

AtkinsRéalis



UNITED KINGDOM HOLOCAUST MEMORIAL AND LEARNING CENTRE

Environmental Statement Addendum 2026

MHCLG

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EIA Quality Mark

This Environmental Statement and the Environmental Impact Assessment (EIA) carried out to identify the significant environmental effects of the proposed development have been undertaken in line with our commitments as members of the EIA Quality Mark.

The EIA Quality Mark is a voluntary scheme operated by the Institute of Environmental Management and Assessment (IEMA) through our EIA activities are independently reviewed, on an annual basis, to ensure we continue to deliver excellence in the following areas:

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1 Introduction

1.1 Background

- 1.1.1 This document is a second addendum to the Environmental Statement (ES) which accompanied a planning application (Ref: 19/00114/FULL) submitted to Westminster City Council on 7 December 2018 by the Secretary of State for Housing, Communities and Local Government for the proposed UK Holocaust Memorial and Learning Centre (the Scheme) to be located in Victoria Gardens, adjacent to the Palace of Westminster in London.
- 1.1.2 Following submission of the planning application, it was deemed necessary to review the planning application proposals and make a number of design modifications to the Scheme. These amendments gave rise to the need to re-assess the predicted environmental effects of the Scheme and update the ES, which was undertaken in April 2019 in the form of an ES addendum, herein referred to as the Addendum (2019).
- 1.1.3 This latest addendum is required to consider some minor design modifications and any changes to the baseline legislation and policy since the submission of the Addendum (2019).

1.2 The Scheme

- 1.2.1 This ES Addendum forms part of the planning application for the development of the proposed UK Holocaust Memorial and Learning Centre in Victoria Tower Gardens, London. Full planning permission is sought for the construction of a memorial, learning centre, entrance pavilion, large courtyard area and café.

1.3 Summary of design amendments to the Scheme

- 1.3.1 The design modifications have been made to ensure full compliance with the latest building regulations and guidance, they have not changed any of the predicted effects set out in the original ES (2018 as amended in 2019) and Addendum (2019). No design modifications have been required to comply with current planning policy, with the scheme remaining fully compliant as set out in the Planning Statement. The modifications include:
 - Amendments to the skylight;
 - The VTG path has been repositioned;
 - The memorial courtyard levels/landing area amended;
 - The removal of one step from each flight - 12 steps per flight instead of 13;
 - Internal amendments to planform to achieve compliance with 2025 Regulations;
 - A helical staircase with skylight (instead of square staircase); and
 - The exit route gradient has changed and the door has been removed.
- 1.3.2 The above amendments are accounted for in an updated description of the development (Chapter 3 of this addendum).

1.4 Consideration of Options in Response to the House of Lords Select Committee

- 1.4.1 During the passage of the Bill a number of concerns were identified by the House of Lords Select Committee that have been considered. The key assurances and recommendations comprise:
- 1.4.2 **(Assurance 4)** A review of the arrangements proposed for the southern end of Victoria Tower Gardens (VTG), with a view to ensuring an appropriate separation of the playground from other visitors to VTG, including visitors to the proposed Holocaust Memorial and Learning Centre (HMLC). Measures to be considered include:
 - very clear delineation of the boundaries of the playground, using the Spicer Memorial, hedges and other planting to make the playground space clearly separate from the area around the HMLC;
 - ensuring that visitors to the HMLC have no need to pass through the playground; and
 - ensuring that visitors to VTG, whether visiting the HMLC or not, have no need to pass through the playground in order to access either the public toilets or the refreshment kiosk.

- 1.4.3 **(Assurance 8)** Detailed consideration to the question of how easily visitors to the proposed Holocaust Memorial and Learning Centre, and to Victoria Tower Gardens generally, will be able to pass by and view the Buxton Memorial, including considering the location, nature, specification and design of paths, fencing and other boundary treatments.
- 1.4.4 **(Response to Recommendation 1)** The Promoter will look carefully at the proposed design and location of the refreshment kiosk alongside the review (relating to Assurance 4) of the arrangements around the playground.
- 1.4.5 As a result, several potential options have been set out in the Design and Access Statement (DAS) Second Addendum. The DAS Second Addendum outlines each possible change, describing the amendments and provides updated plans that could be attached to the decision letter if the decision maker considers them acceptable and necessary to make the Application acceptable. This approach would allow the decision maker to specify which, if any, changes are required and to impose a planning condition requiring the Proposed Development to be carried out in accordance with the submitted plans, as modified by the relevant supplemental plans.
- 1.4.6 The potential options are set out below. Each topic section within this ES Addendum considers the potential impact of incorporating one or all of the options into the design on the conclusions of the ES. It is concluded that there would be no additional likely significant effects.

Option 1A: Hedge Boundary to Playground
- 1.4.7 An additional section of hedging would be introduced along the pedestrian Thames walkway and around the inner line of the Spicer Memorial and the existing railings along Millbank.

Option 1B: Installation of new gate on Millbank, and full Hedge/Railing Boundary
- 1.4.8 This option would build upon Option 1A by maintaining a fully enclosed playground with a well-defined, 1-metre high, hedge and metal railing. Each entry point into the playground would be gated, including the introduction of a new gate off Millbank. This new dedicated entrance would be clearly signposted, guiding visitors from the street directly to the playground access point.

Option 1C: Full Hedge/Railing Boundary
- 1.4.9 This option would build upon Option 1 by maintaining a fully enclosed playground with a well-defined, 1-metre high, hedge and railing. Each entry point into the playground would be gated, with a difference to Option 1B being that there would be no new gate entrance from Millbank.

Option 1D: Removal of Café Kiosk
- 1.4.10 The café and kiosk would be removed, and the space reduced so as to only accommodate essential services - namely the back-up generator and cycle parking. This change would enable the playground area to increase further southward.

Option 1E: Reorientation of Café Kiosk
- 1.4.11 The counter of the café kiosk would be turned toward the Thames Walkway, to avoid potential queues conflicting with users of the playground adjacent.

