exceptional and significant setting.

1.4 Scope of evidence

My evidence will focus on the design quality of the proposals, whether they are “outstanding or innovative” as set out in NPPF para 131, whether they would cause substantial harm to the significance of the surrounding high value heritage assets, and whether the public benefit of the designs is sufficient to outweigh that harm (see NPPF 193-196).

2. Policy context and considerations

2.1 Policy context

NPPF para 124 states that “the creation of high quality buildings and places is fundamental to what the planning and development process should achieve.”

NPPF para 127 makes a number of requirements for the contribution a development makes to its surroundings: that it should function well, add to the overall quality of the area, be visually attractive, be sympathetic to local character and history, optimise the potential of the site, sustain an appropriate amount and mix of development, and create places with a high standard of amenity for existing and future users, and that do not undermine quality of life.

NPPF para 130 states that “Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area”.

NPPF para 131 states that “great weight should be given to outstanding or innovative designs ... so long as they fit in with the overall form and layout of their surroundings.”

NPPF paras 193 – 196 stress the importance of avoiding harm to the significance of heritage assets, and the importance of clear and convincing justification where harm is done. Substantial harm should be “wholly exceptional,” and must be refused unless it “is necessary to achieve substantial public benefits that outweigh that harm or loss”. If the harm is less than substantial it should be weighed against the public benefits of the proposal.

2.2 Key considerations

The key considerations are therefore whether:

- the proposal adds to the quality of the area
- the design is outstanding or innovative
- substantial or less than substantial harm is done
- the public benefits outweigh the harm.

3. Victoria Tower Gardens – existing character and appearance.

3.1 Surroundings of VTG

Other witnesses will speak in more detail on the surroundings of the site. However, it is clearly of exceptional national and international importance, on the edge of a World Heritage Site, with a number of high grade listed buildings in close proximity.

3.2 Character of VTG

At the same time Victoria Tower Gardens has distinct and important characteristics. It is a relatively intimate, informal and quiet space whose qualities are all the more valuable for the contrasts they offer with nearby national monuments and busy tourist sites. Part of its attraction is in its simplicity – its flat areas of grass framed by its lines of mature plane trees. It invites users to occupy it casually, in whatever way they wish. It has a natural quality: this is certainly an illusion, as it was formed on made ground on top of former working structures, but it is nonetheless an important aspect.

4. Design quality of the proposals and their impact on their setting

4.1 Confusions in conception

The quality of architecture usually reflects the quality of thinking behind it.

In this case the subject is clearly of enormous importance. The site is outstanding and significant. Three exceptional design practices have worked on the project. All are undermined by weaknesses in the thinking behind it. The result is a proposal that will damage the existing gardens without creating a memorial worthy of its theme.

The weaknesses and confusions in conception include:

- Why is there both a memorial and a learning centre? What does the latter contribute that is not already well-served by the Imperial War Museum's Holocaust exhibition, about a mile away?
- If there are to be both a memorial and a learning centre, why was this site chosen, which is too small to accommodate both uses, and where the new uses are likely to be in conflict with each other, with existing uses of the gardens, and its natural ecology?
- The decision to combine a memorial and a learning centre in a single architectural object has practical consequences, such as security and access considerations, which conflict with both the character of Victoria Tower Gardens and the potential for creating a memorial that is both impactful and contemplative.

- There seems to be little profound thought about what it means to create a Holocaust Memorial in this time, about 80 years on from the Second World War, and in this country. There should be good answers to these questions, but there doesn't seem to be a serious attempt to find them, beyond a well-intentioned wish that it would be good to commemorate the Holocaust in some way. There is little sign of a strong guiding idea of the kind that is characteristic of the most successful memorials.

4.2 Flaws in the design

These flaws in conception have led to the following flaws in the design:

4.2.1 The proposed memorial and learning centre are too large to go on this site.

Victoria Tower Gardens is a small, intimate and informal public space. While it might be possible to place a memorial there on its own, the inclusion of the learning centre, with its associated needs for security, bag check etc, as well as the likely and hoped-for footfall of visitors, creates a conflict between the proposal and the site.

As a consequence, considerable financial and creative expenditure goes into concealing the true scale of the project. It is a perverse use of resources: in a different location the memorial could be proud of its scale and the investment it represents. It is right that a work of this importance should make an impact, but the choice of site requires much of it to hide underground.

