

Petition

House of Lords
Session 2023-24
Holocaust Memorial Bill

Please do not include any images or graphics in your petition. There will be an opportunity to present these later if you give evidence to the committee.
Your bill petition does not need to be signed.

Expand the size of the text boxes as you need.

1. Petitioner information

In the box below, give the name and address of each individual, business or organisation(s) submitting the petition.

London Historic Parks & Gardens Trust

London

Registered Charity: 1042337

Company limited by guarantee registered in England & Wales: 2935176

In the box below, give a description of the petitioners. For example, “we are the owners/tenants of the addresses above”; “my company has offices at the address above”; “our organisation represents the interests of...”; “we are the parish council of...”.

London Historic Parks and Gardens Trust (LHPGT/The Charity) is an amenity society and a registered charity with an interest in protecting the capital's historic landscape based on heritage and amenity value. Its charitable objects are to promote the education of the public on matters connected with arts and sciences of historic garden land and to preserve, enhance and re-create for the education and enjoyment of the public whatever historic garden land may exist or have existed in and around London. LHPGT is affiliated to a national body The Gardens Trust – a statutory consultee in the planning process. The Gardens Trust has formally delegated to LHPGT responsibility for responding to Grade 2 and undesignated historic parks and Gardens in the Greater London Area.

2. Objections to the Bill

In the box below, write your objections to the Bill and why your property or other interests are directly and specially affected. Please number each paragraph.

Only objections outlined in this petition can be presented when giving evidence to the Committee. You will not be entitled to be heard on new matters.

LPG seeks to be heard as a petitioner under House of Lords SO 117 para 2 “as a society or association sufficiently representing amenity, educational, travel or recreational interests”. We believe the interests LPG represents, namely the protection of a designated historic public park, will be adversely affected to a material extent, through loss of historic setting, green amenity space and an irretrievable change of use into a civic space with a quite different purpose.

Victoria Tower Gardens (VTG) is the site selected for the Holocaust Memorial and Learning Centre development. VTG is a Grade 2 listed public park.

The Charity has a duty on behalf of all its members and supporters to protect public parks and gardens, particularly historic ones such as Victoria Tower Gardens within the Greater London Area in accordance with its charitable objects; and as delegated Statutory Consultee. In pursuance of its objects, the Charity has taken an active part in the application for planning permission for the Holocaust Memorial and Learning Centre (“HMLC”) as a Rule 6 party objector, alongside other parties, flagging the 1900 Act as an impediment at the outset of consultation on 4 February 2019 – see a copy of our response to Westminster City Council about the initial planning proposals (drawing attention on pages 2 and 3 at point 2.0) to the wording of the Act:
<https://drive.google.com/file/d/1SZpFZpl8bjnrMkcatPv1HGcRdkAUTRyt/view>

LPG has consistently challenged HM Government over the 1900 Act provisions. First it was a Rule 6 party at the Planning Inquiry. LPG was the organization that took the Department to the High Court following the Minister’s acceptance of the Planning Inspector’s report without due consideration of the 1900 Act provisions. LPG has also given evidence before the House of Commons Select Committee.

3. What do you want to be done in response?

In the box below, tell us what you think should be done in response to your objections. You do not have to complete this box if you do not want to.

You can include this information in your response to section 2 'Objections to the Bill' if you prefer. Please number each paragraph.

At the outset LPG recognizes and endorses the importance of Holocaust education and the representation of Jewish history within Britain and makes no comment on how this can best be achieved. LPG's concern focuses on the Government's current proposals, designed by Sir David Adjaye, a new building for a UK Holocaust Memorial and Learning Centre sited in a park. This structure will occupy an historic public park given in trust for future generations for recreation, while other options such as reuse of existing buildings and other areas in central London (as suggested by the 2015 Holocaust Commission) were never properly considered.

LPG notes the following observations by the committee in the Commons, which it asks this committee to take into account:

- The lack of a full consultation at the site selection stage which would have lent more legitimacy to the final site decision.
- The true cost of this project has not been established. The Government was urged to consider how ongoing costs are likely to be paid for and whether it offers appropriate use of public money.
- Clear proposals should be published which show what steps the Government intends to take around security of any Memorial and Learning Centre. Such considerations ought to be undertaken expeditiously before any planning application is progressed.

LPG would like Clause 2 to be omitted entirely. If the Bill proceeds to its committee stage in the House of Lords, we assume the principle of the Bill will have been approved by the House. Subject to any restriction the House of Lords may approve LPG anticipates the committee will not be able to consider removing the 1900 Act restriction.

On the assumption that Clause is not omitted entirely, LPG has specific requests and suggested amendments to protect this historic park and its use by the public should the Bill proceed:

- A. For a memorial only
- B. Defining the amount of 1900 Act land that can be built on.
- C. A 'sunset clause' which restricts the lifting of the 1900 Act restrictions to what is initially built.
- D. No impact on other historic memorials in VTG, especially the Buxton Memorial which is under threat if the current design proposals go ahead.
- E. No reduction to the size of to the playground or its accessibility.
- F. Preservation of free access to the public park with unimpeded passage or surveillance.

- G. Limits on closure of the park for commemoration days
- H. Governance of the remaining public park land separate from that of the HMLC to secure and sustain the amenity value post construction.

In each case this petition will put forward an amendment and say way why it's needed.

