ENVIRONMENTAL STATEMENT VOLUME 3 - BUILT HERITAGE, TOWNSCAPE AND VISUAL IMPACTS ASSESSMENT UPDATE

UNITED KINGDOM HOLOCAUST MEMORIAL AND LEARNING CENTRE

MAY 2026

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1.0
INTRODUCTION
UNITED KINGDOM HOLOCAUST MEMORIAL AND LEARNING CENTRE

INTRODUCTION

1.1 Montagu Evans LLP has been instructed by the Ministry for Housing, Communities and Local Government to prepare this Addendum to the (Built) Heritage, Townscape and Visual Impact Assessment (the '2026 Addendum') for proposals to develop the United Kingdom Holocaust Memorial and Learning Centre (the 'Proposed Development'). The HTVIA comprised Volume 3 of the Environmental Statement (ES) submitted for the application in 2018.

1.2 An application for planning permission (PP-00114/FULL) was submitted to Westminster City Council ('the Council') in December 2018 for:

Installation of the United Kingdom Holocaust Memorial and Learning Centre including excavation to provide a basement and basement mezzanine for the learning centre (Class D1); erection of a single storey entrance pavilion; re-provision of the Horseferry Playground and refreshments kiosk (Class A1); repositioning of the Spicer Memorial; new hard and soft landscaping and lighting around the site; and all ancillary and associated works.

1.3 During the consultation process for the ES (2018), the scheme evolved further in response to consultee comments. In broad terms, the parameters of the Scheme remained the same, however the following revisions were made:

1.3.1 A revised design for the entrance pavilion; and

1.3.2 Adjustments to the design of the Memorial courtyard.

1.4 These amendments gave rise to the need to re-assess the heritage, townscape and visual effects of the Scheme and update the ES, which was undertaken in April 2019 in the form of the first HTVIA addendum, herein referred to as the 'Addendum (2019)'.

THE PROPOSED DEVELOPMENT ('2026 SCHEME')

1.5 The design modifications have been made to ensure full compliance with the latest building regulations and good practice guidelines. They include:

1.5.1 Amendments to the skylight;

1.5.2 The VTG path has been repositioned;

1.5.3 The memorial courtyard levels/landing area amended;

1.5.4 The removal of one step from each flight – 12 steps per flight instead of 13;

1.5.5 Internal amendments to planform to achieve compliance with 2025 Regulations;

1.5.6 A helical staircase with skylight (instead of square staircase); and

1.5.7 The exit route gradient has changed and the door has been removed.

1.6 The above amendments are accounted for in an updated description of the development (Chapter 3 of this Addendum).

1.7 The description of development (the 'Proposed Development' , 'Proposed Action', or '2026 Scheme') has been revised as follows:

Installation of the United Kingdom Holocaust Memorial and Learning Centre including excavation to provide a basement and basement mezzanine for the learning centre (Class F1); erection of a single storey entrance pavilion; re-provision of the Horseferry Playground and refreshments kiosk (Class E(a)); repositioning of the Spicer Memorial; new hard and soft landscaping and lighting around the site; and all ancillary and associated works.

SCOPE AND PURPOSE OF THE REPORT

1.8 In light of recent modifications to the scheme and changes to baseline conditions, the 2026 Addendum considers whether the changes would materially alter the assessments of impact described at Volume 3 of the ES (2018) and the earlier Addendum (2019), both prepared by Montagu Evans.

1.9 Due to the minor scale and scope of the modifications, the experience of those elements of the proposals which are the subject of this addendum would be limited. Therefore, professional judgment has been used to select those built heritage, townscape and visual receptors which may experience a different effect from that identified in the HTVIA as a result of the change to the proposals.

1.10 The methodology for the assessment of effects on heritage, townscape and visual receptors remains the same as that described at **Section 2.0** in Volume 3 of the ES (2018). For ease of reference, the methodology is reproduced at **Appendix 1.0**.

2.0
LEGISLATION AND POLICY REVIEW
UNITED KINGDOM HOLOCAUST MEMORIAL AND LEARNING CENTRE

LEGISLATION AND POLICY REVIEW

2.1 In writing this addendum, we have carried out a review of the relevant policy provisions and best practice guidance outlined in **Section 3.0** of Volume 3 in the ES, to identify any which may have changed since the submission of the ES in December 2018.

2.2 For the avoidance of doubt, we confirm here that the statutory context remains unchanged from 2018.

DEVELOPMENT PLAN

2.3 Since the application was first submitted in 2018, the development plan context has changed with the adoption of the London Plan (2021) and Westminster City Plan (2021). The relevant emerging policies were considered in the HTVIA (2018) and Addendum (2019). It is acknowledged that these policies now hold more weight as they are adopted.

HERITAGE AND DESIGN

2.4 The proposals have the potential to impact designated heritage assets, including a World Heritage Site, listed buildings and a conservation area.

2.5 Policy HC1 (Heritage Conservation and Growth) of the London Plan accords with the principles of the NPPF, which seeks to avoid harm and identify enhancement opportunities. It stipulates that:

2.6 '(C) Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.... Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.'

2.7 Policy 38 (Design Principles), 39 (Westminster's Heritage), and Policy 40 (Townscape and architecture) would be engaged by the Proposed Development.

2.8 Policy 38 relates to Design and states in Part B that all development will positively contribute to Westminster's townscape and streetscape by having regard to, among other things, the character and appearance of the existing area, adjacent buildings and heritage assets.

2.9 Policy 39 deals with Heritage and states that development must optimise the positive role of the historic environment in Westminster's townscape, economy and sustainability. In particular, Part B(2) of Policy 39 states that development should secure the conservation and continued beneficial use of heritage assets through their retention and sensitive adaption which avoids harm to their significance, while allowing them to meet changing needs.

2.10 Policy 40 relates to Townscape and Architecture. Part A states development will be sensitively designed, having regard to the prevailing scale, heights, character, building lines and plot widths, materials, architectural quality and degree of uniformity in the surrounding townscape.

2.11 Part D states that alterations and extensions will respect the character of the existing and adjoining buildings, avoid adverse visual and amenity impacts and will not obscure important architectural features or disrupt any uniformity, patterns, rhythms or groupings of buildings and spaces that contribute positively to Westminster's distinctive townscape.

WORLD HERITAGE SITE

2.12 The Site falls within the setting of The Palace of Westminster and Westminster Abbey including St. Margaret's Church WHS. WHS are internationally significant heritage designations which are recognised to have OUV (see NPPF paragraph 202).

2.13 Policy HC2 (World Heritage Sites) of the London Plan includes limbs relating to development proposals affecting World Heritage Sites. It stipulates that:

2.14 (B) Development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their Outstanding Universal Value, or the authenticity and integrity of their attributes.

2.15 (C) Development proposals with the potential to affect World Heritage Sites or their settings should be supported by Heritage Impact Assessments. Where development proposals may contribute to a cumulative impact on a World Heritage Site or its setting, this should be clearly illustrated and assessed in the Heritage Impact Assessment.

2.16 Part C of Policy 39 states that the Outstanding Universal Value (OUV), authenticity and integrity of the Westminster World Heritage Site will be conserved and enhanced. To assist in this, Part F requires applicants to demonstrate that any impacts of their proposals on the World Heritage Site or its setting have been fully assessed, informed by Heritage Impact Assessment methodology and that any harm, including cumulative harm, has been avoided or justified.

LISTED BUILDINGS

2.17 Part G relates to works to listed buildings, and exceeds the requirements of the NPPF and statute, stating that works to listed buildings will preserve their special interest, relating sensitively to the period and architectural detail of the building and protecting or, where appropriate, restoring original or significant detail and historic fabric. This does not allow for harmful works where they secure the long-term use of the building or are outweighed by the public benefits, as per paragraph 215 in the 2024 NPPF.

CONSERVATION AREAS

2.18 Part K relates to conservation areas and states that development will preserve or enhance the character and appearance of Westminster's conservation areas, which is in line with the NPPF.

NATIONAL PLANNING POLICY FRAMEWORK

2.19 The National Planning Policy Framework (NPPF) was last updated in December 2024. Apart from the paragraph numbering, the heritage policies in Chapter 16 remain unchanged in the current adopted NPPF.

DRAFT NATIONAL PLANNING POLICY FRAMEWORK (2025)

2.20 The draft revised NPPF, published for consultation on 16 December 2025, seeks to support the delivery of sustainable economic growth and increased housing supply while maintaining appropriate environmental protections.

2.21 The draft NPPF introduces a clearer approach to assessing heritage impacts, explicitly recognising that effects may be positive, neutral or harmful, and reinforcing that proposals delivering positive heritage outcomes should be supported.

2.22 It places new emphasis on clearly articulating the degree of harm and clarifies that the scale of development is irrelevant, what matters is its effect on heritage significance. Importantly, the draft redefines 'substantial harm' so that it no longer equates to total loss of significance, reflecting the 2022 Holocaust Memorial judgement and moving permanently away from the earlier Bedford interpretation.

2.23 While the term 'less than substantial harm' is removed, a lower tier of non-substantial harm remains, though ambiguity persists around the treatment of neutral effects.

2.24 The changes reflect a more detailed approach to decision making in sensitive historic contexts.

2.25 The consultation on the draft NPPF runs into early 2026, following which the Government will consider representations and may introduce further amendments prior to final publication. Once adopted, the revised NPPF will carry full material weight and will guide the preparation of new-style local plans and the determination of planning applications, superseding previous versions of national planning policy.

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3.0
HERITAGE ADDENDUM
UNITED KINGDOM HOLOCAUST MEMORIAL AND LEARNING CENTRE

HERITAGE ADDENDUM

CHANGES TO THE BASELINE

HERITAGE

3.1 The built (above ground) heritage assessment has considered the significance of heritage assets and the impact of the Proposed Development upon that significance. Assessment of the likely significant effects of the Proposed Development on archaeological deposits is beyond the scope of this section (see relevant chapter of the ES for archaeological assessment).

