

**Application for the Installation of a UK Holocaust Memorial and Learning Centre 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**

**Speaking Note by David Lambert, Director of The Parks Agency, MA, IHBC, FRSA**

Further to the submission of my written statement which I understand has been circulated to all parties, I shall be glad to summarise it briefly in this speaking note.

I have set out in the statement my qualifications and experience which I hope explain my interest in this case and the contribution I feel I can make to the decision-making process. Designed landscapes, parks and gardens, and especially public urban parks, have been my business for some thirty years.

In my statement I explain the statutory planning roles of HE and the Gardens Trust with respect to grade II registered parks and gardens. I make the point that HE is not consulted on these and generally leaves commenting on grade II sites to the Gardens Trust and its regional partner trusts. In this case, the grade II garden finds itself in a case also involving grade I and II\* buildings, a WHS, and a high profile development in the capital hence their involvement.

I would like to add that over the years there have inevitably been disagreements between the Gardens Trust as a specialist amenity society and HE as the government advisory body. As you can imagine the Trust often feels HE is not as forceful as it, the Trust, would like; that is natural. But it is a matter of fact that over the years, HE has lost internal expertise on historic parks and gardens and that as a result advice on this specialist area is increasingly provided by staff without specialist knowledge. I see in the HE evidence, a lack of understanding of what comprises the significance of a garden space, for example in focusing on fabric rather than on spatial qualities, and in particular how significance in a public garden derives from how it is used by the public, not just physical structures.

In my statement I give a summary of how memorials have developed and functioned in public parks historically, and I take issue with the idea of VTG as 'a garden of conscience and liberties'. My point is that while public parks have often been chosen for the location of memorials, those memorials have generally been strictly subsidiary to the main function of providing open space for passive or informal recreation. That is the case with the existing memorials in VTG – the main function of the park remains the provision of open space for quiet walking or sitting, children's play and occasional large scale events such as jubilee celebrations, rallies or public meetings.

There are indeed many cases where a park has been created primarily as a memorial (war memorial parks or George V playing fields) but in those cases the memorial is the open space, the provision of that space for formal or informal recreation. My concern is that the Holocaust Memorial proposals will dominate Victoria Tower Gardens not only physically, but also dominate their future use and function.

I would not count myself an expert on planning policy but I do make the simple point that the guidance in the NPPF about building on existing open space is unequivocal. I am sure the inquiry is

looking at this extremely closely but it seems to me that none of the three exceptions in para.97 applies. I take issue with the evidence from Historic England which refers to qualitative improvements in the area of the park not physically harmed by the development as offsetting the loss of open space to the development. This doesn't seem to me to be a test under the NPPF.

I should add that measuring the impact of the development just in terms of loss of open space is not a sensitive or appropriate way to assess harm to a public park. An area of hard paving in front of a new reception building may still technically be open space, but it is not the same as flowing open lawn.

My statement also points out that while the NPPF refers to open space, the kind of space it refers to ('open space, sports and recreational buildings and land, including playing fields') hardly does justice to the quality of VTG as reflected in its multiple designations as a registered historic garden, the setting of the WHS and the setting of both the Palace of Westminster and the setting of the listed memorials within it.

While judgements about harm rely on expert opinion, I have struggled to understand the conclusions of HE that the damage here is less than substantial. I make the point in my statement that from my experience of planning casework over the decades I have no doubt that this proposal is seriously damaging to the fabric, significance and character of the registered garden.

Having watched Mr Dunn's evidence on 4 November I am concerned that – unless I misunderstood – when asked to explain HE's methodology for determining or calibrating harm HE, he replied that in this case they decided *a priori* that the harm was less than substantial so therefore did not apply the tests which were being discussed (2:04 in the video record).

I say in my statement that I take strong exception to Historic England's conclusion (CD 5.36 para. 7.1) that the proposal would amount to 'less than substantial harm'. Rather warily, I make a contribution to your discussions about the much-quoted Bedford judgement. By way of a preliminary, I would like to suggest that the very word 'substantial' unintentionally makes it more difficult to understand that some 'serious' harm is not about substance at all but about the intangibles of space and use.

If we assess significance in a way appropriate to a public garden, which I feel a number of witnesses with backgrounds in historic buildings have failed to do, then I believe that 'very much if not all the significance (would be) drained away... vitiated altogether or very much reduced.' For example:

1. The significance of the view from the south, the long view from the Lambeth Bridge entrance, seems *high* to me. The way in which this view was achieved over several decades is set out elsewhere; it now forms one of London's great designed vistas focusing on the Victoria Tower through a perspective of mature trees and open lawn. The harm caused to the foreground of this view by the memorial, the reception building and its associated hard paving and new landscaping seems *substantial* to me.

2. The garden's significance as a place for informal, even aimless, recreation in the heart of the capital, the tranquillity of its riverside setting, its mature trees and its designed relationship to the Palace, seems *high* to me. The harm to that significance caused by the dominance of a building with

an express pedagogical purpose, and by a large increase in visitors with the express and sole purpose of visiting the learning centre rather than sitting or walking in the garden will be *substantial*.

4. And finally, with regard to the Bedford case, the level of massive excavation and physical upheaval of the soil, the very substance of the garden itself, is indeed, in the words of the Bedford case, 'something approaching demolition or destruction'.

I conclude my written statement by saying that in my long experience, I can think of few more egregious examples of substantial harm, where the park is effectively disembowelled. The demolition and relocation of the grade II gardens at Harlow New Town, or the occupation of the grade II gardens of the Commonwealth Institute with three apartment blocks come to mind, but otherwise, this is a development as destructive of the fabric and character of a small but beautiful registered park as I can recall.