The power of the memorial's forms is also reduced by the number of different elements crowding in on it. It would surely be more effective in a less cluttered and constricted setting.

The efforts to minimise the impact on the gardens are not successful: the area of green space is reduced and its character irrevocably changed. It will not be possible to be in the gardens, and not be strongly aware of the presence of a large and busy installation. The applicants rightly praise the "powerful simplicity" of the gardens (DAS 4.2.2, p105): it is precisely this quality that will be lost.

When grass is placed on top of a roof, as here, it has a different quality to turf laid directly on ground. People are aware of it. It makes the garden feel more contrived, less natural-seeming. This quality of contrivance is not always negative, but in this context it will completely change the existing atmosphere of the garden.

The current qualities of the garden will therefore be lost. It will become a completely different kind of place. The designs do not "fit in with the overall form and layout of their surroundings" (NPPF 131). They do not "add to the

overall quality of the area,” and are not “visually attractive [or] sympathetic to local character and history”. They do not “optimise the potential of the site.” In significant ways they “undermine quality of life.” (NPPF 127)

I believe that these changes constitute “substantial harm” to the significance of the surrounding heritage assets as a result of placing this flawed and over large development within their setting, rather than merely “less than substantial harm.” (NPPF 193-196)

4.2.2 The parts - both the spaces and the objects - don't relate to each other.

4.2.2.1 Spaces:

The applicants state that “memorials are most successful when they are contextualised in the history they represent” (DAS 4.1.2 p92). This is highly debatable: the Vietnam Veterans Memorial in Washington DC, the Cenotaph in Whitehall, and a large number of war memorials in northern Europe all make a powerful impact without the help of learning centres. The Memorial to the Murdered Jews of Europe in Berlin does have a relatively small learning centre, but it is possible to experience the memorial profoundly, as many people do, without visiting the centre.

A learning centre and a memorial offer very different forms of remembering. They are different in experiences and mood. A memorial is typically quiet and reflective, where visitors develop their own thoughts and emotions. A learning centre usually includes recorded sound and moving images; it directs your thoughts. A memorial tends to use natural light for its effect, a learning centre tends to be an enclosed black box with artificial light. They typically entail different types of circulation: a memorial usually allows visitors to move freely in and around it, in multiple directions; a learning centre imposes a linear route.

Memorials are usually not ticketed, but allow people to approach them unhindered. In this case the combination with the learning centre destroys such openness. It also fences off a significant part of the gardens from everyday use.

It is of course possible to have spaces of different moods in the same complex, but it requires some architectural manoeuvring to make the transition from one to the other. Lack of space makes this more difficult: the danger is that the memorial will function as a portico to the learning centre, a place of transition rather than one where you pause and contemplate. The progression from one to the other is likely to be abrupt.

The choice of site necessitates the retention of the children's playground. It is unusual to have such a thing next to a major memorial of international significance, for the obvious reason that the noise and activity of child's play creates an opposite mood to that of solemn remembrance. There could

conceivably be something powerful about bringing the two together, in witnessing the joy and energy of young life alongside a memorial to the dead. But this combination of uses requires a level of architectural invention and skill that is not evident here. The playground is simply placed next to the memorial, as a somewhat awkward requirement of the brief and location.

Thus there is a linear sequence, in quick succession, of playground-pavilion-court-memorial-learning centre-mound-gardens, resulting in rapid swings of atmosphere and use. There is little apparent attempt either to reconcile these elements, or to make a virtue out of their contrasts.

4.2.2.2 Objects:

Adjaye Associates and Ron Arad Architects have strongly contrasting architectural styles and personalities. Here the memorial and the entrance pavilion take very different approaches: the memorial uses jagged and irregular planar forms in bronze, while the pavilion is geometric and stone-faced. The landscape style of Gustafson Porter + Bowman is something else again.

There is also powerful and distinctive existing architecture on and near the site – especially the Buxton Memorial Fountain and the Palace of Westminster.

The use of the two new and contrasting styles exacerbates what was in any case a challenge with this project, the potentially cacophonous combination of different types of architecture.