3.2 The effects on the above heritage assets were carefully considered as part of the ES (2018) and re-considered in the Addendum (2019).

3.3 For the avoidance of doubt, unless otherwise stated here, the effects remain the same as identified in the ES (2018) and Addendum (2019).

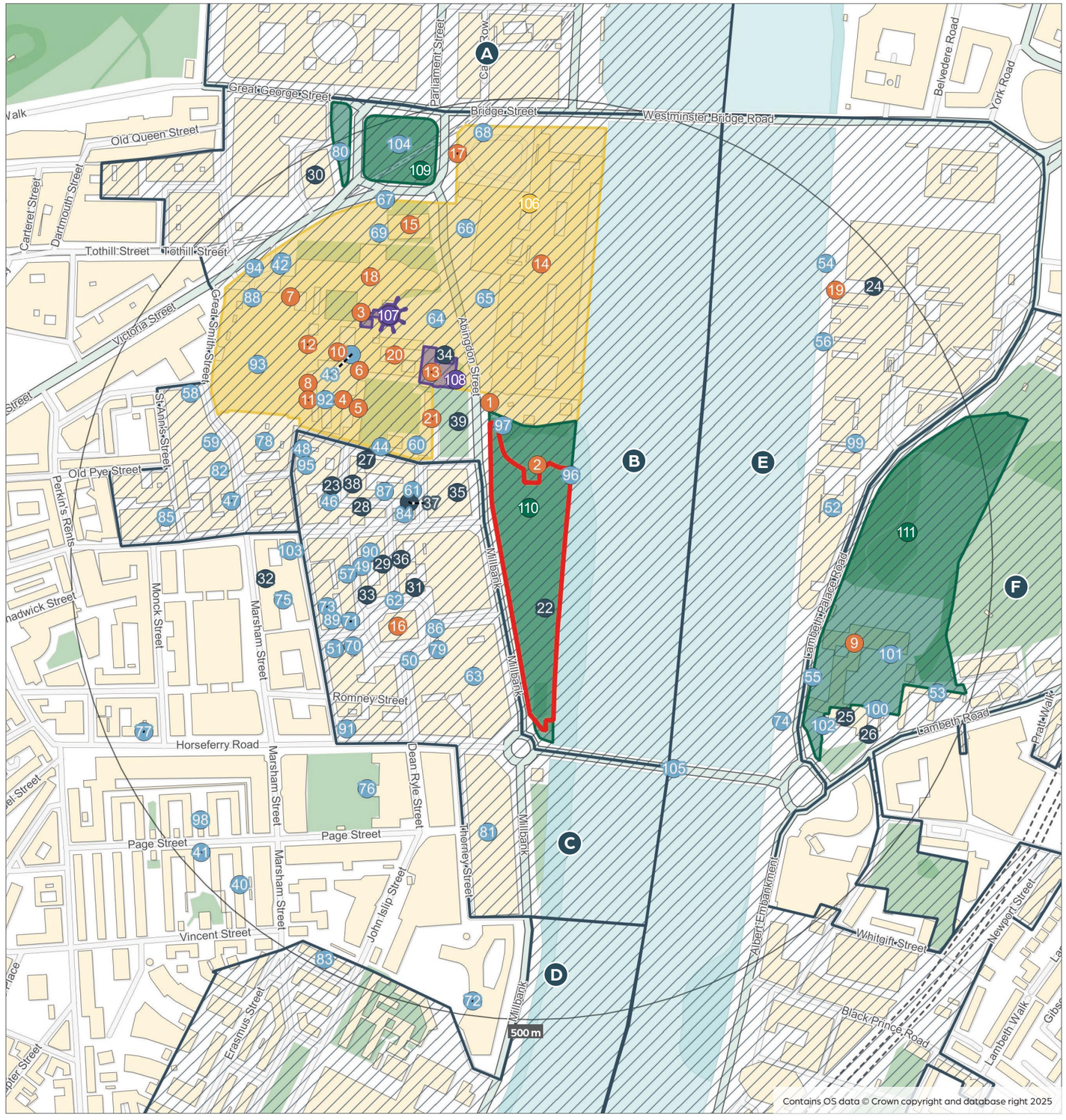
3.4 Since 2019, the heritage baseline context has changed in the following ways:

3.4.1 The Memorial to Emmeline and Christabel Pankhurst (formerly the Statue of Mrs Emmeline Pankhurst) was amended and upgraded to Grade II* status (formerly Grade II).

3.4.2 The following assets have been added to the statutory list:

- Lamp post outside 3 Barton Street (Map ref. 112)
- Lamp post outside 12 Cowley Street (Map ref. 113)
- Lamp post opposite 7 Cowley Street (Map ref. 114)
- Lamp post outside 8 Barton Street (Map ref. 115)
- Lamp post outside 1 Cowley Street (Map ref. 116)
- Lamp post outside 7–9 Dean Bradley Street (Map ref. 117)
- Lamp post outside 2 Dean Stanley Street (Map ref. 118)
- Lamp post outside 1 Dean Trench Street (Map ref. 119)
- Lamp post next to 3 Dean Trench Street and outside 36 Smith Square (Map ref. 120)
- Lamp post on corner of 13 Gayfere Street and 1 Smith Square (Map ref. 121)
- Lamp post outside 11 Gayfere Street (Map ref. 122)
- Lamp post outside 22 Gayfere Street (Map ref. 123)
- Lamp post outside 4 Tufton Street (Map ref. 124)
- Lamp post outside 22 Great College Street (Map ref. 125)
- Lamp post outside 20 Great College Street (Map ref. 126)
- Lamp post outside 16 Great College Street (Map ref. 127)
- Lamp post adjacent to 14 Great College Street (Map ref. 128)
- Lamp post on corner of 3 Great College Street and 5 Little College Street (Map ref. 129)
- Lamp post outside 11 Lord North Street (Map ref. 130)
- Lamp post outside 2 Lord North Street (Map ref. 131)
- Lamp post outside Tufton Court (Map ref. 132)
- Lamp post adjacent to 48 Tufton Street (Map ref. 133)
- Lamp post outside 57b Tufton Street (Map ref. 134)
- Lamp post on corner of Tufton Street and 2 Dean Trench Street (Map ref. 135)
- Lamp post outside Romney House East (Map ref. 136)
- Lamp post on corner of 81 Tufton Street (Map ref. 137)

3.5 As a result, the heritage baseline now comprises 137 receptors, compared to 111 receptors in 2019. An updated Heritage Asset Plan is provided at **Figure 3.1**.



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HERITAGE ASSET PLAN (2018 MAP)

Application Site

Conservation Areas

A. Whitehall CA (WCC)
B. Westminster Abbey and Parliament Square (WCC)
C. Smith Square (WCC)
D. Millbank (WCC)
E. Albert Embankment (Lambeth)
F. Lambeth Palace (Lambeth)

Listed Buildings

Grade I

1. Victoria Tower Lodge and Gates to Black Rod Garden
2. Statuary group of The Burghers of Calais
3. The Great Cloisters, including St Faiths Chapel, The Chapter House, The Parlour, No's 1 and 2 The Cloisters, The Dark Cloisters and Dormitory with The Chapel of St Dunstan (School and Busby Library)
4. Little Deans Yard
5. Little Deans Yard (College of Westminster School)
6. Little Deans Yard Staircase to Doorway and Gateway to School and Busby Library
7. The Deanery and Sub Dean's Residence with The Jericho Parlour
8. Dean's Yard
9. Lambeth Palace
10. Little Deans Yard Ashburnham House
11. Dean's Yard
12. 19, 19A and 20, Broad Sanctuary SW1
13. The Jewel House (Or Tower) of The Palace of Westminster and Former Dock Retaining Walls to Moat Around Jewel House
14. Houses of Parliament and The Palace of Westminster
15. Church of St Margaret, Westminster
16. St John's Smith Square Concert Hall
17. Gates, Railings, Gate Piers to New Palace Yard, Houses of Parliament
18. Westminster Abbey (The Collegiate Church of St Peter)
19. Statue of Robert Clayton at North Entrance to Ward Block of North Wing at St Thomas' Hospital
20. Clerk of The Works Office and The Remains of The Chapel of St Catherine Little Cloisters Lodgings
21. Abbey Precinct Wall

Grade II*

22. Buxton Memorial Fountain, Victoria Tower Gardens
23. 9 and 10–14, Barton Street SW1
24. Bronze Statue of Edward VI at North Entrance to Ward Block of North Wing at St Thomas' Hospital
25. Church of St Mary
26. Tomb of William Sealy in St Mary's Churchyard, Tomb of John Tradescant and His Family in St Mary's Churchyard and Tomb of Admiral Bligh in St Mary's Churchyard
27. 16–19, Great College Street SW1
28. 1–3, 13–19 Cowley Street SW1,
29. 13–19, Lord North Street
30. Middlesex Guildhall
31. 6–9, Smith Square SW1
32. Ninth Church of Christ Scientist
33. 1, 2, 3 and 5, Smith Square SW1
34. Number 7 (Including Former No 6)
35. The Church Commissioners
36. Numbers 2, 4, 5, 7, 8, 10 and 11, Lord North Street
37. 9, Little College Street SW1
38. 1, 3–6, Barton Street SW1
39. Knife Edge Two Piece Sculpture