Option 1F: Buxton Memorial Widened Path
- 1.4.12 The path surrounding the Buxton Memorial could be widened by 0.5 metres, providing additional space for visitor circulation.

1.5 Structure of the Environmental Impact Assessment

- 1.5.1 The ES comprises five volumes as shown below. This document constitutes Volume 2 of the ES.

1	• Non Technical Summary
2	• Main Report
3	• Built Heritage, Townscape and Visual Impact Assessment
4	• Figures
5	• Appendices

1.6 Summary of amendments to the volumes, appendices and supporting documents

1.6.1 The ES is supported by a range of supporting assessments and documents that are appended to the ES. An updated Built Heritage, Townscape and Visual Impact Assessment (Volume 3) and Transport Assessment (Appendix M) have been prepared to support the findings in this addendum.

1.7 Scope of the Addendum

1.7.1 The scope of this addendum is consistent with that of the original ES.

1.8 Structure of the Addendum

1.8.1 This document is structured in a manner consistent with the ES (2018 as amended in 2019) and provides an addendum for each chapter in the following sections.

1.9 Methodology

1.9.1 The environmental impact assessment methodology adopted in this addendum is consistent with that set out in the ES (December 2018 as amended in 2019).

2 The Site and surrounding environment

2.1.1 Chapter 2 of the ES (2018 as amended in 2019) is not altered by this addendum.

3 Project Description

3.1.1 This section outlines the updates to Chapter 3 of the ES (2018 as amended in 2019).

3.2 Overview

3.2.1 The general layout of the Scheme has not altered, however the Scheme Plan in

3.2.2 Figure 3-1 has been updated to reflect the new design of the Entrance Pavilion and amendments to the skylight, refer to Figure 3-2.

Figure 3-1 - Scheme Plan



Figure 3-2 – Updated Scheme Plan (April 2019)



3.3 Memorial and learning centre building

3.3.1 The general layout of the Scheme has not altered since the Addendum (2019).

3.4 Landscaping

3.4.1 The landscaping of the Scheme has not altered since the Addendum (2019).

3.5 Access and Transport

3.5.1 Access and transport to Victoria Gardens has not altered as a result of the amendments.

3.6 Construction

3.6.1 Construction of the Scheme is currently planned to commence in Q2 2027 and is due to be completed in Q2 2029. Landscaping will be completed by Q2 2030.

Construction method

3.6.2 The construction method has not altered since the Addendum (2019).

Construction Logistics

3.6.3 The amendments do not result in a change to the construction logistics.

Protection of trees

3.6.4 The protection of trees for the Scheme has not been altered as a result of the amendments.

Community engagement

3.6.5 Community engagement for the Scheme has not been altered as a result of the amendments.

3.7 Operation

3.7.1 Details on the operation for the Scheme have not been altered as a result of the amendments.

Ticketing

3.7.2 Details on ticketing for the Scheme have not been altered as a result of the amendments.

4 Alternatives

4.1.1 There are no significant changes to Chapter 4 of the ES (2018 as amended in 2019) as a result of this addendum. The only change is the Imperial War Museum's new Holocaust galleries which opened in 2021 and which was taken into consideration in the Inspector's Report into the application in 2021.

5 Approach to the Assessments

5.1.1 There is no change to the approach set out in the ES (2018 as amended in 2019) as a result of the design amendments.

5.1.2 However, Since the previous assessment there have been changes, for some of the topic areas, to the data sources used and further surveys have been completed. These changes are included in Table 5-1.

Table 5-1 - Topic baseline information sources

Environmental topic	Desktop Sources		Surveys	
Biodiversity	✓	- A desk study was undertaken in April 2017 and updated in October 2018 and August 2025 to obtain ecological data. - In October 2018 and August 2025 Greenspace Information for Greater London (GiGL) was contacted to obtain ecological data including records of non-statutory designated sites, records of legally protected and notable species (fauna and flora). - The Multi-Agency Geographic Information for the Countryside (MAGIC) was used to search for designated sites of nature conservation importance, notable habitats and the presence of waterbodies.	✓	- Two site visits were undertaken in April 2017 and October 2018 by an ecologist to conduct a Phase 1 Habitat Survey. - Additional survey was undertaken in August 2025 to update the Phase 1 Habitat Survey.
Water Quality and Flood Risk	✓	- Review of the Environment Agency National Flood Risk Assessment 2 (NaFRA2) data including the Flood Map for Planning. - Review of the Environment Agency's Catchment Data Explorer (2018). - Consultation with the Environment Agency. - Use of information from WSP UK Limited including an outline drainage strategy (2018), river wall visual condition survey (2018) and ground movement assessment (2019).	✗	No surveys undertaken.
Traffic and Transport	✓	- A review of bus, National Rail and London Underground service frequencies. - A review of pedestrian routes and crossing facilities from the site to local public transport nodes (bus stops and rail stations), together with a review of the local cycle network.	✓	- A series of pedestrian and cycle counts (27th May 2017, 29th May 2017 and 13th September 2017). - Kerbside activity surveys (30th September to 3rd October 2017). - A Public Transport Accessibility Level (PTAL) assessment of the site. - New Pedestrian count data was collected in May 2025.

5.1.3 In line with the EIA Regulations 2017, the ES (2018 as amended in 2019) considered significant adverse effects of the Scheme on the environment deriving from the vulnerability of the Scheme to risks of major accidents and/or disasters relevant to the Scheme. Since then, the major events shortlisted for further consideration has been reviewed, and as a result of further studies, amendments have been made to the reasons for consideration in relation to the Flood defence/reservoirs major events included in Table 5-2 and the mitigation.

