

VICTORIA TOWER GARDENS AND THE HOLOCAUST MEMORIAL AND LEARNING CENTRE

RESPONSE to DLUHC –

Felicity Buchan's PAMPHLET (and covering letter) of 23/2/23

Pamphlet Para 1 **'Commemorate'**

The Memorial would also 'commemorate' post-Nazi genocides, not just all the Nazi mass murders. The Learning Centre (LC) should not be expected to simply 'tell history', or to do so from merely a British perspective. As Sir Richard Evans has pointed out, the proposed mixed objectives would be impossible to do well, especially within the small space of the proposed LC - only ~ 1,300 sq m, as compared with the 5,000 sq m recommended by the Holocaust Memorial Foundation in 2015. Many other Holocaust historians are also concerned about the major constraints on the content of the LC.

Para 2 **'Prominence' and 'such prominence' (covering letter)**

This was a key requirement of the Holocaust Memorial Commission of 2015. The proposed VTG site is not prominent as it is hidden for much of the year by trees and shrubs. There are several more prominent sites than the proposed one, including ones closer to Parliament, that should have been considered and were not – for instance College Green, Parliament Square and Whitehall, as well as even the site of the Parliamentary Education Centre at the north end of VTG.

Para 5 **'All the mature London Plane trees will be protected' and 'additional planting will increase the overall attractiveness'**

This is factually incorrect. At the 2019 Public Inquiry, it was common ground that twenty of the plane trees would have roots cut by the excavations and thus suffer long-term damage. Any plane tree damage would severely impact the attractiveness of the Gardens and outweigh the very minor benefits of the proposed new landscaping or planting. The Planning Inspector concluded that there would indeed be harm to trees which would lead to the 'visual impoverishment' of the Gardens.

Para 6 **The Gardens**

'Our proposals will see improvements to landscaping and accessibility of the gardens'

&

'ensure that ... [the] green space is more attractive and accessible than ever before'

(covering letter)

The area of grass would not be more accessible because it would be drastically reduced and some of it would be turned into a slope, which makes it less accessible eg. wheelchair users. The reduced area of grass would get much more pedestrian traffic than it does now and would wear out quickly – MPs should consider what the lawn in Parliament Square now looks like today, even though it has the benefit of full sunlight!

Para 9

'Take about 7.5% of the current open space' (covering letter) and '7.5% of the gardens' (pamphlet)

The 7.5% figure is an understatement and the reference to current open space is wrong: the area referred to is the enclosed memorial space only, which would be 13.33% of the open space area of the Gardens. The Planning Inspector accepted that 7.5% was an understatement, but did not offer another percentage. The Government later provided a figure of 15% of the green space lost in a Parliamentary Question. The actual percentage of the open space area lost, presented at the planning inquiry by the London Historic Parks & Gardens Trust, would be 16.87% of the total park (which includes for instance shrubberies) and 29.5% of the park's current open space.

'The playground will be improved'

The playground would in fact be reduced in size by 25% and shifted even closer to busy polluting roads. The playground would be separated from the rest of the Gardens (by the Memorial) and unusable when there are large numbers of visitors to the Memorial because it is right beside the entrance and exit to the Learning Centre. The playground and the adjacent café would also be swamped by Memorial visitors passing through it to use the café.

'Make sure that all current uses can continue after the Memorial is constructed'

Current uses of the Gardens would all be severely affected by the presence of a large building and of security guards and an estimated 2-3 million more visitors a year. The inappropriateness of asking park visitors to relax right on top of a Holocaust Memorial has been ignored.

Para 11 Learning Centre

A 'powerful audio-visual exhibition' would be no substitute for the content of the Holocaust galleries in the IWM, less than a mile away. Which would schools choose to visit?

Para 12 Visitors

'0.5 million'

The Gardens would be changed by the presence of not 0.5 million HMLC visitors, but 1 million HMLC visitors according to all previous DLUHC documents. DLUHC also projects 1.5 million additional visitors to the Gardens because of the Memorial, making well over three times as many visitors as at present. And Memorial visitors would all be expected to walk right across the middle of the Gardens' open space to the Memorial entrance just metres from the playground.

Para 14 Security

Security experts have expressed concern that a Memorial in this location would be a magnet for terrorists, the design making it highly vulnerable. The only way to reduce the risk would be to control access to the Gardens, thus further reducing their worth to the many who use them now. Security would always be present at entrances to the park at peak times and on the mound on top of the Memorial, reducing the amenity value of the Gardens.

Para 15 Risk of Flooding

This part of Westminster has suffered from serious flooding in the past. The basement Learning Centre could fill with surface water very quickly if there was the sort of local flash flooding that is predicted to increase in the future, or a sudden river wall breach flood.

Para 16 **Planning Consent**

There is no mention of the fact that the Westminster City Council Planning Committee voted unanimously *on a cross-party basis* to reject the current proposal in February 2020.

Para 18 **Construction**

‘phased ... to ensure that as much as possible of VTG is kept open’

The drawings produced in the *Construction Logistics & Environmental Management Plan* show that only a pitifully small amount of the gardens would remain useable during construction: the area around the Burghers of Calais, the footpath beside the river and, also later on, the shrunken playground at the south end of the gardens.

Para 19 **Cost**

Many critics are concerned that no provision is being made at all for Holocaust education activities via an endowment fund, as was emphasized at length by the 2015 Holocaust Commission.

The capital cost is high and very significantly understated here. The National Audit Office’s criticisms of June 2022 have not been addressed. The capital costs have escalated from £89m (plus contingency of £13m) in 2019 to £102.9m (plus an undisclosed increased contingency) in March 2022. That figure was calculated before any significant inflationary increases or any allowance for a three-year delay compared with the original estimates till projected opening in 2027. Construction inflation has been higher than normal inflation. The capital cost would therefore be likely to exceed £125m. No increases to operating costs of as much as £6-8m have been disclosed since 2019.

SAVE VICTORIA TOWER GARDENS & LONDON HISTORIC PARKS & GARDENS TRUST

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