Grade II

40. Rogers House
41. Number 83 and Gate Piers Between Rogers House and Tothill House
42. 5 Lamp Standards Lettered G
43. Little Deans Yard Turle's House
44. Abbey (Canons') Garden 4 Statues
45. Abbey Precinct Railings to West of Abbey and to East End and Abbey Close
46. 8, Barton Street SW1
47. 36–40, Great Smith Street SW1
48. "Number 22 including The Chapel of St Peter and St John St Edward's House including St Edward's Chapel"
49. 17–21, Gayfere Street SW1
50. Lampstandard Numbered G1 on Corner of Smith Square
51. 2 and 4, Dean Trench Street SW1 (See Details For Further Address Information)
52. Block 9 of St Thomas's Hospital Medical School
53. "Lambeth Palace Cottages Wall to East of Lambeth Palace Courtyard"
54. Fifteen Public Benches on Embankment Footpath Between Lambeth Bridge and Westminster Bridge
55. Wall to West of The Great Hall at Lambeth
56. Wall Along Western Boundary of St Thomas' Hospital
57. Gayfere Lodge, 7, Gayfere Street SW1, 10 and 11, Gayfere Street SW1
58. Orchard House
59. Park House
60. Abbey (Canons') Garden
61. 10–12, Little College Street SW1 and Lampstandard Numbered G1
62. 2 Bollards flanking junction of Smith Square and Lord North Street, and 13 Stone Bollards on Pavement Curb Surrounding St John's Smith Square Concert Hall
63. Norwest House
64. Statue of George V
65. Statue of Richard I
66. Statue of Oliver Cromwell in Front of Westminster Hall
67. St Margaret's Churchyard Railings, Obelisks and Bollards
68. 14 Lampstandards flanking Carriage Drive in New Palace Yard, Houses of Parliament
69. 6 Lampstandards in St Margaret's Churchyard Lettered G
70. Thorney House
71. 36 and 37, Smith Square SW1
72. Millbank Tower
73. 57 and 57A, Tufton Street
74. K6 Telephone Kiosk, Lambeth Palace Road/ Albert Embankment
75. Millicent Fawcett Hall
76. Monument to Christopher Cass The Elder on East Side of St John's Gardens
77. Number 90 including Railings
78. Church House
79. 7 Lampstandards Numbered G4, 5 and 6 and G9, 10, 11 and 12
80. Statue of Abraham Lincoln in Front of Middlesex Guildhall
81. Thames House (North and South Blocks with Bridge Link)
82. Westminster Public Library
83. Morland House, Millbank Estate
84. Corner House
85. Church of St Matthew and St Matthew's Clergy House
86. Lampstandard Numbered G1 on Corner of Smith Square
87. 4, Cowley Street SW1
88. The Sanctuary
89. 1, and 3, Dean Trench Street SW1
90. North House and Gayfere House
91. 62 and 64, Horseferry Road SW1 (See Details For Further Address Information)
92. Little Deans Yard
93. Dean's Yard, Abbey Shop, Choir School, 3 Lamp Standards to South End Outside No 5A and Church House, 10 Lamp Standards Round Central Green of Dean's Yard
94. Crimean War and Indian Mutiny Memorial
95. Faith House
96. River Embankment From The Houses of Parliment to Lambeth Bridge
97. Statue of Mrs Emmeline Pankhurst
98. Number 34 and Gate Piers at Entrance to Edric House, Grosvenor Estate, Edric House, No 32 and Gate Piers Between Bennett House and Edric House, Grosvenor Estate, and Bennett House, Grosvenor Estate (With Lodge and Gate Piers)
99. South Wing at St Thomas' Hospital Excluding Post 1926 Courtyard Infill Buildings
100. Wall on South Side of Main Courtyard at Lambeth Palace
101. Mounting Block to East of Entrance to Lambeth Palace Residential Apartments
102. Walls, Railings, Gates, and Gate Piers to South and West of Church of St Mary
103. Mary Sumner House
104. Statue of Sir Winston Churchill, Statue of Field Marshal Jan Smuts, Statue of Edward Stanley, Earl of Derby, Statue of Benjamin Disraeli, Earl of Beaconsfield, and Statue of Sir Robert Peel
105. Lambeth Bridge and Attached Parapets, Light Standands, Associated Walls to Approaches and Obelisks

World Heritage Site

106. Palace of Westminster, Westminster Abbey and St. Margaret's Church

Scheduled Monuments

107. The Chapter House and Pyx Chamber in the abbey cloisters, Westminster Abbey
108. The Jewel Tower

Registered Park and Gardens

109. Parliament Square
110. Victoria Tower Gardens
111. Lambeth Palace

LOCATION:
Holocaust Memorial, Victoria Tower Gardens

DATE:
October 2025

SCALE:
1:5,000 @ A3

FIGURE 3.1 Heritage Asset Plan, 2026.

▲ **NORTH**

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UPDATES TO ASSESSMENT

PALACE OF WESTMINSTER, WESTMINSTER ABBEY AND ST MARGARET'S CHURCH WORLD HERITAGE SITE - MAP REF. 106

3.6 The following provides an assessment of the proposals on The Palace of Westminster, Westminster Abbey and St Margaret's Church World Heritage Site ('Westminster World Heritage Site' or 'WHS') in accordance with the 2022 UNESCO Toolkit, in order to bring the assessment in line with current best practice guidance.1

3.7 In relation to the Westminster WHS, the salient consideration is whether the Proposed Development (or 'Proposed Action' to use the terminology of UNESCO's Toolkit) would preserve or enhance the Outstanding Universal Value ("OUV") of the Westminster WHS, situated to the north of the Victoria Tower Gardens.

CONTRACTUAL INFORMATION AND ACKNOWLEDGEMENTS

3.8 In accordance with the suggested table 6.3 (page 48) of the 2022 UNESCO Toolkit, we provide the following contractual information and acknowledgements.

3.9 This assessment has been prepared on behalf of and funded by the Applicant, MHCLG.

3.10 This assessment is presented as part of an addendum to an ES application, and it is expected that the City of Westminster will review the assessment as part of the formal application process, along with the Minister of State for Housing, Historic England and local stakeholder groups.

3.11 The assessment has been prepared by Kate Falconer Hall, Ben Clark, and Sophie Kenworthy of the Historic Environment and Townscape team at Montagu Evans. It is confirmed that Montagu Evans have no conflict of interest.

3.12 The authors of this assessment completed a site visit in September 2025 and finalised this report in February 2026. The understanding of the area and heritage context has been informed by Montagu Evans' previous experience of working in the City of Westminster.

3.13 The 'Proposed Action' (using the terminology of the UNESCO Toolkit) has previously been presented to the City of Westminster and the Minister of State for Housing through the original ES (2018) application and Addendum (2019). The Design and Access Statement prepared by Adjaye Associates explains the evolution of the design process.

SCREENING/SCOPING

3.14 The Site is located to the south of the Westminster World Heritage Site. It comprises a large area within Victoria Tower Gardens (Grade II RPG), which contributes positively to the World Heritage Site's setting.

3.15 The Proposed Action is for the redevelopment of part of Victoria Tower Gardens to create a memorial to the Jewish people of Europe and all other victims of the Nazi persecution, with an exhibition which will set the Holocaust within the British narrative.

3.16 The location, extent, OUV and Attributes of the World Heritage Sites are summarised below.

DESCRIPTION OF THE WHS

3.17 The WHS was inscribed in 1987, and its boundaries modified in 2008. It comprises 10.26 hectares (ha) within the City of Westminster, next to the River Thames (see **Figure 4.1**).

3.18 The World Heritage Site does not have a Buffer Zone. The Proposed Action would not affect the setting of the World Heritage Site.

3.19 The designation encompasses the Houses of Parliament on the east side of Abingdon Street and Westminster Abbey to its west; as well as the enclave of historic development arranged around Dean's Yard, the cloisters and Abbey Gardens to the south. The character of the WHS as a whole is varied, with Westminster Abbey and the Palace of Westminster forming prominent landmarks which contrast in scale with the quieter, more enclosed spaces to the southwest.

3.20 The Westminster World Heritage Site was inscribed based on three of the 10 selection criteria 2:

3.20.1 Criteria (i) – "to represent a masterpiece of human creative genius";

3.20.2 Criteria (ii) – "to exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design"; and

3.20.3 Criteria (iv) – "to be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history".

3.21 The OUV of the Westminster World Heritage Site is described in the The Palace of Westminster and Westminster Abbey including St Margaret's Church World Heritage Site Management Plan (2007) (the '2007 Management Plan').

3.22 In accordance with the 2022 UNESCO Toolkit, a preliminary assessment of whether the Proposed Action will significantly affect the Attributes and the OUV of the World Heritage Site is provided in **Table 4.1**. Those Attributes that may be affected by the Proposed Action are considered in more detail in the further assessment stages.

1 UNESCO, 2022. Guidance and Toolkit for Impact Assessments in a World Heritage Context. Available at: https://whc.unesco.org/en/guidance-toolkit-impact-assessments/ [accessed September 2025]

2 https://whc.unesco.org/en/criteria/

BASELINE ASSESSMENT

ATTRIBUTES OF OUV

3.23 The Attributes of the OUV of the World Heritage Site are identified in **Table 3.1** below, along with a preliminary assessment of whether the Proposed Action for the Site would affect the Attributes of OUV.

ATTRIBUTE OF OUV	PROPOSED ACTION
The importance, as a group, of the three buildings of the Palace of Westminster, Westminster Abbey and St Margaret's Church.	The Proposed Action would be located to the south of this ensemble.
The Palace as a supreme example of Gothic Revival and the work of Sir Charles Barry and AW Pugin.	The Proposed Action would not affect the Palace of Westminster or its setting.
The surviving buildings of the medieval Palace of Westminster, notably the internationally important Westminster Hall and the Jewel Tower.	The Proposed Action would not affect Westminster Hall or the Jewel Tower.
Westminster as the site of the development of parliamentary ideals since the 13th century and as the pre-eminent symbol of the democratic institution.	The Proposed Action would not affect any buildings or spaces associated with the development of parliamentary ideals.
Westminster Abbey as a major ecclesiastical monument of great antiquity and beauty	The Proposed Action would not affect Westminster Abbey or its setting.
Westminster Abbey as the place of coronation and shrine of British monarchs since the 11th century and the place where the nation's important statesmen, poets and other individuals are commemorated.	The Proposed Action would not affect the intangible, cultural and commemorative aspects of Westminster Abbey.
St Margaret's Church as the church of the House of Commons.	The Proposed Action would not affect the use of St Margaret's Church by the House of Commons

Table 3.1 Attributes of WHS OUV.