I do not believe, in general, that old work is best respected by new work that copies it. There should however be some reciprocity between new and old, some way in which form, proportion or material acknowledge and complement each other. The relationship of different elements should be cohesive.

In this case the pavilion and memorial introduce two completely new architectural languages, that have little meaningful relationship to each other, nor to the existing structures, nor to other elements such as the details of the court and landscaping. Again, these elements are simply juxtaposed, with little apparent attempt to achieve a coherent whole. The relationships look accidental rather than willed.

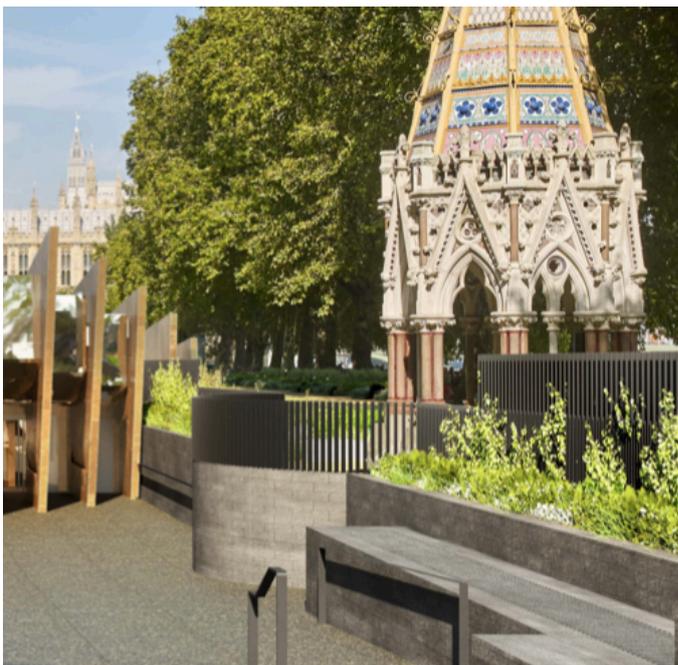
The handling of the Buxton Memorial Fountain is awkward. As with the playground its retention looks like an unfortunate expediency. The much greater size of the proposed memorial makes the Buxton fountain look incidental, a piece of flotsam on the wave of the new work.

While the bronze fins do in some ways echo the vertical rhythms of the Palace of Westminster, other forms and details bear no obvious relationship to surrounding buildings.



View from Lambeth Bridge

The image at DAS Addendum 2.2, p15, “View from Lambeth Bridge”, shows the disparate nature of the elements quite clearly. It looks like an accidental accretion of several objects and surfaces, rather than something intended and co-ordinated.



Detail of Courtyard

In the image at DAS Addendum 2.3, p. 30, “Detail of Courtyard”, you see an exceptionally large number of materials and forms in close proximity – the bronze and stainless steel of the memorial, the stone paving and retaining walls of the courtyard, metal fencing, handrails, planting, and the multiple colours, materials and decorative forms of the Buxton memorial. In the background is the Palace of Westminster, with its stone structure and lead roofs. Some forms in this ensemble are smooth, some jagged, some organic.

Once again, it is hard to see any meaningful attempt to compose, integrate or harmonise these elements, or to make a virtue of their differences. They are merely placed alongside one another.

For these reasons I do not believe that the proposals are “high quality” or “outstanding” or that they will “improve the character and quality of the area”, as set out in the NPPF.

4.2.3 The designs are generic.

The most powerful memorials are singular responses to singular situations – for example the Vietnam Veterans Memorial in Washington DC, the Cenotaph, The Memorial to the Murdered Jews of Europe, and the Judenplatz Holocaust Memorial in Vienna. Their makers thought deeply about the meaning and location of each work, with the result that they are like none other previously constructed. In some cases they are not confined to a single location, such as the “stumbling stones” that the artist Michael Friedrichs-Friedländer places outside the last known voluntary residences of Holocaust victims. In other cases they may be temporary and performed, rather than permanent and constructed, as with “We’re here because we’re here”, by Jeremy Deller and Rufus Norris, in which 1400 volunteers dressed in First World War uniforms and appeared silently at railway stations.