Table 5-2 - Major events shortlisted for further consideration

Major Event	Reason for Consideration	Potential Receptors	Consequence	Mitigation
Engineering Accidents/Failures				
Flood defence/reservoirs	The Flood Risk Assessment considers the risk of flooding should a designated reservoir or flood defence fail. The Scheme is adjacent to the River Thames tidal flood defence wall. This wall in combination with the Thames Barrier provides a very high standard of protection, but there is a residual risk of flooding to the site in the unlikely event of defence failure. A ground movement assessment carried out by WSP UK Limited (2019) concluded that the Scheme would not impact defence stability. There is therefore not considered to be any increased risk as a result of the Scheme. The Scheme is outside the reservoir failure flood outlines and so not at risk from this source.	Gardens users, infrastructure and property, surrounding environment.	Casualties, damage to infrastructure and property, disruption to services.	The river wall will be monitored during development works in accordance with the monitoring strategy to ensure no impact is hand on wall stability. A Flood Warning and Evacuation Plan (FWEP) (AtkinsRéalis, 2021) is in place and would be activated if an Environment Agency flood warning is issued, or if the flood defences are impacted or compromised. The FWEP should be subject to annual review and updated as necessary prior to commencing of construction.

6 Air Quality

6.1 Review of Application Changes

- 6.1.1 Chapter 6 has been reviewed following amendments to the design and in light of any baseline and policy changes that have occurred since the ES 2018 and 2019 addendum update.
- 6.1.2 The main changes of relevance are the reduction in baseline concentrations both measured and modelled around the proposed site, the reduction in receptor requirements as per updated guidance, and the changes in air quality neutral guidance, which has altered the benchmark trip rate and the overall traffic used to perform the assessment.
- 6.1.3 These amendments mean that the assessment conclusion is that the proposed site can now be considered air quality neutral. The dust emission risk and magnitude remain the same. Therefore, the information presented in Chapter 6 of the ES (2018 as amended in 2019) has not changed outside of the air quality neutrality.

6.2 Summary

- 6.2.1 The changes to the Scheme have been reviewed and considered together with the changes in legislation and guidance. This results in no change to the overall assessment of the environmental impact associated with air quality as described in Chapter 6 of the ES (2018 as amended in 2019).
- 6.2.2 The mitigation measures and residual impacts detailed in Chapter 6 of the ES (2018 as amended in 2019) remain the same.

6.3 Consideration of Options in Response to the House of Lords Select Committee

- 6.3.1 As explained in Section 1.4, this ES Addendum also considers the potential changes to the scheme that have been proposed in response to the House of Lords Select Committee.
- 6.3.2 With regards to Air Quality, each of the options (Option 1A-1F) has been assessed and it has been determined that none of the proposed options, individually or combined, would alter the conclusions of Chapter 6. Therefore, air quality would remain neutral.

7 Built Heritage, Townscape and Visual Impact Assessment

7.1 Review of Application Changes

- 7.1.1 Chapter 7 has been reviewed following amendments to the design and in light of any baseline and policy changes that have occurred since the ES 2018 and 2019 addendum update. Further details are provided in the updated Volume 3 Built Heritage, Townscape and Visual Impacts Assessment.
- 7.1.2 Since the Inspector's Report on 29 April 2021, the design of the proposed development has undergone revisions to ensure compliance with the latest regulatory requirements. These modifications have been carefully assessed in terms of their impact on heritage assets, townscape character, and visual receptors. These result in no change to the overall assessment of the environmental impact associated with heritage assets, townscape character, and visual receptors as described in Chapter 7 of the ES (2018 as amended

in 2019). Therefore, the proposals are considered to remain compliant with relevant planning policy provisions.

7.2 Summary

- 7.2.1 The changes to the Scheme have been reviewed and considered together with the changes in legislation and guidance. This results in no change to the overall assessment of the environmental impact associated with heritage assets, townscape character, and visual receptors as described in Chapter 7 of the ES (2018 as amended in 2019).
- 7.2.2 The mitigation measures and residual impacts detailed in Chapter 7 of the ES (2018 as amended in 2019) remain the same.

7.3 Consideration of Options in Response to the House of Lords Select Committee

- 7.3.1 As explained in Section 1.4, this ES Addendum also considers the potential changes to the scheme that have been proposed in response to the House of Lords Select Committee.
- 7.3.2 With regards to the Built Heritage, Townscape and Visual Impact Assessment, each of the options (Option 1A-1F), has been assessed and it has been concluded that none of the proposed options, individually or combined, would alter the conclusions of Chapter 7. Further details are provided in Appendix 3: Options Appraisal of the updated Volume 3 Built Heritage, Townscape and Visual Impact Assessment.

8 Archaeology

8.1 Review of Application Changes

- 8.1.1 Chapter 8 has been reviewed following amendments to the design and in light of any baseline and policy changes that have occurred since the ES 2018 and 2019 addendum update. These have not impacted the methodology for assessing the Scheme impacts on heritage assets or potential hitherto unknown archaeological remains.
- 8.1.2 There have been no further designated heritage assets subject to impact by the Scheme identified beyond the scope of those assessed within the initial Desk-based Assessment. Therefore, the information presented in Chapter 6 of the ES (2018 as amended in 2019) has not changed outside of the air quality neutrality.

8.2 Summary

- 8.2.1 The changes to the Scheme have been reviewed and considered alongside the changes to legislation and guidance. These amendments result in no change to the overall assessment of the environmental impact associated with archaeology as described in Chapter 8 of the ES (2018 as amended in 2019).
- 8.2.2 As a result of the above, the mitigation measures included within Chapter 8 of the ES (2018 as amended in 2019) for managing construction works on a site with a high potential for a range of archaeological remains remain appropriate and applicable.

8.3 Consideration of Options in Response to the House of Lords Select Committee

- 8.3.1 As explained in Section 1.4, this ES Addendum also considers the potential changes to the scheme that have been proposed in response to the House of Lords Select Committee.

- 8.3.2 With regards to Archaeology, each of the options (Option 1A-1F) has been assessed and it has been concluded that none of the proposed options, individually or combined, would alter the conclusions of Chapter 8.