SUMMARY OF OUV

3.24 The World Heritage Site derives its OUV from the interaction between the nation's most significant governmental and ecclesiastical buildings, which collectively form an internationally recognisable ensemble representative of the British state, developed over almost a thousand years.

3.25 In addition to the historic fabric of the WHS, that is the buildings, spaces, monuments, interior decoration and other artefacts, Westminster Palace and Westminster Abbey including St Margaret's Church embody other elements of heritage. These intangible elements include the continuity of use of most of the buildings since they were first founded or built, the staging of national ceremonies and celebrations, the history of the development of the systems of parliament, British sovereignty and constitutional monarchy and law at Westminster, key historic events and the commemoration of nationally and internationally important individuals in the Abbey.

3.26 The WHS meets UNESCO's selection criteria in the following ways:

- Criterion (i): Westminster Abbey is a unique artistic construction representing a striking sequence of the successive phases of English Gothic art.
- Criterion (ii): Other than its influence on English architecture during the Middle Ages, the Abbey has played another leading role by influencing the work of Charles Barry and Augustus Welby Pugin in Westminster Palace, in the "Gothic Revival" of the 19th century.
- Criterion (iv): The Abbey, the Palace, and St Margaret's illustrate in a concrete way the specificities of parliamentary monarchy over a period of time as long as nine centuries. Whether one looks at the royal tombs, the Chapter House, the remarkable vastness of Westminster Hall, of the House of Lords, or of the House of Commons, art is everywhere present and harmonious, making a veritable museum of the history of the United Kingdom.

3.27 The Proposed Action would not affect any Attribute of the Westminster WHS OUV, or the reasons for its selection, and no further assessment of these is required.

OTHER VALUES

3.28 In addition to the Attributes of the OUV outlined above there are other values that are considered in the context of the World Heritage Site.

3.29 The 2007 Management Plan identifies Westminster's overarching significances as follows:

3.30 As a place where sovereignty has been conferred and exercised continuously for nearly a thousand years;

3.31 In the development of parliamentary government and its transmission around the world;

3.32 As the place from which a significant part of the world was ruled in the 19th and first half of the 20th centuries;

3.33 For the outstanding architectural and artistic value of its buildings and their contents.

3.34 The 2007 Management Plan also identifies the following key qualities which give the WHS its OUV:

- Symbolic and spiritual significance
- Political significance
- Historic Significance
- Architectural Significance
- Works of art, fittings, furnishings and archives
- Intellectual significance
- Public significance

CONTRIBUTION OF SETTING TO HERITAGE VALUE

3.35 The World Heritage Site is set adjacent to the river, within the centre of modern London. The Statement of OUV states that *"the distinctive skyline is still prominent and recognisable despite the presence of a few tall buildings as part of the property... however important views of the property are vulnerable to development projects for tall buildings."*

3.36 The Thames is an important feature in the setting of the World Heritage Site; both as one of the historic routes by which visitors would have arrived at the Palace of Westminster, and as a wide, open space which allows for a wide range of views towards the buildings. The importance of key views towards the WHS is recognised by their inclusion in the LVMF. The open space of the river also allows for an appreciation of the historic interaction between the Palace of Westminster, as the historic seat of the Monarchy, and Lambeth Palace, that of the Archbishopric of Canterbury.

3.37 Adjacent to the north west of the WHS is Parliament Square, a busy traffic interchange arranged around a rectilinear Registered Park. The open space of the park contains a number of listed monuments and statues, which collectively contribute to the area's legibility as the seat of the British state. The heavy traffic is identified in the WHS Management Plan (2007) as a negative feature which detracts from the appreciation of the historic ensemble.

3.38 To the south, Victoria Tower Gardens is an important open space in the setting of the WHS, which provides relief from the heavily urbanised environment on the north bank of the river. The park's enclosed character and linear arrangement adjacent to the river makes a positive contribution to the setting of the WHS, and allows for an appreciation of the Victoria Tower from the south. In views north east along Millbank and Abingdon Street, as well as from the Albert Embankment on the opposing bank of the river, the dense tree line within the park forms an important part of the setting of the WHS buildings, creating a neutral backdrop which allows the world famous silhouette of the Palace of Westminster to remain pre-eminent.

3.39 The Site makes a positive contribution to the setting of the World Heritage Site through its appearance in important LVMF views, and as a place from which Victoria Tower in particular can be appreciated. It also forms a rare open space in the environs of the WHS, which contrasts with the busy, heavily trafficked environment beyond.

ASSESSMENT OF EFFECTS

3.40 The following assessment of impact has followed the steps outlined in ICOMOS's 2022 Toolkit to bring the HTVIA up to date with the latest guidance.

3.41 The brief synthesis of the site's Outstanding Universal Value (OUV) states that "The Palace of Westminster, Westminster Abbey and St Margaret's Church together encapsulate the history of one of the most ancient parliamentary monarchies of present times and the growth of parliamentary and constitutional institutions.

3.42 In tangible form, Westminster Abbey is a striking example of the successive phases of English Gothic art and architecture, and the inspiration for the work of Charles Barry and Augustus Welby Pugin on the Palace of Westminster."

3.43 As such, the site forms a physical manifestation of the power and influence of the intertwined powers of the church, monarchy and state. The buildings retain their historic uses and their proximity contributes to their collective importance.

3.44 The receptor continues to be of **Very High** value.

3.45 The appreciation of the Victoria Tower from the south is an important part of this setting relationship, as is the contrast between the dense, heavily treed space within the park, and the protected silhouette of the WHS buildings as seen in river views.

THE PROPOSED ACTION AND ALTERNATIVES

3.46 The Proposed Action is described in the Design and Access Statement by Adjaye Associates.

3.47 The Proposed Action would have an indirect impact on the Westminster WHS by introducing a change to the character and appearance of Victoria Tower Gardens, which makes a positive contribution to its setting, through the development of a memorial to the Jewish people of Europe and all other victims of the Nazi persecution.

3.48 The scope of the proposals is limited relative to the size of the WHS as a whole. Owing to the limited scope of the proposals, which have sought to avoid harm to heritage assets wherever practicable, the only alternative scheme would be 'no project'. In this instance, Victoria Tower Gardens would remain in its current form and use as a park, and its current setting contribution to the Westminster WHS would be unchanged.

CONCLUSION

3.49 Following the updated ICOMOS guidance, we conclude that the effects of the Proposed Development on the WWHS would remain as Negligible for the Construction Phase and Moderate Beneficial for the Operational Phase.

MEMORIAL TO EMMELINE AND CHRISTABEL PANKHURST (GRADE II*) - MAP REF. 97

UPDATE TO BASELINE

3.50 The Memorial to Emmeline and Christabel Pankhurst was added to the statutory list in 1970 but was upgraded to Grade II* in December 2018.

3.51 According to the statutory listed description, the receptor is listed Grade II* for the following principal reasons:

Architectural interest:

** as a finely crafted piece of commemorative sculpture which brings together the work of several noted artists and architects;*
** in the full-body bronze by Arthur George Walker which captures well the likeness of Pankhurst in an expressive but naturalistic style, depicting her in characteristic dress and pose;*
** in its depiction of Pankhurst, choice of inscription and location, the memorial bears witness to the struggle and success of the movement she led;*
** in the quality of the later expansion which gives additional presence to an already strong work and echoes the original design for the base of the memorial which Walker had proposed.*

Historic interest:

** for its commemoration of a major figure of the C20 whose contribution to the fight for women's enfranchisement was recognised by the establishment she committed her life to challenging;*
** for its rarity in commemorating a woman, for the exceptional nature of her achievements as the leader of the militant suffrage campaign, and the fact that it was commissioned by the women she led;*

** in its later commemoration of Christabel Pankhurst and the women of the WSPU the memorial commemorates the militant suffrage campaign as well as the figures who led it;*
** in marking the year of Pankhurst's death the monument also marks the point at which the campaign for women's suffrage achieved its ultimate objective: a seminal moment in British history and in the advancement of women's rights.*

3.52 The value of this receptor has been upgraded from Medium to High in accordance with our methodology.

3.53 However, we do not identify any aspects of the receptor's setting that contribute to its increased heritage value.

UPDATE TO ASSESSMENT OF EFFECTS

3.54 Following the upgrading of the Memorial of the Emmeline and Christabel Pankhurst from Grade II to Grade II*, it's sensitivity is increased from Low to Moderate.

3.55 In a strict application of the matrices, the Low magnitude of impact deriving from the Construction Phase would result in a Low/Moderate Adverse effect. This effect would be indirect, local and temporary.

3.56 In the Operational Phase, the magnitude of impact would remain as **Negligible**. The likely significant effect would, therefore, be **Negligible**. This effect would be indirect, permanent, and local.

26 LAMP POSTS SURROUNDING SMITH SQUARE (GRADE II) - MAP REFS. 112-137

BASELINE VALUE

3.57 These receptors were added to the statutory list in 2024. The lamp posts are located along key streets within the Smith Square area, and therefore fall within the Study Area.

3.58 The lamp posts have been grouped based on the consistency of their characteristics and close proximity. The collection of lamp posts possess historic and architectural interest as remnants of 19th and 20th historic street furniture. They consist of well-crafted decorative column designs which illustrate the evolution of gas lighting technology.

3.59 The immediate setting of the receptors is shaped by the layout of Smith Square, which retains its 18th century arrangement. The square is an enclosed and complementary environment that enhances the understanding of the assets within their historic context.

3.60 The areas beyond the square contribute less to the heritage significance of the receptors. The busy traffic along Millbank to the east reinforces the urban character of the location, while the dense tree cover within Victoria Tower Gardens provides a visual contrast.

3.61 The value of these receptors are Medium.

ASSESSMENT OF EFFECTS

3.62 The Lampstandards are situated within the planned arrangement at Smith Square, and form part of the historic street furniture in the area. The experience of the receptors is primarily focused on their immediate context within the Smith Square development. The space outside of the planned arrangement makes a very limited contribution to their setting.

