

# GREATER LONDON AUTHORITY

██████████  
The Planning Inspectorate  
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2 The Square  
Bristol BS1 6PN

**Department: Planning**  
Your reference: APP/X5990/V/19/3240661  
WCC reference: 19/00114/FULL  
Our reference: GLA/5035

Date: 30 January 2020

Dear ██████████

**Town & Country Planning Act 1990 (as amended) (“the 1990 Act”); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008 (“the 2008 Order”)**

**Direction under S77 of the 1990 Act relating to planning application at Victoria Tower Gardens, Millbank, London, SW1P 3YB**

I am writing in support of the proposed development on behalf of the Greater London Authority (GLA).

The GLA Stage 1 report (GLA reference: GLA/5035/01) and letter of 4 March 2019 (GLA reference: GLA/5035/SW) advised that the application broadly complies with the London Plan and draft London Plan, and identifies the issues of non-compliance. A full copy of the Stage 1 letter and accompanying report is enclosed at Annex 1.

This representation is not intended to repeat all the matters raised in the Stage 1 report but intends to emphasise why the GLA supports the development, as well as the matters the GLA requests are dealt with by planning condition or obligation. This letter is intended to be a summary of the key strategic planning considerations to the determination of the application.

## **Strategic planning policy update**

Since the Deputy Mayor for Planning, Regeneration & Skills issued his Stage 1 comments on the application, much progress has been made on the draft New London Plan. On 17 December 2019 the Mayor published his ‘Intend to Publish’ version and sent this to the Secretary of State, along with an itemised list of responses to the recommendations of the Inspectors’ Panel Report. In line with the NPPF, a number of New London Plan policies have gained weight since the Stage 1 and some can now be afforded substantial weight.

## Reasons for support

The GLA considers that the proposal complies with the London Plan and New London Plan, for the following reasons:

1. The provision of a United Kingdom Holocaust Memorial and integrated Learning Centre would result in wide-ranging **educational, cultural** and **societal benefits** to residents of London and the United Kingdom as a whole;
2. The importance of siting of the development adjacent to the UK's pre-eminent building of political power has been robustly demonstrated through the detailed site selection process and the impact on **open space** is outweighed by this consideration, along with qualitative improvements to open space and the wider public benefits;
3. The **design** is of the highest quality, would enhance the quality of the remaining open space and, whilst there would be some **heritage** harm to the significance of the Registered Park & Garden and listed structure, this would be less than substantial and outweighed by public benefits; and
4. Following the submission of further information and subject to mitigation, the application complies with London Plan Policies regarding **inclusive design, climate change** and **transport**.

These are explained in more detailed below.

### **1. Educational, cultural and societal benefits**

New London Plan Good Growth objective GG1 seeks to “build on the city’s tradition of openness, diversity and equality, and help deliver strong and inclusive communities”, whilst London Plan Policy 2.1 seeks to ensure that London retains and extends its global role for education and continues to play a supportive role in the social development of the United Kingdom and it’s network of cities. The provision of a United Kingdom Holocaust Memorial and Learning Centre would support London’s world city status and deliver wide-ranging educational, cultural and societal benefits for London and the United Kingdom as a whole. This is a significant material consideration weighing in favour of approval.

The proposal would be appropriately located within the Central Activities Zone (CAZ) and close to a Strategic Cultural Area, in a highly accessible location. The site is located within an area with a strong ‘state’ character as shown on the London Plan and New London Plan CAZ diagrams (Map 2.3 and 2.16 respectively). This is considered to be an appropriate location for this significant Memorial and the importance of siting the development close to the pre-eminent building of political power in the UK is acknowledged.

### **2. Open space**

The proposal would result in the loss of locally protected open space, both during construction and upon completion, where access would be restricted to approximately 7% of the Gardens. This is contrary to London Plan Policy 7.18 and New London Plan Policy G4, however, the GLA considers that this would be outweighed by the wider qualitative improvements to the remaining open space, as well as the significant educational, cultural and societal benefits of the development.

The location of the Memorial has been subject to a robust and detailed site selection process. The GLA strongly supports the project Mission Statement for the Memorial to “stand as a permanent reminder of

the responsibilities of citizens in a democracy to be vigilant and responsive whenever [democratic] values are threatened". As such, the siting of the development adjacent to Parliament is important to add status to the Memorial and act as a reminder that political decisions have far-reaching consequences.

These considerations, in the GLA's view, outweigh the harm to locally protected open space.

### **3. Design and heritage**

The design concept is well-considered and of the highest quality in terms of form, appearance and materiality, although robust conditions are necessary to ensure that this concept is carried through into the development of the scheme, including maintenance arrangements.

The Stage 1 report sets out a detailed assessment against the NPPF tests and statutory duty relating to impact on heritage assets. There would be some harm to the Grade II Registered Park & Garden and the Grade II\* listed Buxton Memorial Fountain, but this would be less than substantial and clearly outweighed by the public benefits of the proposal.

### **4. Inclusive design, climate change and transport**

In the GLA's Stage 1 comments, further information and clarification was requested with regard to inclusive access to all parts of the development, additional measures to achieve carbon dioxide savings and transport matters.

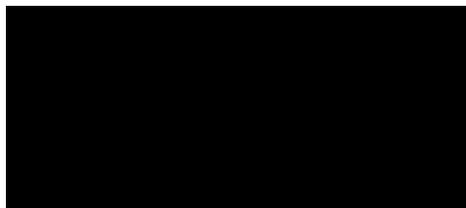
The applicant has responded positively to the Stage 1 comments. Inclusive access has been demonstrated, and further carbon dioxide savings investigated and discounted. TfL has met with the applicant and Westminster City Council highway officers to discuss the transport aspects of the proposal, namely; the coach parking strategy, delivery and servicing, Lambeth Bridge Safer Junction scheme contribution and provision of protective security measures.

The following matters should be secured by condition or S106 obligation as appropriate:

- Future-proofing for connection to a district heating network;
- Coach Parking Management Plan, which includes an alternative CPMP for Millbank South;
- Contribution of £1 million towards the Lambeth Bridge Safer Junction programme to mitigate against the increased pedestrian footfall associated with the development;
- The applicant must provide protective security measures, by means of a S278 agreement with TfL;
- Contribution towards Legible London signage;
- Travel Plan;
- Delivery and Servicing Plan; and
- Construction Logistics Plan.

On the basis of the above material considerations, the GLA supports the application and I respectfully request that permission is granted.

Yours sincerely



[Redacted]  
Chief Planner

cc: [Redacted], Westminster City Council  
[Redacted], DP9  
Chloe Flower, TfL

Annex 1: GLA Stage 1 response  
Annex 2: TfL post-Stage 1 comments