9 Population and Human Health

9.1 Review of Application Changes

- 9.1.1 Chapter 9 has been reviewed following amendments to the design and in light of any baseline and policy changes that have occurred since the ES 2018 and 2019 addendum update.
- 9.1.2 The best practice approach to the completion of Human Health assessment in EIA changed in November 2022, following publication by IEMA (now ISEP) of targeted guidance for the scoping and assigning of significance to human health effects within EIA. The new guidance separates population and human health as sub topics, and we have reassessed the Scheme through the introduction of discrete sub-topics in light of this.
- 9.1.3 In separating the assessment into two separate sub-topics, we have considered the more direct impacts of the Scheme on land-use, accessibility and severance within the population sub-topic, with reference to receptor categorisation, sensitivity and impact magnitude as set out in DMRB LA112. The human health sub-topic assessment then identifies the impacts of the Scheme on relevant determinants of human health. With reference to refreshed and updated socio-economic data for the study area, the sensitivities of the wider population and sub-populations within that have been reviewed in the context of the relevant determinants of health that the Scheme may exert impacts on. This has led to some changes in the assigned sensitivities compared to the ES (2018 and 2019). This enables the human health effects of the Scheme to be assessed using a more recent baseline position, and significance identified in each instance.
- 9.1.4 The DMRB LA112 standard and the IEMA November 2022 guidance use different matrices to enable professional judgement to be applied when assessing the significance of effects. However, in order to maintain the consistency of approach from the ES (2018 and 2019), the matrix in Chapter 5 of the ES (2018) has been used to determine the category of effect, with all effects of moderate or major categorisation considered as significant.
- 9.1.5 The revised assessments have also taken account of the recent alterations to the Scheme. Of greatest relevance for this Chapter is the collaborative approach to the design and enhancement of the playground within the Gardens with the input of community members - this was previously reported as an intention, which is understood to have now taken place. This has led to the introduction of additional clauses to the CMP regarding the management of the magnitude of impacts on the playground during the construction phase.

9.2 Residual Effects

Construction

- 9.2.1 The residual effects assessment reflects the anticipated effective implementation of influential mitigation measures during construction.

Construction – Population sub-topic

- 9.2.2 No significant adverse effects are identified for population receptors during construction of the Scheme.

Construction – Human Health sub-topic

- 9.2.3 The Scheme impacts on access to green space and access to recreational and leisure time opportunities as two determinants of human health are assessed as potentially resulting in a moderate adverse (significant)

residual effect on the human health of the wider population and particularly children and low income groups within the wider population. This is reflective of the expectation that the mitigation measures will not be able to eliminate the need to close Horseferry playground in the latter stages of the construction phase, nor avoid a reduction in the useable green space within Victoria Tower Gardens, nor fully avoid interference with established access routes into and through the Gardens. Further, the presence of construction activities will potentially reduce the value and appeal of Victoria Tower Gardens as a green space that can benefit health during the construction phase.

- 9.2.4 It is acknowledged that these human health sub-topic effects are associated with the construction phase only and while they are considered significant, they are temporary and reversible – they will not endure into the operational phase.

Operation

- 9.2.5 Taking account of the design enhancements developed since the previous ES addendum there will be no significant adverse effects for population or human health receptors once the Scheme is operational.

Operation – Population sub-topic

- 9.2.6 Significant beneficial residual effects have been identified through the population sub-topic assessment for users of the community assets within Victoria Tower Gardens; and businesses within and related to Victoria Tower Gardens once the Scheme is operational. This reflects the positive impact of introducing the Holocaust Memorial into the Gardens as a new attraction and focus for employment and learning, coupled with the general environmental enhancements to the Gardens, including improvements to the playground that will be designed within input from the local community.

Operation – Human Health sub-topic

- 9.2.7 Significant beneficial residual effects have been identified through the human health sub-topic assessment for some of the sensitive sub-populations within the wider population, unchanged from the assessment without mitigation.
- 9.2.8 The Holocaust Memorial will create a range of new job opportunities, which are assessed as potentially leading to moderate beneficial (significant) effects for low income groups within the wider population by improving access to work and training.
- 9.2.9 Moderate beneficial effects are also anticipated for all sensitive sub-groups within the wider population due to the positive contribution of the Scheme to promoting improved social cohesion and lifetime neighbourhoods, through the provision of the Memorial and the enhancements to the playground and gardens. The intended role of the Memorial in promoting reflection and remembrance as a means of combatting discrimination and racism has been assessed as having the potential to lead to moderate beneficial (significant) effects for ‘older people’, ‘people who are disabled and/or with other health problems’, and ‘low-income groups’ within the wider population. This could help to reduce health and social inequalities, improve relationships and social networks, have positive effects on tackling behaviours that lead to crime, disorder and violence, and create physical and environmental conditions that could help against discrimination and racism.

9.3 Summary

- 9.3.1 Taking account of the previous mitigation measures and the addition of recommended control measures within the CMP and the design enhancements, the residual effects assessment concludes that the construction impacts on access to green space and recreational and leisure time opportunities continue – i.e. unchanged from the 2018 ES and 2019 ES – to result in a moderate adverse (significant) residual effect on the human health of the wider population and particularly children and low income groups within the wider population. However, significant adverse effects are no longer identified for the population and human health receptors during operation of the Scheme. There will be significant beneficial effects once the scheme is operational.

9.4 Consideration of Options in Response to the House of Lords Select Committee

- 9.4.1 As explained in Section 1.4, this ES Addendum also considers the potential changes to the scheme that have been proposed in response to the House of Lords Select Committee.
- 9.4.2 With regards to Population and Human Health, each of the options (Option 1A-1F) has been assessed and it has been concluded that none of the proposed options, individually or combined, would alter the conclusions of Chapter 9.

10 Soils, Geology and Hydrogeology

10.1 Review of Application Changes

- 10.1.1 Chapter 10 has been reviewed following amendments to the design and in light of any baseline and policy changes that have occurred since the ES 2018 and 2019 addendum update.
- 10.1.2 A factual ground investigation completed in 2019, following the submission of the planning application and ES Addendum, confirmed geological and hydrogeological conditions, identified generally low contamination levels with limited asbestos presence, and found no UXO.
- 10.1.3 Legislative updates include the introduction of Land Contamination Risk Management (LCRM) guidance (2020, updated through 2025), which aligns with the original assessment methodology.

10.2 Summary

- 10.2.1 It has been determined that following consideration of the ground investigation completed in 2019 and the changes in legislation as well design amendments, these changes do not materially affect the conclusions of the ES; mitigation measures and residual effects remain as previously assessed, supported by improved confidence in ground conditions and risk management.