Vietnam Veterans Memorial



Cenotaph



The Memorial to the Murdered Jews of Europe



Judenplatz Holocaust Memorial



“Stumbling Stones”



“We’re here because we’re here”

There is insufficient sign of comparable thought with the UK Holocaust Memorial: what does it mean to build this memorial in this country, where the Holocaust did not take place but which was deeply affected by it? How does the memorial speak to this country’s role at that time in history, and to people in this country, whether those who arrived as refugees or were already here, or to their children and grandchildren? How does this memorial fulfil its role of remembering LGBT, Roma and other victims, as well as the Jewish Shoah?

In the absence of profound thinking on such questions the designs resort to more generalised expressions of anguish or solemnity, whether Arad’s jagged shapes or Adjaye’s more muted form. Both are valid approaches, but neither are particular to this situation. The opportunity has been lost to create a truly exceptional and memorable work.

In this context I would note Arad and Adjaye’s 2014 competition entry for Canada’s National Holocaust Monument in Ottawa. As some people have pointed out, there are similarities with the London proposals: it too was based on narrow passageways between 23 irregular vertical fins. I don’t in principle oppose architects’ and artists’ practice of taking an idea from one project to another. However, a strong design would meaningfully transform such an idea in response to the different cultural and symbolic aspirations of another project. I don’t see such a transformation happening in this case, although there are some modifications between the Ottawa and London schemes in response to changes in the different physical conditions. This lack of transformation or reinterpretation reinforces the impression that the design of the UK Holocaust Memorial and Learning Centre is a generalised

response to the horrors of the Holocaust, rather than one that responds to its time and place.



Proposal for Canada's National Holocaust Monument

It should also be noted that successful memorials such as those listed above, being guided by a strong idea, tend to employ a limited range of materials, forms and devices. There is little that is extraneous, superfluous, or expedient. This quality contrasts strongly with the multiplicity of ideas, elements and materials in the UK Holocaust Memorial and Learning Centre.

At different points in the Design and Access Statement reference is made to, for example, the Covenant of the Pieces, the tunnels at the Wailing Wall (DAS 4.1), the number of countries in which Jewish communities were destroyed, the religious significance of the colour blue (DAS 4.4.5), the use of stones to memorialise (DAS 4.2), and the use of dark and light to symbolise the “dark realities of the Holocaust” and to give “a stark and powerful reminder of hope through the darkness.” (DAS 4.7.3)

Any one or two of these themes, if developed with commitment, might be a strong basis for a memorial project. In this case none of them seems to be explored or followed-through in depth before moving on to another symbol or reference. This multiplicity weakens rather than strengthens the project.

There are similarly multiple materials – stone, bronze, stainless steel, glass, various types of planting and hard landscaping – which are all of them high-quality and potentially attractive but which don't necessarily gain from being used in combination. As noted above there are multiple forms and styles. Again, more is not better.

To make these points clearly I would like to compare the proposed UK Holocaust Memorial and Learning Centre with the successful memorials listed above. If we take, for example, the Vietnam Veterans Memorial, we will see:

- a strong guiding idea, that the memorial is for ordinary soldiers and ordinary visitors, that it is about memory and reflection rather than glorification
- this idea is realised in a few simple design decisions: recessing the memorial into the ground; the inscribing of names of the dead into a wall that reflects living visitors, and where the names can be touched by them. There is a limited range of materials and motifs
- there is a simple but eloquent relationship to the surroundings of the Washington Mall, such as the obelisk of the Washington Monument
- there is very little that distracts from the guiding idea. There are no superfluous architectural devices. There are few elements that are there for expedient reasons; where they do occur they are subordinate to the overall conception and experience.

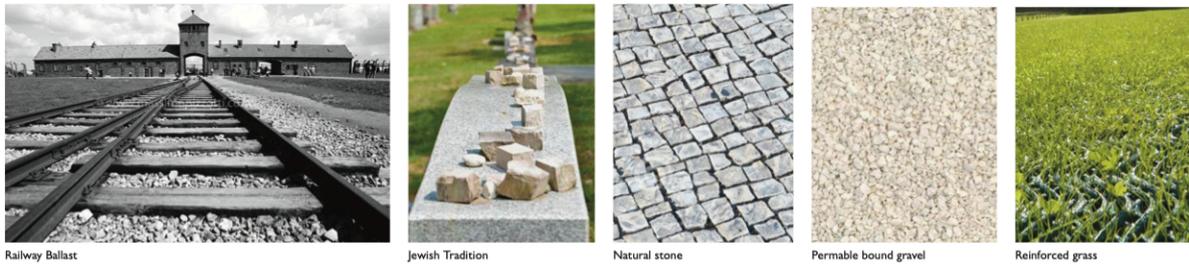
An analysis of the other memorials listed would reveal similar qualities. I don't believe they can be found in the proposals for the UK Holocaust Memorial and Learning Centre.