3.63 The Proposed Development may be visible in some views along Great College Street, but this would be understood separately from the historic arrangement at Smith Square.

3.64 Whilst the change may be perceptible from within the wider setting of the receptors, this would have no effect on their heritage value, or the appreciation thereof.

3.65 Therefore, the magnitude of impact would be Neutral. The likely significant effect would be Nil. This effect would be indirect, permanent, and local.

SUMMARY OF KEY HERITAGE EFFECTS

3.66 Due to the minor scale and scope of the modifications, the experience of those elements of the proposals which are the subject of this Addendum would be limited. The heritage receptors which are likely to experience a change as a result of the Proposed Development are:

- The Palace of Westminster and Westminster Abbey including St Margaret's Church World Heritage Site (the WWHS);
- The Houses of Parliament and the Palace of Westminster, itself a grade I listed building;
- Victoria Tower Gardens (grade II Registered Park and Garden);
- Buxton Memorial Fountain (grade II*); and
- The Westminster Abbey and Parliament Square Conservation Area.

WESTMINSTER WHS

3.67 In relation to the Westminster WHS, the salient consideration remains whether the Proposed Development (or 'Proposed Action' to use the terminology of UNESCO's Toolkit) would preserve or enhance the Outstanding Universal Value ("OUV") of the Westminster WHS, situated to the north of the Victoria Tower Gardens. In undertaking our assessment, we have had regard to the ICOMOS 'Guidance and Toolkit for Impact Assessment in a World Heritage context (2022)'. We have relied on the published World Heritage Site Management Plan (2007), which details the reasons for the designation and explains the nature of its OUV. With this in mind, we conclude that the Proposed Development would preserve the OUV of the World Heritage Site, for the following reasons.

3.68 The intrinsic OUV of the WHS site is derived from its collection of the nation's most significant governmental and ecclesiastical buildings, which form an internationally recognisable ensemble representative of the British state, developed over almost a thousand years. This would not change as a result of the Proposed Development, which would be experienced as an element within the setting of the WHS to the south.

3.69 The Victoria Tower Gardens forms an area of open space to the south of the Palace of Westminster which makes an important contribution to the setting and appreciation of the WHS, and to the grade I listed Palace itself. It is a well-used, publicly accessible open space, frequented by visitors to the area, office workers and residents of nearby streets. Its character is affected by the activities found in the area, and by the road traffic to its west and south which continues eastwards across Lambeth Bridge.

3.70 The open character of the northern portion of the park would be preserved, and the new softly sloping landscape creates an attractive feature when viewed from the WHS, and from which visitors to the gardens will be able to appreciate the form of the Victoria Tower from a new, elevated perspective, creating an interesting new viewing position.

3.71 The function of the UKHMLC, dedicated to the victims of injustice and prejudice on an unimaginable scale, is appropriate to the location, and the character of the gardens, which already contains a number of memorials, and this would frame its contribution to the setting of the WHS.

3.72 Whilst the memorial would appear in some views from the south of the park towards the WHS, introducing a new feature in the view of Victoria Tower and associated parts of the Palace, the elevational treatment, scale and form of the above ground elements of the NHM have been designed to respond, and remain subservient to, the Houses of Parliament.

3.73 The impact of the UKHMLC at night has also been considered. This is addressed in more detail in the Visual Impact Assessment but, in brief, the scheme of lighting has been designed so as to preserve the pre-eminence of the Palace of Westminster in night-time views (evening viewing conditions), as well as the relative tranquillity of the space within the park. Therefore, we judge that the ability to appreciate the OUV of the WHS at night will be preserved.

3.74 Additionally, for the reasons explained here, and due to the limited visibility towards the proposed memorial, we conclude that the visual amenity of people experiencing LVMF views towards the World Heritage Site would be preserved.

3.75 The memorial has been conceived of as a powerful statement reflecting the enormity of the event in human history. It is necessarily expressive. From the north, the form has a lyrical character, reminiscent of the romantic tradition of designed landscapes, and its arresting form is revealed gradually as the visitor moves towards the entrance at the south.

3.76 That contrast is part of the design concept, and in assessing the proposals, it would be wrong not to have regard to the whole aesthetic experience, and the refined nature of the fins form sinuous elements which add to the quality of the landscape.

3.77 Nevertheless, aesthetically, there are some adverse visual impacts upon the contained space at the south of the gardens, and its close position relative to the entrance pavilion. These need to be set in the context of the whole, as part of a sequence of views experienced by the visitor.

THE HOUSES OF PARLIAMENT AND THE PALACE OF WESTMINSTER (GRADE I)

3.78 Considering the Houses of Parliament and the Palace of Westminster specifically, the grade I listed building derives its heritage value from its long history as the seat of government, and its combination of surviving medieval elements such as Westminster Hall and St Stephen's Chapel, with Barry and Pugin's 19th century Houses of Parliament. The southernmost element of the building is the Victoria Tower, for which the adjacent park is named.

3.79 Whilst the appreciation of the Victoria Tower in particular would be changed in some views from the south, the opportunity to appreciate that significance would not be harmed. New views from the elevated area of landscaping would create a destination from which to appreciate the buildings from the south, and the location of a memorial close to the Houses of Parliament is an established and entirely appropriate form of development in the buildings' setting. Therefore, we judge that the Proposed Development would preserve the Houses of Parliament, and the ability to appreciate their significance. The high quality of the proposed landscape design and associated structure would be a positive addition to the experience of appreciating this part of the WHS.

VICTORIA TOWER GARDENS (GRADE II)

3.80 We turn now to the Victoria Tower Gardens RPG. The intrinsic character of the RPG is that of a green park within an urban setting, which accrues greater significance from its unique position adjacent to the Westminster World Heritage Site. Its special interest lies in its position relative to the Palaces of Westminster. It provides a green setting, with mature trees, which contribute to the appreciation of the building's Gothic and picturesque qualities, which is reflected in its profile and lively surface detailing.

3.81 The park has developed piecemeal over an extended period, and the Proposed Development provides an opportunity to consider the space therein as a whole. A management plan for the memorial will include provision for the maintenance of the memorial and the green character of the park as a whole.

3.82 The Proposed Development will be an attractive, high quality addition to the collection of memorials located within the Victoria Tower Gardens, the scale and prominence of which is appropriate to its subject matter and responds to its context. The design is distinctive and memorable and will add visual interest to the park, attracting new visitors, and providing the opportunity for contemplation of both the new memorial, and the other memorials already located within the park. Increased activity arising from a greater number of visitors to the attraction will be addressed through a management plan for the facility, set out separately with this application. The landscape is already frequented by many visitors; the new landscape treatment across the whole will make it more accessible and easier to enjoy. As the management proposals show the number of visitors to the attraction at any time would be circa 375 in an hour at peak times, and there are many destinations accessible from this point for those who have visited. We conclude that more visitors will not materially erode the character of the park as an element of the conservation area.

3.83 The basement element of the learning centre will not form part of the experience of the park for casual visitors, and will have no effect upon its character, which will remain that of an urban park within a city centre.

3.84 The memorial will bring new visitors to the park, enabling a greater number of people to experience the memorials contained therein, and the character of the space. The proposals create new views towards the Palace of Westminster from the landscaped slope above the memorial, which will reinforce the setting relationship between the park and the World Heritage Site.

3.85 The proposed memorial is intended to have a certain gravity and presence, and so the design has a distinctive character. We conclude that whilst the proposals will change the character of the space within the park, this change is in keeping with the general character and purpose of the spaces around Parliament which feature memorial sculpture and buildings of a symbolic nature.

3.86 The ability to appreciate the reasons for the park's designation would remain, and its open character would not change. Therefore, we find that any harm to the park arising from the change in the character of the land at the Site would be at the lower end of less than substantial in the terms of the National Planning Policy Framework (NPPF). Any harm caused to the character of the park by the construction of the memorial would be limited, and would have to be balanced against the heritage benefits outlined in Volume 3 of the ES (2018) and Addendum (2019).

BUXTON MEMORIAL (GRADE II*)

3.87 The Buxton Memorial, within the park, commemorates the abolition of the slave trade, and was moved to its present location in the 1950s; its original position was elsewhere in Parliament Square. There is no evidence to suggest this location had any particular positive association, beyond the general and meaningful association with Parliament. Whilst it has recently undergone some restoration work, there is little in the way of interpretation explaining its significance, and its position at the juncture of two paths is not conducive to its meaningful appreciation.

3.88 The Proposed Development seeks to create a landscape scheme in the environs of the Buxton Memorial, and that scheme will enhance the opportunity to appreciate the form of the new structure, and its commemorative function. Whilst we acknowledge that some views of the Buxton Memorial Fountain, including from the north-west side of Victoria Tower Gardens to the south toward the memorial, will be obscured, these are incidental, and the opportunity to improve its immediate setting will benefit the opportunity to appreciate the memorial's significance. Therefore, on balance, we judge that the intrinsic heritage value of the memorial, and the ability to appreciate that significance, will be enhanced as a result of the Proposed Development.

WESTMINSTER ABBEY AND PARLIAMENT SQUARE CONSERVATION AREA

3.89 Turning finally to the Westminster Abbey and Parliament Square Conservation Area, we note that the intrinsic character of the Conservation Area is derived from its range of historic buildings and spaces focused at the centre of Westminster; including both the monumental, civic buildings of the Houses of Parliament and Westminster Abbey, and the quieter, semi-private areas around Dean's Yard and the cloisters. Victoria Tower Gardens is an important open space within the Conservation Area, and a number of important views are identified in the Conservation Area Appraisal.

3.90 The Proposed Development will be an attractive, high-quality addition to the memorials within the Victoria Tower Gardens, performing a function which is in keeping with the character of the space. The scale and materiality of the memorial respond to the built form in the surrounding environment, and in terms of scale, it sits significantly lower than the surrounding buildings to the north.