10.3 Consideration of Options in Response to the House of Lords Select Committee

- 10.3.1 As explained in Section 1.4, this ES Addendum also considers the potential changes to the scheme that have been proposed in response to the House of Lords Select Committee.
- 10.3.2 With regards to Soils, Geology and Hydrogeology, each of the options (Option 1A-1F) has been assessed and it has been concluded that none of the proposed options, individually or combined, would alter the conclusions of Chapter 10.

11 Biodiversity

11.1 Review of Application Changes

- 11.1.1 Chapter 11 has been reviewed following amendments to the design and in light of any baseline and policy changes that have occurred since the ES 2018 and 2019 addendum update.
- 11.1.2 Since 2019, key policy updates have strengthened biodiversity considerations at national and local levels. The National Planning Policy Framework (NPPF) was revised in 2024, reinforcing requirements for measurable biodiversity net gain, protection of irreplaceable habitats, and strategic planning for ecological networks. Locally, Westminster's City Plan continues to prioritise biodiversity and green infrastructure,

requiring avoidance, mitigation, or compensation for ecological impacts, while the Westminster Biodiversity Action Plan remains a guiding document for species and habitat conservation.

- 11.1.3 Since 2019, key guidance updates include the publication of new guidance documents for bats and birds. For bats, Natural England released updated planning advice (2022), and new best practice guidelines were introduced: Bat Mitigation Guidelines (Reason & Wray, 2023) and Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th Edition (BCT, 2023). For birds, guidance for planning decisions was updated in 2022.
- 11.1.4 The ecological assessment has been updated to incorporate data from the August 2025 desk study and extended Phase 1 habitat survey, replacing previous updates from October 2018. Key revisions include updated records from GiGL and MAGIC, confirmation of habitat conditions within the site and surrounding area, and refined evaluation of ecological features such as commuting and foraging bats, nesting birds, and notable invertebrates. The construction timeline has been amended from 2020 to 2027, with duration reduced from 48 to 36 months. Designated sites, priority habitats, and species records have been revised to reflect current data, and mitigation measures have been expanded to include updated lighting strategies and biodiversity enhancements.

11.2 Summary

- 11.2.1 Chapter 11 has been reviewed in light of policy changes and Scheme design changes that have occurred since the date of the planning application in 2018.
- 11.2.2 No changes have been made to the previous plans, and no significant impacts are anticipated on biodiversity.
- 11.2.3 The mitigation measures and residual impacts detailed in Chapter 12 of the ES (2018 as amended in 2019) remain the same, except for updated specifications for luminaires.

11.3 Consideration of Options in Response to the House of Lords Select Committee

- 11.3.1 As explained in Section 1.4, this ES Addendum also considers the potential changes to the scheme that have been proposed in response to the House of Lords Select Committee.
- 11.3.2 With regards to Biodiversity, each of the options (Option 1A-1F) has been assessed and it has been concluded that none of the proposed options, individually or combined, would alter the conclusions of Chapter 11.

12 Water Quality and Flood Risk

12.1 Review of Application Changes

- 12.1.1 Chapter 12 has been reviewed following amendments to the design and in light of any baseline and policy changes that have occurred since the ES 2018 and 2019 addendum update.
- 12.1.2 Since 2019, the assessment of water quality and flood risk for the Scheme has been updated primarily to reflect minor design changes, updated policy guidance, and revised receptor classifications.
- 12.1.3 Design amendments include a slight reduction in the learning centre footprint (213 m²), minor repositioning of paths, and internal layout changes, with no alterations to drainage arrangements or works to the river wall. These changes were deemed immaterial to water quality and flood risk impacts, which remain focused on construction-phase risks only.
- 12.1.4 Policy updates include the Environment Agency's 2022 climate change guidance and the introduction of the London Surface Water Strategy (2025), requiring stricter SuDS standards.

- 12.1.5 The FRA was updated in 2025 confirming continued compliance with TE2100 requirements and the 16 m setback from flood defences. Baseline water quality data for the River Thames remain largely unchanged, though receptor sensitivity has been reclassified from Medium to Very High under updated DMRB guidance, with pre-mitigation impacts still negligible to minor.

12.2 Summary

- 12.2.1 Chapter 12 has been reviewed in light of policy changes and design amendments that have occurred since the date of the planning application in 2018.
- 12.2.2 Overall, mitigation measures and residual effects remain consistent with the ES (2018 as amended in 2019), with no significant changes to conclusions on water quality or flood risk.

12.3 Consideration of Options in Response to the House of Lords Select Committee

- 12.3.1 As explained in Section 1.4, this ES Addendum also considers the potential changes to the scheme that have been proposed in response to the House of Lords Select Committee.
- 12.3.2 With regards to Water Quality and Flood Risk, each of the options (Option 1A-1F), has been assessed and it has been concluded that none of the proposed options, individually or combined, would alter the conclusions of Chapter 12.

Traffic and Transport

13.1 Review of Application Changes

- 13.1.1 An updated Transport Assessment (TA) has been prepared by WSP which has been used to inform the ES Chapter. The analysis undertaken in the TA has highlighted that any changes to the ES effects are negligible. Due to the current scheme design proposing no change with regard to transport infrastructure as originally assessed in the 2018 ES and 2019 ES. This ES has taken into account changes in the surrounding transport network and baseline conditions, which will affect the degree to which the site impacts the transport network. A review of Committed Developments has also been undertaken.
- 13.1.2 The updated analysis demonstrated very little change in traffic movements between 2017 and 2024. There has been a large increase in cycle movements on Millbank due to increased cycling in central London.
- 13.1.3 The updated Atkins survey undertaken in 2025 illustrates a large reduction in pedestrian movements since the 2017 survey. This is the primary change in background conditions since the 2018 ES and 2019 ES.
- 13.1.4 The UKHMLC visitor numbers and visitor strategy has not been changed since the 2018 ES.
- 13.1.5 Due to the reduction in pedestrian movements in the AtkinsRéalis 2025 survey, it is concluded that the worst case assessment as previously submitted has not changed, and the impacts on pedestrian movements in the area are considered negligible.
- 13.1.6 There have been little or no change to the surrounding network with the exception of the TfL Lambeth Bridge scheme which is now being implemented. This will provide improved crossing facilities and safer facilities for cyclists using the proposed development.
- 13.1.7 A Coach Park Strategy, Travel Plan and DSP will be provided and secured by condition and will detail the on site management aspects prior to operation. The visitor cycle parking proposed on Millbank will also be secured by a planning condition.
- 13.1.8 A comprehensive transport assessment of the development proposals has been undertaken in order to determine the anticipated transport impacts of the UKHMLC's operation and setting out the measures to mitigate these impacts where appropriate.

