

## **On behalf of LPGT and The Gardens Trust**

We object to the proposed development on the following grounds:

**Victoria Tower Gardens is a consciously designed landscape**, designed to create a **single unified, public park**, with each of the existing, listed, monuments carefully located as a central part of that design, each with their own space – set within the wider grassed lawns. **It was designed for play and recreation, with its long views framed by trees**, for all to enjoy.

These gardens were created as such, **by Act of Parliament in 1900**. To quote: **'the lands ..... between the new Millbank Street and the new Embankment Wall shall be laid out and maintained ....[and] provided for use as a public garden, open to the public and as an integral part of the existing Victoria Tower Gardens'**.

**The proposed development will significantly change the nature of the park**. They will change it from one **designed for public recreation and relaxation, into a crowded civic space with its large scale monument, plaza and buildings**, divorcing the play area from its grand lawn. **The memorial will occupy a large part of the park, that people have to obtain tickets for**. No longer freely accessible then.

**The proposals are clearly** contrary to the 1900 act, and **numerous Westminster and National planning policies....** This cannot be right.

We object on the basis of **Substantial harm** which will be done to this historically significant public park, play area, and **especially the setting it provides for the Grade II\* Buxton Monument that will be dwarfed by the proposals**.

If approved, this application will severely impact the function, and spacious character of both park, and play area. **It will take up over 25% of its usable, grassed area. This is the space that people actually use on a daily basis**. As well as for national gatherings and events.

**The health and well-being benefits of parks and open spaces** in our densely populated urban areas, are well understood. **The impacts brought about by the change from a public park, to civic space in the light of this evidence, cannot be acceptable**.

The applicant says the harm done to this significant public park is 'less than substantial'. **We disagree**.

We acknowledge Westminster's report concluding the possible loss of the Plane Trees, would mean substantial harm caused to the park as a whole. **However, we have also detailed the impact the proposals will have, on the Park's other Historic and Social Values** very clearly in our Statement of Significance. It seems the applicant **has made some fundamental omissions and errors in their assessment of its significance, and has not even acknowledged many of the park's Values**.

The applicant's conclusion therefore, that the development does 'less than substantial harm', **cannot be correct. The brief for the scale of building and monument in this small space cannot be made to satisfactorily work without causing substantial harm to it**.

**Finally....**

Our Freedom of Information Request **asked for details of the alternative sites, and.... the reasons why they were rejected**, was refused by MHCLG, on the basis as 'not in the public interest'. The omission of **a robust and transparent choice of site** seems to be a large gap in the applicant's EIA process. (Env Impact Assessment)