3.91 The intrinsic character of this part of the Conservation Area will not change, and whilst the memorial will be a noticeable addition to the space, and to some views, it would not fundamentally change the character of the Conservation Area as a whole. Its appearance, and its meaningful purpose, would therefore make a positive contribution to the Westminster Abbey and Parliament Square Conservation Area. Comments made earlier, on the potential change to character from increased visitor numbers, apply here equally.

SUMMARY

3.92 The salient consideration as applicable to this Addendum is whether the Proposed Development as amended will preserve or enhance the value of heritage receptors within the Study Area.

3.93 Our assessment finds that there will be no meaningful change to the effects identified at Volume 3 of the ES (2018) on the remaining heritage receptors in the study area.

MAP REF.	RECEPTOR	HERITAGE VALUE	SENSITIVITY	LIKELY EFFECT (SITE PREPARATION AND CONSTRUCTION) 2018	LIKELY EFFECT (OPERATIONAL) 2018	LIKELY EFFECT (SITE PREPARATION AND CONSTRUCTION) 2019	LIKELY EFFECT (OPERATIONAL) 2019	LIKELY EFFECT (SITE PREPARATION AND CONSTRUCTION) 2026	LIKELY EFFECT (OPERATIONAL) 2026
106	Palace of Westminster, Westminster Abbey and St Margaret's Church World Heritage Site	Very High	High	Negligible	Moderate Beneficial	Negligible	Moderate Beneficial	Negligible	Moderate Beneficial
2	Statuary Group of the Burghers of Calais	High	Moderate/High	Temporary Minor Adverse	Moderate Beneficial	Temporary Minor Adverse	Moderate Beneficial	Temporary Minor Adverse	Moderate Beneficial
14	Houses of Parliament and the Palace of Westminster	High	Moderate/High	Negligible	Moderate Beneficial	Negligible	Moderate Beneficial	Negligible	Moderate Beneficial
22	Buxton Memorial Fountain, Victoria Tower Gardens	High	Moderate/High	Temporary Minor Adverse	Moderate Beneficial	Temporary Minor Adverse	Moderate Beneficial	Temporary Minor Adverse	Moderate Beneficial
96	River Embankment from the Houses of Parliament to Lambeth Bridge	Medium	Low/ Moderate	Temporary Minor Adverse	Minor Beneficial	Temporary Minor Adverse	Minor Beneficial	Temporary Minor Adverse	Minor Beneficial
97	Memorial to Emmeline and Christabel Pankhurst	High	Moderate	Temporary Minor Adverse	Negligible	Temporary Minor Adverse	Negligible	Temporary Minor/Moderate Adverse	Negligible
110	Victoria Tower Gardens	Medium	Moderate	Temporary Minor Adverse	Moderate Beneficial	Temporary Minor Adverse	Moderate Beneficial	Temporary Minor Adverse	Moderate Beneficial
B	Westminster Abbey and Parliament Square Conservation Area	High	Moderate/ High	Temporary Minor Adverse	Moderate Beneficial	Temporary Minor Adverse	Moderate Beneficial	Temporary Minor Adverse	Moderate Beneficial

Table 3.2 Summary of key Heritage Effects

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4.0
TOWNSCAPE ADDENDUM
UNITED KINGDOM HOLOCAUST MEMORIAL AND LEARNING CENTRE

TOWNSCAPE ADDENDUM

4.1 Townscape Character Areas (TCAs) are identified and described at **Section 6.0** of Volume 3 of the ES. The effects of the proposals is assessed in full at **Section 9.0** of that volume.

4.2 For clarity, we have included the Townscape Character Area Plan at **Figure 4.1**. The townscape character areas remain as those identified in Volume 3 of the ES.

UPDATES TO BASELINE

4.3 A site visit conducted in 2025 confirmed that construction activity is currently underway within TCA1. The Buxton Memorial is undergoing restoration works and is therefore temporarily under construction. Despite these works, the townscape value of the area remains High.

4.4 It was also observed that construction activity is currently taking place within TCA 10 at 7 Millbank. This site was under scaffolding at the time of the 2018 submission and the buildings have since been demolished. The townscape value remains Medium.

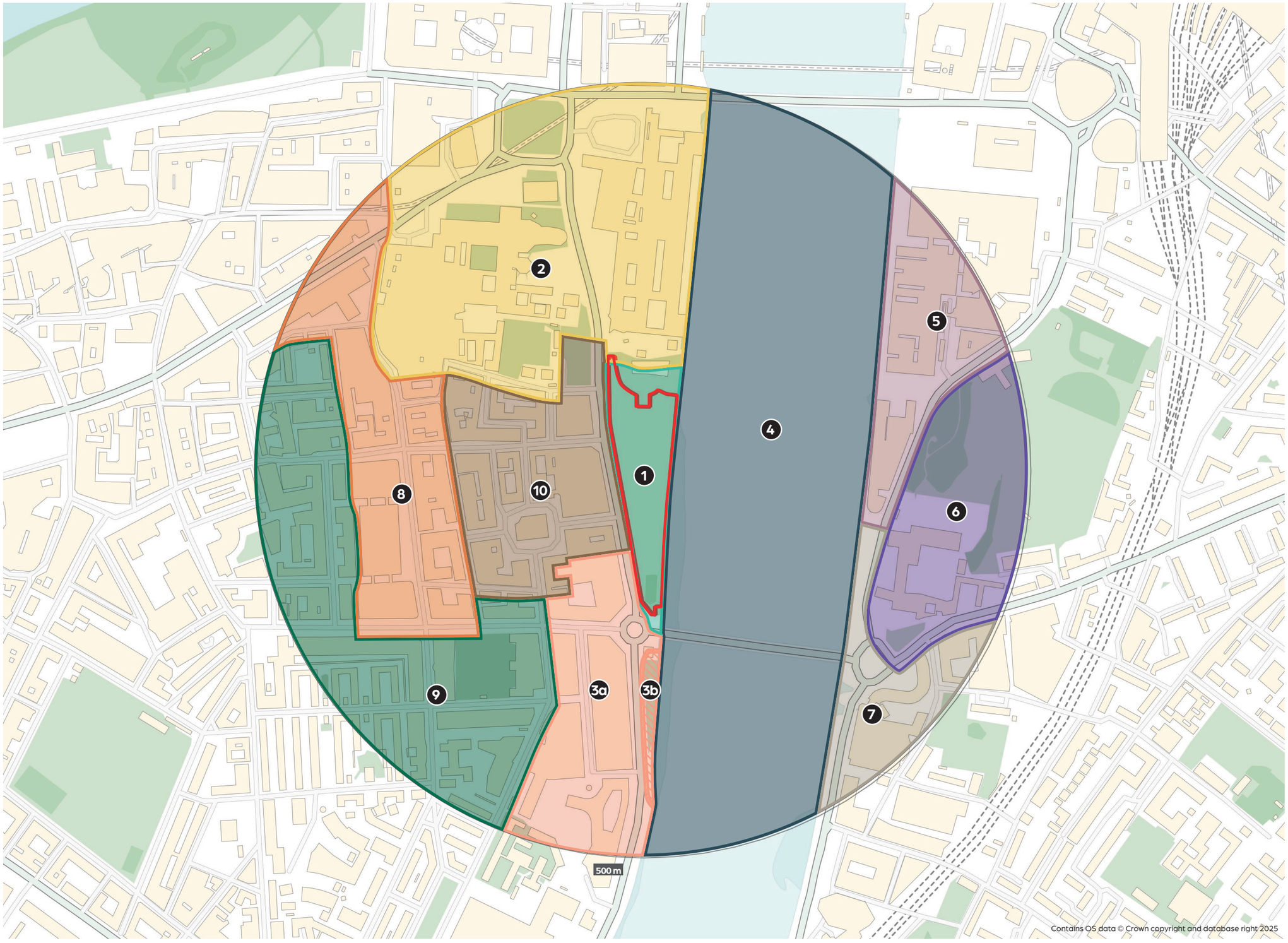
UPDATES TO ASSESSMENT OF EFFECTS

4.5 Due to the limited scope of the proposed modifications, we do not identify any change to the effects on the TCAs identified at **Section 9.0** in Volume 3 of the ES (2018) at either Construction Phase or Operational Phase.

SUMMARY OF KEY EFFECTS

4.6 With regard to townscape, the Proposed Development is situated within an area characterised as urban parkland, with mature trees, areas of open space and a riverside setting. The site is also recognised, and has been accepted as, one of importance to the setting of adjacent character areas, including that of the Westminster WHS and Parliament Square to the north, which has a contrasting, highly urbanised character.

4.7 Overall, the creation of a new memorial with associated landscaping complements the use and functioning of the existing park. There will be greater vitality and activity, including more visitors to the park, the impact of whom will be mitigated through a careful Visitor Management Strategy. The additional visitors will also be mitigated through careful landscape management. The new landscaping will be an attractive feature which will be beneficial to visual amenity, and whilst the memorial itself will intensify the commemorative function of the park, this is not a departure from its existing character. The basement element of the learning centre will not affect the character of the park space, or be a notable element to the casual visitor.



TOWNSCAPE CHARACTER AREAS PLAN

1. Victoria Tower Gardens
2. Westminster WHS and Parliament Square

3a. Millbank

3b. Victoria Tower Gardens South

4. The River Thames
5. St Thomas Hosppital
6. Lambeth Palace
7. Albert Embankment
8. Gait Offices
9. Residential Development adjacent to Westminster
10. Smith Square

LOCATION:
Holocaust Memorial, Victoria Tower Gardens

DATE:
October 2025

SCALE:
1:5,000 @ A3

FIGURE 4.1 Townscape Character Area Plan.