13.2 Summary

- 13.2.1 In conclusion, the impacts and effects of the proposed development are consistent with those reported in the 2018 ES and 2019 ES.

13.1 Consideration of Options in Response to the House of Lords Select Committee

- 13.1.1 As explained in Section 1.4, this ES Addendum also considers the potential changes to the scheme that have been proposed in response to the House of Lords Select Committee.
- 13.1.2 The transport analysis has been reviewed and updated to assess each of the options (Options 1A-1F), and concludes that none of the Options, individually or combined, have any direct impact on the transport assessment and supporting transport evidence in the updated Transport Assessment report or the conclusions of Chapter 13.

Material Assets and Climate Change

14.1 Review of Application Changes

- 14.1.1 Chapter 11 has been reviewed following amendments to the design and in light of any baseline and policy changes that have occurred since the ES 2018 and 2019 addendum update, incorporating the London Plan (2021), Westminster City Plan (2021), City of Westminster Climate Action Plan (2021), and Thames Estuary 2100 Plan.
- 14.1.2 A review of UKCP18 projections concluded that updating from UKCP09 would not alter assessment outcomes, though future heavy summer rainfall events may increase.
- 14.1.3 Background emissions data has been revised. UK emissions decreased from 467.9 MtCO₂e (2016) to 371 MtCO₂e (2024), London's share rose slightly to 9%, and Westminster's emissions fell from 2,199 ktCO₂e (2015) to 1,661 ktCO₂e (2022). The scheme's annual emissions remain negligible at 1,895 tCO₂e, representing 0.01% of Westminster's emissions and 0.007% of London's.

14.2 Summary

- 14.2.1 The changes to the Scheme have been reviewed and considered together with the changes in legislation and guidance. Overall, these changes do not affect the original assessment or mitigation measures, and the development continues to have a negligible, non-significant climate impact.

14.3 Consideration of Options in Response to the House of Lords Select Committee

- 14.3.1 As explained in Section 1.4, this ES Addendum also considers the potential changes to the scheme that have been proposed in response to the House of Lords Select Committee.
- 14.3.2 With regards to Material Assets and Climate Change, each of the options (Option 1A-1F) has been assessed and it has been concluded that none of the proposed options, individually or combined, would alter the conclusions of Chapter 14.

15 Cumulative Effects

15.1 Review of Application Changes

- 15.1.1 Chapter 15 has been reviewed following amendments to the design and in light of any baseline and policy changes that have occurred since the ES 2018 and 2019 addendum update.
- 15.1.2 The main changes of relevance are the incorporation of updated Planning Inspectorate guidance (March 2025) and the revision of the shortlist of other developments considered for cumulative effects, referenced in Table 15-1. Most developments identified in 2019 have either been completed or their consents have expired, and a new shortlist of major schemes within 1.5 km has been compiled, including Westminster House, Millbank Tower, and Royal Street redevelopment.
- 15.1.3 These amendments do not materially alter the conclusions of the cumulative effects assessment. Intra-Scheme effects during construction remain slight adverse and not significant, while operational effects continue to deliver moderate beneficial effects for human receptors. Inter-project cumulative effects during operation are assessed as slight beneficial overall, with minor adverse effects linked to climate vulnerability, but these are not significant.

15.2 Summary

- 15.2.1 The changes to the Scheme and updated guidance have been reviewed and considered together. This results in no change to the overall assessment of cumulative effects as described in Chapter 15 of the ES (2019).
- 15.2.2 The mitigation measures and residual impacts detailed in Chapter 15 of the ES (2018 as amended in 2019) remain the same.

15.3 Consideration of Options in Response to the House of Lords Select Committee

- 15.3.1 As explained in Section 1.4, this ES Addendum also considers the potential changes to the scheme that have been proposed in response to the House of Lords Select Committee.
- 15.3.2 With regards to Cumulative Effects, each of the options (Option 1A-1F) has been assessed and it has been concluded that none of the proposed options, individually or combined, would alter the conclusions of Chapter 15.

Table 15-1 – Short List of ‘Other Development’

Development	App. No.	Status	Distance from site (km)	Description	Construction Status
Westminster House, 7 Millbank	21/01508/ FULL	Approved 08 Feb 2022 Latest pre-commencement construction condition approved May 2025	0.29	Demolition of the existing office building, including dismantling and retention of façades to Millbank, Dean Stanley Street, and Smith Square. Redevelopment of the site to provide a building comprising a double basement, ground, and nine upper floors for commercial business and service use (Class E), incorporating new and reclaimed materials. The development includes an extension to Smith Square, formation of external	Likely to be constructed in the same timeframe as the Scheme