Suggested amendments and justification

A. For a memorial only

LPG asks for this amendment to provide for the lifting of the 1900 Act restrictions only in respect of a proportionate sized Memorial, and not the Learning Centre. This would keep the new construction in keeping with the existing public park.

Suggested Amendment:

Clause 2, page 1, line 18, at end insert "in so far as those paragraphs relate to a Holocaust Memorial limited to a height, width and volume, no larger than the Buxton Memorial."

B. Defining the amount of 1900 Act land that can be built on

This part of the LPG Petition would only be relevant if our Suggestion A is not accepted. The aim is to guarantee that all the parkland not built on for the HMLC is covered by the protections of the 1900 Act. It would limit the amount of land to be built on in square metres.

Suggested Amendment

Clause 2, page 1, line 18, insert after '...otherwise in relation to' and before ' the land described...' the words: "1429 sqm of"

C. Introduce a 'sunset clause' which restricts the lifting of the 1900 Act to what is initially built.

This part of the LPG Petition would only be relevant if our Suggestion A is not accepted. This amendment would prevent subsequent extension into the park beyond the existing footprint of the Memorial and Learning Centre after it is officially opened in Victoria Tower Gardens.

Suggested Amendment

Clause 2, page 1, line 18, at end insert—

"() This section will cease to have effect when the Holocaust Memorial and centre for learning opens."

D. No impact on other historic memorials in VTG, especially the Buxton Memorial which is under threat if the current design proposals go ahead.

The present design is too big and damages the setting of the existing memorials. Indeed, the Bill as drafted does not prevent a design which might have an even greater negative impact on the existing monuments. These amendments would ensure that any future construction would complement the existing designated monuments. LPG supports the Buxton Petition in relation to protecting existing historic monuments and their setting within the park.

Suggested Amendment

Clause 2, page 1, line 18 at end insert –

“provided that any such activities shall not cause any harm to any other memorial in the land described in section 8(1) of the Act, or to the setting of such memorials.”

And “that any construction made possible by this section shall be no larger in height, width or volume than the Buxton Memorial”.

E. No reduction to the size of the playground or its accessibility.

Part of the Park’s history is that it provided one of the earliest areas for children to play with the introduction of a sandpit opened in 1923 through the generosity of the Spicer family. (Playgrounds were developing as a concept in public parks around the turn of the century particularly to provide space for those from deprived communities). There are few open playgrounds within this dense urban London landscape and this area of land should be protected for all future generations to enjoy. The current proposals result in a reduction in the size of the playground and moves it closer to the road through the diminution of the horticultural border. The proposed redesign risks restrictions to children’s access. LPG does not consider this necessary to accommodate the Holocaust Memorial and Learning Centre.

Suggested Amendment

Insert at the end of Clause 2

“Any construction made possible by this section must not result in access to the children’s playground being affected, nor in diminishing its size or moving it closer to nearby roads.”

F. Preservation of free access to the public park with unimpeded passage or surveillance

It is important that the Bill recognises that the character of the garden itself must not be changed. LPG seeks to keep free unimpeded and un surveilled access to the public park. At present, there is no information available showing what security measures will be put in place or whether security barriers of any kind will be implemented. It is important that whatever security is provided, the remainder of the park is left free from surveillance, ticketing or other forms of physical barrier. Further the history of the site was that the park was created to provide access from the nearby buildings to the river – it is vital that this too is protected so that people may enjoy this historic view without any restrictions.

Suggested Amendment

Insert in Clause 2 after the ‘sunset clause’ above:

“In any part of the 1900 Act land not occupied by the construction, public access shall not be impeded by security checks or ticketing.”

G. Limits on closure of the park for commemoration days

We recognise that should either Holocaust Memorial alone or with a learning centre be established in the park we would wish to restrict the number of days the park would be allowed to shut to enable key commemorations – there has been no information about

the intentions of the new centre for these occasions and so we are unable to suggest a suitable amendment but would ask for the Promoter to commit to a reasonable limit.

Insert in Clause 2 after the 'sunset clause' above:

"The park will only be allowed to shut for xx days per year."

H. Governance of the public park to secure the amenity value post construction

This part of the LPG Petition would only be relevant if our Suggestion A is not accepted. The entity created for the Holocaust Memorial and Learning Centre will necessarily be focussed on the educational value of its museum and its remit should not extend further than that. A separate entity is necessary to manage the public park so as to ensure that the use of the land still covered by the 1900 Act is protected for the benefit and enjoyment for the public as park users.

Suggested Amendment

At the end of Clause 2 insert:

"The organisation managing the Holocaust Memorial and centre for learning shall not have any management role in respect of the parts of Victoria Tower Gardens not occupied by the Holocaust Memorial and centre for learning"

Next steps

Once you have completed your petition template, save it and either email it to hlprivatebills@parliament.uk, post to the Private Bill Office, House of Lords, London, SW1A 0PW, or call 020 7219 8261 to arrange a time to deliver it in person.

Petitioner's details

Organisation/group name (if relevant)

London Historic Parks and Gardens Trust

First name(s)

Helen

Last name

Monger

Address line 1

Address line 2

Post code

County

Email

Phone

Who should be contacted about this petition?

Individual above

Another contact (for example, Roll A Agent or other representative)

If another contact, complete the 'main contact's details' section.

Main contact's details

First name(s)

Last name

Address line 1

Address line 2

Post Code

County

Email

Phone