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**Rebuttal of Proof by Rowan Moore**

**by Professor Robert Tavernor**, *BA, DipArch, PhD, RIBA*

Town and Country Planning Act 1990, Section 77; Town and Country Planning (Inquiries Procedure) (England) Rules 2000

Call-in Inquiry into the Proposed Development of the United Kingdom Holocaust Memorial and Learning Centre located within Victoria Tower Gardens, Millbank, London, SW1P 3YB

Local Planning Authority Reference: 19/00114/FULL

September 2020

**Planning Inspectorate Ref: APP/X5990/V/19/3240661**

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**1.0 Introduction**

1.1 I have prepared this Rebuttal Proof on behalf of the Applicant and in relation to Mr Rowan Moore’s Proof of Evidence prepared on behalf of Save Victoria Tower Gardens.

1.2 Please note that I have not sought to rebut all areas of disagreement between us, and my lack of mention of other matters raised should not be construed as my implicit agreement to them.

**2.0 Rebuttal to Proof of Evidence of Rowan Moore**

2.1 Mr Moore is a renowned architectural critic with considerable experience assessing the quality or otherwise of architectural designs nationally and internationally. His evidence is compatible with his expertise and focuses on whether the UKHMLC design proposals ‘*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 193-1960)’*. (RM Proof, para 1.4) His ‘Key considerations’ stem from this, 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*. (RM Proof, para 2.2)

2.2 Mr Moore addresses ‘*Design quality of the proposals and their impact on their setting*’ in section 4 of his proof, where he states unequivocally that: ‘*Three exceptional design practices have worked on the project*’. (RM Proof, para 4.1) The established quality of the design team, comprising architects and landscape architects of international repute undoubtedly enjoy a world-class reputation, and rightly so. Their combined talents are key to the success of this high-profile project. Led by architect Sir David Adjaye, they won an open architectural competition, which – as may be expected – attracted a global response from leading designers, and the collaborative winning team (comprising Adjaye Associates, Ron Arad Architects and Gustafson, Porter and Bowman) were praised by the judges for their approach: their design received high praise from professionals and public alike.

2.3 It is therefore somewhat surprising – even shocking – to read the sentence that follows Mr Moore’s approbation of the ‘*three exceptional design practices*’ that: ‘*All are undermined by weaknesses in the thinking behind it*’. (RM Proof, para 4.1) Can all three ‘exceptional’ teams of professionals, independently and collaboratively, really have been duped into accepting a faulty brief for the wrong site? This is the thrust of Mr Moore’s proof that follows, and it lacks credibility.

2.4 According to Mr Moore there are four ‘*weaknesses and confusions in conception*’, which ‘*include*’:

[1] *- 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?*

[2] *- 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?*

[3] *- 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.*

[4] *- 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*. (RM Proof, para 4.1, pp. 4-5)

2.5 In relation to Mr Moore’s four points, the co-chairs of the UK Holocaust Memorial Foundation, the Rt Hon Ed Balls and Rt Hon Lord Pickles explain clearly in their joint Proof of Evidence the Foundation’s mission, the purpose and location of the Holocaust Memorial and Learning Centre at Victoria Tower Gardens, and I will not repeat their evidence here. Suffice it to say that it is public knowledge that a cross-party Commission established by the Prime Minister made several key recommendations that directly considered the issues raised by Mr Moore: see the Co-chairs’ proof, paras 37-51; and their conclusions from para 52ff. In January 2015, the Prime Minister’s Holocaust Commission published its report ‘*Britain’s Promise to Remember*’ (CD 5.9). The report included the following recommendation, which was accepted by the Government for “*A striking and prominent new national Memorial*”. The decision to site the Memorial in Victoria Tower Gardens was made by Prime Minister David Cameron and announced to the House of Commons on 27 January 2016 (Co-chairs’ proof, Annex G). The decision for a combined memorial and learning centre located at the Victoria Gardens Site (‘VTG’) was affirmed by the two subsequent Prime Ministers, May, and Johnson.

2.6 The competition-winning design led by Sir David Adjaye achieves ‘*a striking and prominent*’ memorial and includes a related learning centre. This is a direct response to the Commission requirement ‘*that a Memorial on its own is not enough and that there must be somewhere close at hand where people can go to learn more*’ (Co-chairs’ proof, para 40). To achieve such a bold and significant brief within the constraints of VTG was certainly challenging. I find the designs and written responses of Sir David Adjaye (see his account of the core objectives at p. 23 of his proof), Mr Asa Bruno (of Ron Arad Architects) and Donncha O’Shea (Gustafson, Porter and Bowman) compelling. Mr Greenberg outlines in his proof the potential of the learning experience that starts with the Threshold space (Greenberg proof, p. 14ff.). He describes a powerful journey.

2.7 Mr Moore thinks otherwise, asserting that the alleged flaws in conception have led to flaws in the design. (RM Proof, section 4.2) Fundamentally, he believes that the Adjaye/Arad design lacks ‘*profound thinking*’ and the ‘*opportunity has been lost to create a truly exceptional and memorable work*’. He refers to the designers’ use of ‘*generic motifs*’ a potentially ‘*confused and incoherent environment*’. Mr Moore concludes that: ‘*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*”’ (RM Proof, p. 18)

2.8 I firmly disagree. As I aimed to demonstrate in my own proof of evidence, I am sure this exceptional team of designers met the brief – as well as the subsequent challenges that emerged through design development – with their characteristic brilliance. I believe VTG will be enhanced by their design: the raised mound that will cover the learning centre beneath will improve the landscape and spatial experience of the Gardens, providing a memorable vantage point from which to enjoy a new prospect of the Palace of Westminster; the narrow southern end close to Lambeth Bridge will be transformed with improved child play facilities and associated amenities for the general public; and the memorial fins will take a different character and form, with changing amounts of visibility depending on approach. The arrival court, the descent between the fins to the threshold space and progression towards the learning centre – the movement from light to dark, openness to enclosure – will surely be memorable. I anticipate we will all learn and experience something new and worthwhile when we visit the completed UKHMLC. The static memorials to slavery, persecution and emancipation, the theme that already runs through VTG will – because of the UKHMLC – be brought to a powerful visual and experiential climax: their meaning will be enhanced. The visual journeys I provide in my proof around and through the VTG towards the proposals demonstrate that the proposals will be coherent, extraordinarily stimulating, and memorable. This will be an outstanding development that will enhance not harm.

2.9 **In conclusion**, I find that neither the brief nor the design team’s approach to the UKHMLC are ‘flawed’. Considerable thought, research and debate went into defining the design objectives for the UKHMLC at the highest level of government and by reference to a range of experts and politicians of different political persuasions. The finest international team of designers was sought through open competition and a team of truly global excellence appointed, who have responded with characteristic imagination and sensitivity to the brief they were set for this specific site. The proposed UKHMLC will enhance not harm this important site and all that it represents. I therefore strongly disagree with the very basis of Mr Moore’s accusations against the brief and the design outcome, which I believe are unfounded.

Professor Robert Tavernor, 17 September 2020