Development	App. No.	Status	Distance from site (km)	Description	Construction Status
				terraces at sixth, seventh, and eighth floor levels, and a new principal entrance on Dean Stanley Street with secondary and servicing entrances on Smith Square. The scheme also includes the installation of plant and associated works. Namely, to allow amendments to the internal layout, to the facade, to the terrace and amendments at roof level.	
Millbank Tower, 21-30 Millbank	18/09095/ FULL 24/03724/ NMA	Approved 14 April 2022	0.02	Variation of Condition 1 and 43 of planning permission dated 28th June 2016 (15/07756/FULL) for 'Refurbishment and replacement of facades and erection of 2 additional floors and plant enclosure to both Millbank Tower and 1 additional floor to the Y buildings; excavation of basement levels; demolition of rear car park in association with re-landscaping and reconfiguration of wider site; all in association with the use of the Tower as 207 private residential flats (Class C3) and Skybar (ancillary to adjacent Class C1), the south podium and part of tower as an arts / cultural facility (Class D1) and the north podium and Y buildings as a hotel (Class C1) with restaurant, bar and café at ground floor level. Use of roof of podium building as a terrace with associated alterations.' NAMELY, to allow changes to list of approved plans to allow an increase in number of hotel bedrooms from 150 to 232, complete demolition and rebuilding of the prow to allow for reconfiguration of arts/cultural facility, amendments to the residential mix/layouts in the Tower, re-configuration of basement car parking and servicing area, adjustments to landscaping and associated amendments.	Likely to be constructed in the same timeframe as the Scheme
Jonathan Street and Orsett Street (South Bank)	20/04393/ RG3	Approved 15 November 2021	0.65	Redevelopment of the site comprising demolition of all existing buildings and structures and provision of residential dwellings (Class C3) in five buildings ranging between 4 and 11 storeys (plus plant on roof) together with	Construction has not begun. Likely to be constructed in the same

Development	App. No.	Status	Distance from site (km)	Description	Construction Status
				associated landscaping and infrastructure works.	timeframe as the Scheme
Graphite Square, Vauxhall Walk, Tamworth Street	17/02936/FUL	Refused, March 2018. Appeal allowed	0.66	Demolition of existing office, warehouse and church buildings (use classes B1, B8, and D1), and redevelopment of the site to provide a residential led mixed-use development with a podium building of ground plus 3 storeys (fronting onto Worgan Street) connecting a ground plus 9 storey building (fronting onto Worgan Street), a ground plus 13 storey building (fronting onto Worgan Street), and ground plus 13 storey building (at the junction of Worgan Street and Jonathan Street) to provide 160 residential units, offices (use class B1), a ground-floor flexible retail/café/office (flexible use class A1/A3/B1), a replacement Methodist church (use class D1), and provision of a single level basement, together with servicing, car and cycle parking, and provision of new public realm and associated works.	Under construction Expected completion date end of 2025
Westminster Tower, 3 Albert Embankment	15/03470/VOC	22 April 2016	0.26	Refurbishment and conversion of existing building to provide office (B1 Use) accommodation at lower levels; 34 residential units on upper levels; together with ancillary residential accommodation, car and cycle parking and refuse storage., amendment in April 2016 to remove 11 shared ownership units and 742sqm of office space.	Under construction with fit out expected to be completed April 2027
Denby Court, 99 + 109 Lambeth Walk	20/04425/RG3	27 November 2024	0.67	Redevelopment of the site comprising demolition of all existing buildings and structures and provision of residential dwellings (Class C3) in five buildings ranging between 4 and 11 storeys (plus plant on roof) together with associated landscaping and infrastructure works (information for the purpose of consultation: the proposed development provides 141 residential units (50% affordable), which comprise 45x 1-bed, 84x 2-bed, 7x 3-bed and 5x 4-bed).	Construction has not begun. Likely to be constructed in the same timeframe as the Scheme

Development	App. No.	Status	Distance from site (km)	Description	Construction Status
Land North And South Of Royal Street	22/01206/EIAFUL	03 July 2023	0.55	Demolition of the majority of existing buildings on Plots A, B, C & D including Canterbury House, Stangate House, 10 Royal Street and 20 Carlisle Lane; part retention of existing buildings on Plots E and conversion of the railway arches (Plot F); comprehensive phased redevelopment of the site to provide a mixed use development of buildings 12-16 storeys in height containing commercial floorspace (including lab enabled floorspace), residential, retail and community floorspace; enhanced public realm and pedestrian routes; re-location of listed sculpture; servicing, ancillary plant and storage, cycle parking and other associated and ancillary works. The proposed development provides: 133 residential units, 158,858 sqm GIA commercial space (including office and lab enabled space) . 4,792 sqm GIA retail, food & beverage, gym, community and cultural uses . 372 sqm GIA meeting space for office and community use.	Construction has not begun. Likely to be constructed in the same timeframe as the Scheme Completion date 2030.

16 Conclusions

16.1 Overview

- 16.1.1 The primary purpose of an ES is to gather, assess in a systematic manner and collate information on the anticipated significant effects of a development on the environment in the form of an Environmental Impact Assessment, in order that this information can be properly considered by the decision maker before a decision is made on whether to grant planning permission for a development.
- 16.1.2 The assessment of significant effects has been undertaken in the previous chapters of the ES, and in this chapter the information has been summarised to reflect the overall conclusions of the assessment.
- 16.1.3 This document presents the ES which has been prepared within the EIA procedure to accompany the planning application. It outlines the Scheme, the likely significant environmental effects and any mitigation proposals necessary to reduce adverse effects.

16.2 Summary of significant effects

- 16.2.1 With the implementation of mitigation measures that are outlined within the topic chapters above the majority of effects on the environment from the construction and operation of the Holocaust Memorial and Learning Centre are not significant.

Beneficial Effects

- 16.2.2 The UK Holocaust Memorial and Learning Centre will result in beneficial effects on heritage assets within and surrounding the gardens once completed as it will attract new visitors and create new views and visual character within and surrounding the gardens towards Westminster. The Scheme may also provide beneficial effects to the visiting and local population as well as providing business and employment opportunities.
- 16.2.3 Moderate beneficial effects are also anticipated for the wider population due to the positive contribution of the Scheme to promoting improved social cohesion and lifetime neighbourhoods, through the provision of the Memorial and the enhancements to the playground and gardens and the role of the Memorial in promoting reflection and remembrance as a means of combatting discrimination and racism. This could help to reduce health and social inequalities, improve relationships and social networks, have positive effects on tackling behaviours that lead to crime, disorder and violence, and create physical and environmental conditions that could help against discrimination and racism.

