

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

Statement by David Lambert, Director of The Parks Agency, MA, IHBC, FRSA

Most of my professional life has been concerned with the study and conservation of historic parks and gardens. As conservation officer for ten years of the Garden History Society (the GHS), now the Gardens Trust (the Trust), I led the campaign for statutory consultation of English Heritage and the GHS on planning applications affecting registered parks and gardens, which became a requirement under the General Development Order in 1995. In 1993 I was the author of one of the first reports to draw attention to the historic importance of public parks and their vulnerability, and from the mid-90s I was closely involved with the Heritage Lottery Fund's grant programmes for repairing them, until the programme closed in 2018. I have worked on well over a hundred park restoration projects in that time. I have served as an expert adviser to three House of Commons Select Committee inquiries including the public parks inquiry of 1999. As well as the HLF, I serve or have served on garden advisory panels for the National Trust, Historic England, CABE, the World Monuments Fund and Historic Royal Palaces. I am currently a director and trustee of the Gardens Trust but I am appearing here in a private capacity.

Historic England and the Gardens Trust in the planning system

I would like to make two points about the status and role of the Trust in the planning system. When English Heritage, as was, agreed to support the case for statutory consultation, it was specifically on condition that the GHS would assume responsibility for commenting on grade II sites, which EH was not prepared to take on. I had the conversation with the then-director of conservation, Ms Jane Sharman, myself. And so it is that Historic England are not consulted on grade II registered sites such as Victoria Tower Gardens. The Trust is the sole statutory consultee, the only formal provider of expertise on these parks and gardens, their significance and the impact or harm of proposed development. Whilst HE is the expert for many heritage attributes it has neither greater experience nor greater knowledge of grade II historic landscapes.

Secondly, in 2015 the GHS merged with the Association of Gardens Trusts, the umbrella group for county and regional gardens trusts such as the London Gardens Trust (LGT). The new body, called the Gardens Trust, took over the Garden History Society's role as a statutory consultee. It continues to provide expert advice to planning authorities on this specialist area, which is a material consideration, but one on which most planning authorities do not have in-house expertise. The Trust fulfils that duty through a combination of its own staff and volunteers within the network of county or regional gardens trusts, such as the London Gardens Trust (the LGT). As member organisations of the Gardens Trust, these county or regional trusts, work in partnership with it and are authorised by the Trust to respond on its behalf in respect of such consultations— for any further clarification required see [here](#).

Memorials in public parks

In 2014 I wrote Historic England's guidance to War Memorial Parks and Gardens (<https://historicengland.org.uk/images-books/publications/iha-war-memorial-parks-gardens/>) – it is a subject on which I lectured both here and elsewhere in Europe during the commemorations of the first world war. I also wrote a chapter on monuments in public parks in *Sculpture and the Garden*, (Routledge, 2006).

I would like to set the record straight about parks and memorials. There are parks which were designed as the memorial themselves; there are parks which were designed as the setting of a war memorial; and there are parks which pre-existed and which were chosen as an appropriate site for a war memorial.

Public parks in city or town centres have always been viewed as appropriate locations for monuments, from the start gradually accreting a range of sculptural or other memorials. These will generally commemorate royalty, patrons or other local dignitaries and worthies, local or national historic events. Some may have been sculptural, others may have been objects of interest such as geological curiosities, or retrieved objects such as Crimean canon or first world war tanks. Their inscriptions may in addition be encouragements to what were considered at the time virtuous behaviour – patriotism for example, or temperance in the case of drinking-water fountains, or Christian virtues such as charity.

Some war memorials were useful buildings erected elsewhere as urban improvements – hospitals, baths, libraries for example. Where they were in parks, functional memorial buildings were restricted to structures such as sports or other pavilions (such as those of the Sons of Rest), and shelters for seating. They were modest in scale and strictly subsidiary to the park into which they were inserted.

In many cases, a park or garden was created as a memorial in itself, a recognition that open space and fresh air was a fitting legacy of and tribute to those who died to protect their families and their country.

However, there is no precedent for the introduction of a memorial into an existing park which involves this level of intervention – ie major excavation, reconfiguration and domination. It is one thing to build a monument or memorial in a park. It is quite another to treat the park as a convenient space not just for a memorial but for a substantial building, its lawns excavated, its trees put at risk, its existing monuments moved or marginalised.

Ed Balls and Lord Pickles claim (in their proof 8.1) that the park is 'a Garden of Conscience and Liberties,' an unfamiliar and interesting coinage. But the existing memorials and the proximity to the mother of parliaments do not give license for the scale of fundamental disruption proposed now. Yes, the park – like many public parks – contains memorials, but they are incidents in the designed open space, no more. It is primarily a garden, a space for passive recreation and enjoyment; it is not *primarily* a place of memorialisation or conscience. The proposed insertion would fundamentally change its character and function.

Planning policy

I am concerned that this proposal is being pursued by the Secretary of State when it is so clearly in breach of the National Planning Policy Framework. The guidance at para.97 is unequivocal: 'Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use."

As far as I understand, none of these three exceptions applies. I note the response to para.97 in para. 8.8 of the proof of evidence submitted by Mr Goddard (your ref. CD8.34): 'I consider the loss of some existing open space is more than offset by the qualitative improvements to the remainder of the VTG and outweighed by the wider benefits of the UKHMLC.' This does not appear to me to address any of the three exceptions to the unequivocal policy in the NPPF. Para. 97 does not allow a "qualitative improvement" to the remainder of a public park to offset the loss of open space to a new building. Nor can the loss of recreational land be "offset" compensated for by a memorial: a memorial is not a recreational amenity, whatever other public benefits it might have.

Moreover, with regard to para.97, Victoria Tower Gardens is not merely 'open space'. It is a site of national significance as a public park, as signified by its inclusion on the very selective Historic England *Register*, of which there are only some 1660 in the country of which only about 350 are public parks or gardens. The site has significance both in terms of its historic fabric - the trees, walls, memorials - and also in terms of its historic character – its spacious level plane, its uncluttered vista from end to end, its relation to the road, the river and the palace, and above all its long-cherished function as a place for quiet, informal recreation.

I challenge anyone to look at image 7.24 in Sir David Adjaye's proof of evidence and not conclude that this design is a major intervention in this nationally important garden. And a destructive one: destroying the long view from the west, reducing the area of open lawn and reconfiguring circulation to focus on the new building, crowding the existing Buxton memorial and changing a tranquil open space into a kaleidoscope of hard materials, vertical and horizontal,. Sir David may say the development 'intervenes lightly' or 'rests lightly' in the park but his insistence on lightness only draws attention to the opposite: the building's massive presence, the heaviness of its materials and the huge excavations it would require.

Finally, 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'. This is so patently not the case that I despair of HE's emasculated role in conservation. In the light of the much-quoted Bedford judgement, it seems to me that this proposal reaches the threshold of substantial harm, by virtue of being 'something approaching demolition or destruction'. In my long experience, I can think of few more egregious examples of substantial harm, where the park is effectively disembowelled. The demolition and

rebuilding 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 of a small but beautiful registered park as I can recall.