



To whom it may concern

Re: Planning Application: Ref: 19/00114/Full - Victoria Tower Gardens, Millbank, SW1P 3YB

The London and Middlesex Archaeological Society (LAMAS) promotes London's archaeology, local history and historic buildings. The LAMAS Historic Buildings and Conservation Committee reviews applications for listed building consent and seeks to ensure a sustainable future for vital aspects of London's built heritage.

You will be aware that this proposal has already met with considerable surprise and opposition in a number of quarters, to which we wish to add our own. We wish to register our objection to this proposal, and offer the following comments:

Victoria Tower Gardens is an attractive and well-used small park immediately adjacent to the Palace of Westminster. It is registered at Grade II by Historic England (list entry number 1000845), giving it the status of a designated heritage asset of national importance, and moreover, one of considerable integrity in its appearance. The Gardens also form part of the Westminster Abbey & Parliament Square Conservation Area, as designated by the City of Westminster.

If all that were proposed for this garden were a modest-sized memorial, of which there are already several in the garden, that might be unobjectionable. However, the construction proposed is, in effect, a whole building, incorporating a 'Learning Centre'. The listing description for the Gardens emphasises how 'the central area of the gardens is laid out as open lawn, kept clear of planting to preserve the views'. Paragraph 193 of the National Planning Policy Framework (NPPF) states; 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be)'. It is clear that the aforementioned character of Victoria Tower Gardens would be impacted, and the quality of the views diminished, by the addition of a substantial building with a not-insignificant above-ground presence.

The siting and design of the proposed new building would also have a negative impact on the setting of the Grade II* listed Buxton Memorial Fountain (Historic England List entry number 1066151). Existing views to and from the fountain within the Gardens would be blocked by the 'memorial fins' at the north end of the proposed building. Furthermore, the proposal would result in the obliteration of the path, mentioned in the listing description of Victoria Tower Gardens that forms an axis between the fountain and Dean Stanley Street, tying the Gardens and fountain into the adjacent historic urban grain. The fountain risks becoming a marginalised

element of the Gardens, hemmed in against the riverside by the proposed new building, rather than one of its most prominent and important features.

It appears to us that inadequate consideration has been given to the fact that the vicinity of the Palace of Westminster already suffers from excessive crowds of tourists, a situation with implications for the historic built environment and which the proposed construction could only exacerbate. We are deeply concerned that this much-loved garden could become a space no one can enter without being subjected to a search on the grounds of security.

NPPF Paragraph 190 stipulates that 'Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal'. We contend that the applicant has not paid sufficient attention to the impacts of the proposal on a number of nationally-significant designated heritage assets, and expect that Westminster will draw the same conclusion from its own assessment of the application documents.

It seems perverse in the extreme to wreck a much-valued and traditional green space for this purpose when, a short walk away across Lambeth Bridge, the Imperial War Museum already devotes a whole floor to an entirely adequate Learning Centre - an extensive and informative permanent exhibition on the death camps and the politics that led to them.

We therefore strongly recommend that the application be refused.

Vicki Fox (Hon. Secretary)

LAMAS – Historic Buildings & Conservation Committee 8 February 2019