Adverse Effects

- 16.2.4 Although the design of the Holocaust Memorial and Learning Centre has been carefully considered to ensure there are minimal impacts on the gardens, users of the gardens and the local area, some significant effects will remain during the construction and operation of the Scheme which are outlined in Table 16-1 and Table 16-2 below. All construction effects will be temporary. During operation, two moderate adverse effects remain. Regular visitors to the gardens will experience an increased number of people using the gardens and pedestrians and road users will experience a restricted view of the River Thames and gardens from Dean Stanley Street.
- 16.2.5 Changes to policy and guidance have been reviewed and it is concluded that there is one change to the overall assessment of the significant effects as described in the ES (2018 as amended in 2019). It was previously concluded that there would be a permanent significant adverse effect on health and wellbeing experienced by existing park users because of the projected increase in footfall, as a result of the new assessment guidance and taking account of design enhancements this is no longer considered to be significant. However, the Traffic and Transport Assessment is still identifying a permanent significant impact on pedestrian amenity.

Table 16-1 - Summary of Significant Temporary Construction Effects

Topic	Impact	Receptor	Residual Effects	Details
Traffic and Transport	Pedestrian amenity	Existing visitors to Victoria Tower Gardens	Moderate (Significant)	During the construction phase, there remains a moderate effect on pedestrian amenity and access to green space and recreational and leisure time opportunities to existing users of Victoria Tower Gardens due to a reduction in the useable area of the park. Two of the five accesses will be closed to pedestrians, and there is no connectivity between the two open sections of the park. This effect is temporary (only lasting for a portion of the construction works) and reversible: once construction is complete, all gates of the gardens will return to public use.
Population and Human Health	Access to Green space and land blight	- Wider Groups - Children and adolescents	Moderate (Significant)	The Scheme's effects on access to green space and recreational opportunities are assessed as a moderate adverse on the human health of the wider population, particularly children and low-income groups. This reflects the likelihood that mitigation cannot prevent the temporary closure of Horseferry playground, reductions in usable green space in Victoria Tower Gardens, or disruptions to established access routes. Construction activity may also reduce the Gardens' overall quality and appeal as a health-supporting green space. These impacts are limited to the construction phase and are temporary and reversible.
	Access to open space, recreational and leisure-time activities	- Children and adolescents - Low income groups	Moderate (Significant)	
Traffic and Transport	Traffic delay	Existing users of the surrounding transport network	Moderate (Significant)	During construction there remains a moderate adverse impact on traffic delay arising from construction vehicles manoeuvring in and out of the construction site access. These will be very short in duration and temporary in nature.
Heritage	Increased noise, vibration, dust and traffic	Victoria Tower Gardens and around the Buxton Memorial	Moderate (Significant)	During the construction phase, a moderate adverse effect on the Victoria Tower Gardens Registered Park (Grade II) and Buxton Memorial Fountain (Grade II*) will remain due to increased noise and areas of the park being enclosed by hoardings reducing available space. This effect will be temporary as once construction is complete the noise from construction will reduce and the gardens will return to public use.
Townscape	Construction activities	Character Area 1 – Victoria Tower Gardens	Moderate (Significant)	During construction, a moderate adverse effect on the townscape of the gardens will remain due to activities within and around the site. This effect will be temporary as once construction is complete all activities will be finished, and the gardens will return to public use.

Table 16-2 - Summary of Significant Operational Effects

Topic	Impact	Receptor	Residual Effects	Details
Traffic and Transport	Pedestrian amenity	Existing visitors to Victoria Tower Gardens	Moderate (Significant)	During operation there will be a moderate effect on pedestrian amenity experienced by existing park users, as a result of the projected increase in footfall. Whilst the vast majority of the gardens will remain freely accessible to the public, the open space will accommodate a much higher number of visitors than at present.
Visual	Reduced view the River Thames and change of view from Dean Stanley Street	Pedestrians and road users	Moderate (Significant)	A moderate effect on View 13 from Dean Stanley Street towards the gardens is anticipated to remain as the bronze fins from the Memorial will block the view to the River Thames and the character of the view will change from open parkland to one focussed on the built form of the memorial. This is one of 22 views assessed, the range of visual effects on relevant views span the category of moderate adverse (View no. 13) to moderate beneficial (View Nos. 14, 16, 17, 18, 20, 21 and 22).

16.3 Consideration of Options in Response to the House of Lords Select Committee

- 16.3.1 Each of the six potential options proposed in response to the House of Lords Select Committee, detailed in Section 1.4, have been assessed individually and cumulatively for each chapter and topic respectively. These options propose alterations to the playground arrangements, visitor access to Buxton Memorial and the design and location of the refreshment kiosk.
- 16.3.2 Following this assessment, it has been determined that none of the proposed options, individually or combined, would alter the conclusions of the assessments and therefore findings of the ES.

Glossary of terms

CMP: Construction Management Plan, this document outlines the measures required for environmental management at the construction stage.

DMRB: Design Manual for Roads and Bridges

DSP: Delivery and Servicing Plan

EIA: Environmental Impact Assessment as defined by the Town and Country Planning (Environmental Impact Assessment) Regulations 2011.

ES: Environmental Statement which reports on the findings of the EIA

FRA: Flood Risk Assessment

FWEP: Flood Warning and Evacuation Plan

GiGL: Greenspace Information for Greater London

HTVIA: Built Heritage, Townscape and Visual Impact Assessment

IEMA: Institute for Environmental Management and Assessment

ISEP: Institute of Sustainability and Environmental Professionals

LAEI: London Atmospheric Emissions Inventory

MAGIC: Multi-Agency Geographic Information for the Countryside

NAFRA2: National Flood Risk Assessment

NPPF: National Planning Policy Framework

PTAL: Public Transport Accessibility Level

Scheme: Scheme that would be the subject of the planning application

Site: Area that would be the subject of the planning application.

SuDs: Sustainable Drainage Systems

TA: Transport Assessment

TE2100: Thames Estuary 2100 plan

TfL: Transport for London

UKCP09: United Kingdom Climate Projections 2009

UKCP18: United Kingdom Climate Projections 2018

UKHMLC: United Kingdom Holocaust Memorial and Learning Centre

UXO: Unexploded ordnance

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