4.2.4 The open spaces are also generic.

Although the courtyard is described as a “unique contemplative space,” (DAS 4.5.2) I can see nothing unique about it. It looks like the sort of high-specification public realm you might see in a well-resourced commercial development. In the Design and Access Statement comparisons are made with the approach to the Taj Mahal in Agra and the gardens of the Palais Royal in Paris (DAS 4.4.1 and 4.5.1). These comparisons seem to be redundant: the court would be nothing like these spaces. It would be completely different in scale, setting, character and use.

The landscaping of the gardens in general is, again, of a non-specific kind. It could be anywhere. Its design shows no particular interest in the nature of the space now, nor does it rise to the potentially interesting idea that the gardens as a whole could become a “Garden of our Nation’s Conscience.” If this idea is seriously proposed, it requires a greater level of intent than is here in evidence. As it is, an important concept is treated in an almost throwaway manner.

I am particularly troubled by the images in section 4.2, “Landscape”, (p.111) of the Design and Access Statement. Under the heading “Materials diagram”, they include an image of railway tracks leading to Auschwitz and another that illustrates the Jewish custom of remembrance through placing stones on a grave or memorial. These are captioned “Railway Ballast” and “Jewish Tradition”. We are then shown examples of stone paving setts, bound gravel and reinforced grass, which are all commonplace materials in contemporary landscaping. The suggestion seems to be that the last three images somehow refer to and honour the first two. If this is the intention they do so in an extraordinarily superficial way.



These details could of course be developed or changed, but their presentation in this way seems indicative of a more general shallowness of thought. This shallowness, and an associated failure to think through the results of decisions, prevent the memorial from being the exceptional work that it should be.

4.2.5 Detailed observations

4.2.5.1 Entrance Pavilion

The entrance pavilion is in itself a dignified and engaging structure. The framing of the view of the memorial on entry could be an effective device. But, as noted above, it is not clear how its formal language relates to any other part its surroundings, both existing or proposed. DAS 4.4.2 argues, in relation to the superseded design for the pavilion, that its shapes reflect “the clear multitude of triangles and circles” in buildings such as Westminster Abbey. This is unconvincing in relation to both the superseded design and the modified one in the addenda – I do not believe such an affinity would be apparent to visitors. There must also be some doubt whether the pavilion’s small floor area can reconcile the logistics of a bag-check with the calm and uncrowded atmosphere appropriate to the approach to a memorial. There must also be some doubt whether there is enough space around the pavilion to handle the crowds in a way that maintains the existing atmosphere of the gardens and the hoped-for reflective atmosphere of the memorial.

4.2.5.2 Courtyard

The courtyard is repeatedly described as “contemplative” with little indication as to how this will be achieved. There is good reason to think that it will not achieve this quality, as it also has to function as a thoroughfare from the entrance pavilion to the memorial and learning centre. It is dominated by circulation, around which seating and planting have been fitted with some difficulty. The “Detail of Courtyard” image reproduced above shows a particularly awkward relationship, both functionally and visually, between a handrail and seating – this is indicative of the more general problem.

4.2.5.3 Memorial

The bronze fins and stainless steel soffits of the memorial could well be beautiful and powerful in themselves. They are however undermined by issues of layout and organisation.

Successful memorials usually allow visitors to find their own journeys in and around them. They allow people to move at different paces, to linger, pause and track back. The multiple staircases, however, do not encourage such experiences: they direct visitors in a single direction and do not offer places to linger. Nor is it clear how the “threshold” space before the learning centre will succeed as “a place of contemplation” (4.6.1.), standing as it does on the through route from stairs to learning centre. In this area no seating or spaces for reflection are indicated on the drawings.

