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)