▲ **NORTH**

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MAP REF.	ASSET	LIKELY EFFECT (SITE PREPARATION AND CONSTRUCTION) 2018	LIKELY EFFECT (OPERATIONAL) 2018	LIKELY EFFECT (SITE PREPARATION AND CONSTRUCTION) 2019	LIKELY EFFECT (OPERATIONAL) 2019	LIKELY EFFECT (SITE PREPARATION AND CONSTRUCTION) 2026	LIKELY EFFECT (OPERATIONAL) 2026
1	Victoria Tower Gardens	Temporary Minor Adverse	Moderate Beneficial	Temporary Minor Adverse	Moderate Beneficial	Temporary Minor Adverse	Moderate Beneficial
2	Westminster World Heritage Site and Parliament Square	Temporary Negligible	Moderate Beneficial	Temporary Negligible	Moderate Beneficial	Temporary Negligible	Moderate Beneficial
3a	Millbank	Temporary Negligible	Minor Beneficial	Temporary Negligible	Minor Beneficial	Temporary Negligible	Minor Beneficial
3b	Victoria Gardens South	Temporary Negligible	Negligible	Temporary Negligible	Negligible	Temporary Negligible	Negligible
4	The River Thames	Temporary Negligible	Minor Beneficial	Temporary Negligible	Minor Beneficial	Temporary Negligible	Minor Beneficial
5	St Thomas' Hospital	Temporary Negligible	Minor Beneficial	Temporary Negligible	Minor Beneficial	Temporary Negligible	Minor Beneficial
7	Albert Embankment	Temporary Negligible	Minor Beneficial	Temporary Negligible	Minor Beneficial	Temporary Negligible	Minor Beneficial
10	Smith Square	Temporary Negligible	Minor Beneficial	Temporary Negligible	Minor Beneficial	Temporary Negligible	Minor Beneficial

Table 4.1 Summary of key Townscape Effects

5.0
VISUAL IMPACT ADDENDUM
UNITED KINGDOM HOLOCAUST MEMORIAL AND LEARNING CENTRE

VISUAL IMPACT ADDENDUM

5.1 This section assesses any change to the likely e□ect of the Proposed Development on visual receptors from that identified at **Section 10.0** of Volume 3 in the ES (2018) and the Addendum (2019)

5.2 The Addendum is supported by accurate visual representations (AVRs) of the Proposed Development from the 23 viewpoints identified previously.

5.3 Following a site visit at the end of 2025 and a review of the previous AVR photography, it was noted that in many of the local views, there have been no significant changes to the surrounding context. The Buxton Memorial is currently under scaffolding due to refurbishment works. As such, the existing AVR material from 2018 and 2019 have been used to illustrate the local views and to support an understanding of the visual relationship between the application site and its surroundings.

5.4 From some viewpoints, recent changes to the existing townscape context have altered the background of the views. Given the sensitivity of the Site's locality, a number of views have been rephotographed to accurately reflect the current conditions. The full list of viewpoints that have been rephotographed is as follows:

- LVMF 18A.1: Westminster Bridge upstream
- LVMF 18A.2: Westminster Bridge upstream
- LVMF 22A.2: Albert Embankment opposite the Palace of Westminster
- LVMF 22A.3: Albert Embankment opposite the Palace of Westminster
- Local View 5: River Thames
- LVMF 22A.1: Albert Embankment opposite the Palace of Westminster
- Representative View 16: TC6A
- Representative View 18: TCA3
- Representative View 21: TC6C
- Representative View 22: Victoria Tower Gardens
- Representative View 23: South of Victoria Tower Gardens

5.5 The location of the AVRs is provided at **Figure 5.1**. Each of these viewpoints are reproduced at **Appendix 2.0** in the following formats:

- Existing – baseline photography;
- Proposed – 'existing' plus wire line (AVR Level 1) or render (AVR Level 3) of the Proposed Development; and
- Cumulative – 'proposed' plus material consents surrounding the application site.

5.6 A comparison study of 2019 and 2025 'Proposed' views, prepared by Hayes Davidson, is provided at **Appendix 3.0**. Detailed information on the AVR production methodology is provided at **Appendix 4.0** to this report.

5.7 **Table 5.2** below provides an overview of the heritage and townscape considerations for each view, including any additional considerations such as the proximity to key transport nodes, as well as any changes to the view since 2019.

5.8 For the full Visual Assessment, please see **Section 10.0** of Volume 3 to the ES (2018) and the Addendum (2019), in conjunction with which this section should be read.

UPDATES TO THE CUMULATIVE BASELINE

5.9 This Addendum has had regard to the additive effect of cumulative schemes: i.e. the 2026 Scheme on the cumulative baseline. Material changes to the cumulative baseline since the original application were identified during a site visit in September 2025.

5.10 The majority of the cumulative schemes within a 1km radius of the Site would not be seen together with the Proposed Development. Therefore, only those cumulative schemes close to the Site have been considered further in order to determine whether the assessment of the Proposed Development may be affected by the cumulative scenario. **Table 5.1** identifies the relevant cumulative schemes.

CUMULATIVE SCHEME	DESCRIPTION OF CUMULATIVE SCHEME
Westminster House, 7 Millbank (21/01508/FULL). Permission granted February 2022. Construction ongoing.	Demolition of existing office building, including dismantling of the facades to Millbank, Dean Stanley Street and Smith Square; erection of new nine storey building using new and reclaimed materials for commercial business and service use (Class E); extension to Smith Square; excavation of new sub-basement; formation of external terraces at sixth, seventh and eighth floor levels; new main entrance to Dean Stanley Street with secondary and servicing entrances to Smith Square; installation of plant and associated works.

Table 5.1 Summary of relevant cumulative schemes

VIEW LOCATION PLAN

LVMF Views

Local Views

Locations

1. LVMF 18 A.2 – Westminster Bridge upstream*
2. LVMF 18 A.1 – Westminster Bridge upstream*
3. LVMF 22 A.3 – Albert Embankment opposite the Palace of Westminster*
4. LVMF 22 A .2 – Albert Embankment opposite the Palace of Westminster*
5. River Thames*
6. LVMF 22 A.1 – Albert Embankment opposite the Palace of Westminster*
7. LVMF 19 A.2 – Lambeth Bridge downstream
8. LVMF 19 A.1 – Lambeth Bridge downstream
9. TC4
10. MI5 (a and b)
11. Millbank towards North
12. Horseferry Street
13. Dean Stanley Street
14. Great Peter Street
15. Great College Street
16. TC6A*
17. TC3B
18. TC3A*
19. TC2
20. TC6D
21. TC6C*
22. Victoria Tower Gardens*
23. Southern Extent of Victoria Tower Gardens*

* **PLEASE NOTE:**
These views include infromation for both 2018 and 2025 information

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LOCATION:
Holocaust Memorial, Victoria Tower Gardens

DATE:
October 2025

SCALE:
1:5,000 @ A3

FIGURE 5.1 View Location Plan.

▲ **NORTH**

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NUMBER	LOCATION	TOWNSCAPE CHARACTER	HERITAGE ASSETS	VISUAL RECEPTORS	AVR TYPE	CHANGES	VIEW RESHOT IN 2025?	RATIONALE
1	LVMF 18A.2 – Westminster Bridge Upstream	Open Space Riverine Commercial Governmental Residential	Palace of Westminster, Westminster Abbey and St Margaret's Church World Heritage Site South Wing at St Thomas' Hospital Excluding post-1926 Courtyard Infill Buildings (grade II) Victoria Tower Gardens (grade II RPG) Houses of Parliament and the Palace of Westminster (grade I) Millbank Tower (grade II) Lambeth Bridge (grade II) Westminster Abbey and Parliament Square Conservation Area	Pedestrians Road Users	AVR1 (Wireline)	Elizabeth Tower no longer under scaffolding, cumulative changes to the rear of the view.	Yes	To pick up changes to the cumulative scenario. Whilst scaffolding around Elizabeth House has been removed since the 2018 assessment was undertaken, the original assessment was undertaken on the assumption that the works in question would eventually be completed. with the Visual Amenity Value assigned as 'Very High' accordingly. The baseline condition would remain as per the 2018 assessment.
2	LVMF 18A.1 – Westminster Bridge Upstream	Open Space Riverine Governmental Commercial Residential	Palace of Westminster, Westminster Abbey and St Margaret's Church World Heritage Site South Wing at St Thomas' Hospital Excluding post-1926 Courtyard Infill Buildings (grade II) Victoria Tower Gardens (grade II RPG) Houses of Parliament and the Palace of Westminster (grade I) Millbank Tower (grade II) Westminster Abbey and Parliament Square Conservation Area	Pedestrians Road Users	AVR1 (Wireline)	Elizabeth Tower no longer under scaffolding, cumulative changes to the rear of the view.	Yes	To pick up changes to the cumulative scenario. Whilst scaffolding around Elizabeth House has been removed since the 2018 assessment was undertaken, the original assessment was undertaken on the assumption that the works in question would eventually be completed. with the Visual Amenity Value assigned as 'Very High' accordingly. The baseline condition would remain as per the 2018 assessment.
3	LVMF 22A.3 – Albert Embankment opposite Palace of Westminster	Open Space Riverine Governmental Commercial	Palace of Westminster, Westminster Abbey and St Margaret's Church World Heritage Site Victoria Tower Gardens (grade II RPG) Houses of Parliament and the Palace of Westminster (grade I) Westminster Abbey and Parliament Square Conservation Area	Pedestrians Visitors to the area	AVR1 (Wireline)	Elizabeth Tower no longer under scaffolding, cumulative changes to the rear of the view.	Yes	To pick up changes to the cumulative scenario. Whilst scaffolding around Elizabeth House has been removed since the 2018 assessment was undertaken, the original assessment was undertaken on the assumption that the works in question would eventually be completed. with the Visual Amenity Value assigned as 'Very High' accordingly. The baseline condition would remain as per the 2018 assessment.
4	LVMF 22A.2 – Albert Embankment opposite the Palace of Westminster	Open Space Riverine Governmental Commercial	Palace of Westminster, Westminster Abbey and St Margaret's Church World Heritage Site Victoria Tower Gardens (grade II RPG) Houses of Parliament and the Palace of Westminster (grade I) Millbank Tower (grade II) Westminster Abbey and Parliament Square Conservation Area	Pedestrians Visitors to the area	AVR1 (Wireline)	Elizabeth Tower no longer under scaffolding, cumulative changes to the rear of the view.	Yes	To pick up changes to the cumulative scenario. Whilst scaffolding around Elizabeth House has been removed since the 2018 assessment was undertaken, the original assessment was undertaken on the assumption that the works in question would eventually be completed. with the Visual Amenity Value assigned as 'Very High' accordingly. The baseline condition would remain as per the 2018 assessment.
5	River Thames	Open Space Riverine Governmental Commercial	Palace of Westminster, Westminster Abbey and St Margaret's Church World Heritage Site Victoria Tower Gardens (grade II RPG) Houses of Parliament and the Palace of Westminster (grade I) Millbank Tower (grade II) Westminster Abbey and Parliament Square Conservation Area	Pedestrians	AVR3 (Render)	Elizabeth Tower no longer under scaffolding, cumulative changes to the rear of the view.	Yes	To pick up changes to the cumulative scenario. Whilst scaffolding around Elizabeth House has been removed since the 2018 assessment was undertaken, the original assessment was undertaken on the assumption that the works in question would eventually be completed. with the Visual Amenity Value assigned as 'Very High' accordingly. The baseline condition would remain as per the 2018 assessment.