The possibilities of contemplation and lingering are thus repeatedly thwarted. The linear circulation pattern of a learning centre dominates the wandering pattern of a memorial. These problems are compounded both by the necessity of fencing-in the memorial and the depth required for the learning centre. If the memorial were standing on open ground (as was proposed by Arad and Adjaye for the Ottawa memorial) it would be possible to wander about it and through it, and to move freely between experiencing it both close-up and at a distance.

The depth of the learning centre also requires wheelchair users to take lifts, although a ramped exit route is available to them. I would submit that there is little that is spiritual or reflective about a ride in a lift: if the downward passage between the bronze fins is a fundamental part of the proposed experience, wheelchair users will only have access to an inferior version.

4.2.5.4 Learning centre

The Design and Access Statement offers limited information on the spatial qualities and content of the learning centre. This lack is itself problematic: where moving images and static architecture are successfully combined, for example in Elmgren and Dragset’s Memorial to the Persecuted Homosexuals under National Socialism in Berlin, the integration of the two is fundamental. It is unacceptable that such a crucial part of the proposal should still be so vague in its details.



Memorial to the Persecuted Homosexuals under National Socialism

4.2.5.5 Landscape

Much of the landscape is thoughtful and of high quality, as would be expected of Gustafson Porter + Bowman, albeit (as mentioned above) generic. In places, however, planting seems to be used as infill or padding, a way of negotiating awkward architectural encounters rather than contributing to an overall vision. This is particularly true at the southern end of the site, where it becomes fragmentary, with piecemeal areas of planting used (for example) to separate the playground from general circulation.

I am not convinced by the ha-ha at the edge of the raised mound, which is proposed for safety reasons. In practice I believe it would create an unappealing dead zone, that would negatively interrupt the experience of the gardens and of the memorial.

4.3 Quality, public benefit and harm of the proposals

For these reasons I do not believe the proposals to be “high quality”, “outstanding” or “innovative”, as set out in the NPPF.

I do not believe that the proposals constitute the “substantial public benefit” that must “outweigh” substantial harm (NPPF 195).

The question of “public benefit” goes beyond design alone, to the principle of building a memorial and learning centre at all. Design, however, is highly relevant, as it is integral to the success of the memorial: whatever benefit might come from the memorial will be severely weakened by compromised design.

The issues of public benefit also raise the question whether the objectives of the memorial would not be better achieved on another site. For the reasons I have outlined, I believe that they would.

5. Conclusions/Summary

I support the principle of ensuring that the Holocaust continues to be fully remembered in the future, although it should be questioned whether a single architectural complex is necessarily the best way to do this. Distributed and non-architectural forms of remembrance, like the Stumbling Stones, might be more effective.

While I feel that it might have been more powerful to remember the Holocaust in significant locations across the country, I can see the case for building a memorial in the political heart of the country, Westminster.

I believe that a memorial to the Holocaust, if it is to be built, should be in some sense impactful. It should not fade into the background.

I can see the value, in some situations, of learning centres.

I have a high regard for the design practices working on this project.

I therefore believe that many of the individual decisions behind this project can be supported. The accumulation of these objectives, however, does not lead to a successful outcome where this combined proposal is concerned.

In this case a flawed conception has led to a flawed proposal. The decision to place both a memorial and a learning centre on a sensitive and constrained site, with the security, circulation and other facilities that they require, would radically change the site's appearance and character. This decision also leads to compromises in the design of the memorial itself, and weakens its architectural power.

There appears to be insufficiently profound thought on the meaning and significance of building such a memorial in this place and time. The designs use generic motifs. They lack the singular and specific quality of the best memorials. The many different elements, spaces and surfaces of the proposal would create a confused and incoherent environment. The "contemplative" quality promised by the applicants would be hard to find.

I believe that these proposals would therefore cause substantial harm to the significance of the surrounding heritage assets by having markedly adverse impacts on their settings. They do not offer a public benefit sufficient to outweigh either "substantial" or even "less than substantial" harm. They do not achieve the "outstanding", "innovative" or "high quality" levels of design required by the NPPF and fail to "improve the character and quality of the area"

Sometimes it is good to recognise when something is not working, step back, reappraise, and take a new direction. I believe that this is the case with the UK Holocaust Memorial and Learning Centre. Its brief and site cannot be reconciled without significant compromise to both. The resulting designs are unworthy both of the aspirations of the memorial and of the location.

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