NUMBER	LOCATION	TOWNSCAPE CHARACTER	HERITAGE ASSETS	VISUAL RECEPTORS	AVR TYPE	CHANGES	VIEW RESHOT IN 2025?	RATIONALE
6	LVMF 22A.1 – Albert Embankment opposite the Palace of Westminster	Open Space Riverine Governmental Commercial	Palace of Westminster, Westminster Abbey and St Margaret's Church World Heritage Site Victoria Tower Gardens (grade II RPG) Houses of Parliament and the Palace of Westminster (grade I) Millbank Tower (grade II) Lambeth Bridge (grade II) Westminster Abbey and Parliament Square Conservation Area	Pedestrians Visitors to the area	AVR3 (Render)	Elizabeth Tower no longer under scaffolding, cumulative changes to the rear of the view.	Yes	To pick up changes to the cumulative scenario. Whilst scaffolding around Elizabeth House has been removed since the 2018 assessment was undertaken, the original assessment was undertaken on the assumption that the works in question would eventually be completed. with the Visual Amenity Value assigned as 'Very High' accordingly. The baseline condition would remain as per the 2018 assessment.
7	LVMF 19A.2 – Lambeth Bridge downstream	Open Space Riverine Governmental Commercial	Palace of Westminster, Westminster Abbey and St Margaret's Church World Heritage Site Victoria Tower Gardens (grade II RPG) Lambeth Bridge (grade II) Westminster Bridge (grade II*) Westminster Abbey and Parliament Square Conservation Area Albert Embankment Conservation Area	Pedestrians Road users Visitors to the area	AVR3 (Render)	Elizabeth Tower no longer under scaffolding.	No	Whilst scaffolding around Elizabeth House has been removed since the 2018 assessment was undertaken, the original assessment was undertaken on the assumption that the works in question would eventually be completed. with the Visual Amenity Value assigned as 'Very High' accordingly. The baseline condition would remain as per the 2018 assessment.
8	LVMF 19A.1 – Lambeth Bridge downstream	Open Space Riverine Governmental Commercial	Palace of Westminster, Westminster Abbey and St Margaret's Church World Heritage Site Victoria Tower Gardens (grade II RPG) Lambeth Bridge (grade II) Westminster Bridge (grade II*) Westminster Abbey and Parliament Square Conservation Area Albert Embankment Conservation Area	Pedestrians Road users Visitors to the area	AVR3 (Render)	Elizabeth Tower no longer under scaffolding.	No	Whilst scaffolding around Elizabeth House has been removed since the 2018 assessment was undertaken, the original assessment was undertaken on the assumption that the works in question would eventually be completed, with the Visual Amenity Value assigned as 'Very High' accordingly. The baseline condition would remain as per the 2018 assessment.
9	TC4	Open Space Riverine Governmental Commercial	Palace of Westminster, Westminster Abbey and St Margaret's Church World Heritage Site Victoria Tower Gardens (grade II RPG) Westminster Abbey and Parliament Square Conservation Area	Pedestrians Users of amenity space	AVR1 (Wireline)		No	No material changes have occurred within this view since the 2018 assessment was undertaken.
10	MI5	Open Space Riverine Governmental Commercial	Palace of Westminster, Westminster Abbey and St Margaret's Church World Heritage Site Victoria Tower Gardens (grade II RPG) Lambeth Bridge (grade II) Westminster Abbey and Parliament Square Conservation Area	Pedestrians Road users	AVR1 (Wireline)	Changes to the streetscape, roundabout removed.	No	Although minor changes have been made in the time since the 2018 assessment, with changes to the streetscape and the removal of the roundabout, the baseline value of this view remains as low-medium. There are no changes to the cumulative scenario.
11	Millbank towards North	Commercial Government Open Space	Palace of Westminster, Westminster Abbey and St Margaret's Church World Heritage Site Victoria Tower Gardens (grade II RPG) Buxton Memorial Fountain (grade II*) Westminster Abbey and Parliament Square Conservation Area	Pedestrians Road users	AVR3 (Render)	Changes to the vegetation.	No	Whilst there have been minor changes to vegetation since the 2018 assessment, the baseline value of the view remains the same. There are no changes to the cumulative scenario.

NUMBER	LOCATION	TOWNSCAPE CHARACTER	HERITAGE ASSETS	VISUAL RECEPTORS	AVR TYPE	CHANGES	VIEW RESHOT IN 2025?	RATIONALE
12	Horseferry Road	Open Space Major traffic route	Palace of Westminster, Westminster Abbey and St Margaret's Church World Heritage Site Victoria Tower Gardens (grade II RPG) Buxton Memorial Fountain (grade II*) Westminster Abbey and Parliament Square Conservation Area	Pedestrians Road users	AVR3 (Render)	Changes to pavement and street	No	Minor changes have been made to the pavement and street configuration since the original assessment was undertaken, however the focus of pedestrians and road users within this view continues to be on wayfinding and the busy carriageway. The baseline value of the view remains the same. There are no changes to the cumulative scenario.
13	Dean Stanley Street	Open Space Major traffic route	Victoria Tower Gardens (grade II RPG) Buxton Memorial Fountain (grade II*) Westminster Abbey and Parliament Square Conservation Area	Pedestrians Road users	AVR3 (Render)	Buxton Memorial covered	No	Whilst the Buxton Memorial is currently under scaffolding, the works in question will simply refurbish the memorial and will not alter its appearance or design. the baseline value of the view remains the same. There are no changes to the cumulative scenario.
14	Great Peter Street	Open Space Major traffic route	Victoria Tower Gardens (grade II RPG) Buxton Memorial Fountain (grade II*) Westminster Abbey and Parliament Square Conservation Area	Pedestrians Road users	AVR3 (Render)	Buxton Memorial covered	No	Whilst the Buxton Memorial is currently under scaffolding, the works in question will simply refurbish the memorial and will not alter its appearance or design. The baseline value of the view remains the same. There are no changes to the cumulative scenario.
15	Great College Street	Open Space Major traffic route	Westminster Abbey and Parliament Square Conservation Area Buxton Memorial Fountain (grade II*) Victoria Tower Gardens (grade II RPG)	Pedestrians Road users	AVR3 (Render)	Buxton Memorial covered	No	Whilst the Buxton Memorial is currently under scaffolding, the works in question will simply refurbish the memorial and will not alter its appearance or design. The baseline value of the view remains the same. There are no changes to the cumulative scenario.
16	TC6A	Open Space Riverine Commercial Governmental	Victoria Tower Gardens (grade II RPG) Rodin's Burghers of Calais (grade I) Westminster Abbey and Parliament Square Conservation Area	Pedestrians Users of amenity space	AVR3 (Render)	Buxton Memorial covered	Yes	To pick up changes to the character and enclosure of Victoria Tower Gardens, including the scaffolding around the Buxton Memorial.
17	TC3B	Open Space Riverine Commercial Governmental	Buxton Memorial Fountain (grade II*) Westminster Abbey and Parliament Square Conservation Area Victoria Tower Gardens (grade II RPG)	Pedestrians Users of amenity space	AVR3 (Render)	Buxton Memorial Covered, construction visible at 4 Dean Stanley Street	No	Whilst the Buxton Memorial is currently under scaffolding, the works in question will simply refurbish the memorial and will not alter its appearance or design. The baseline value of the view remains the same. There are no changes to the cumulative scenario.
18	TC3A	Commercial Open Space Major traffic route Residential	Westminster Abbey and Parliament Square Conservation Area Buxton Memorial Fountain (grade II* RPG) Victoria Tower Gardens (grade II)	Pedestrians Users of amenity space	AVR1 (Wireline)	Construction visible at 4 Dean Stanley Street	Yes	To pick up changes to the character and enclosure of Victoria Tower Gardens, including the scaffolding around the Buxton Memorial.
19	Victoria Tower Gardens	Open Space Commercial	Westminster Abbey and Parliament Square Conservation Area Victoria Tower Gardens (grade II RPG) Lambeth Bridge (grade II) Spicer Memorial (non-designated heritage asset)	Pedestrians Users of amenity space	AVR3 (Render)		No	No material changes have occurred within this view since the 2018 assessment was undertaken.
20	TC6D	Open Space Commercial	Westminster Abbey and Parliament Square Conservation Area Buxton Memorial Fountain (grade II*) Lambeth Bridge (grade II) Victoria Tower Gardens (grade II RPG)	Pedestrians Users of amenity space	AV3 (Render)	Buxton Memorial covered	No	Whilst the Buxton Memorial is currently under scaffolding, the works in question will simply refurbish the memorial and will not alter its appearance or design. The baseline value of the view remains the same. There are no changes to the cumulative scenario.

NUMBER	LOCATION	TOWNSCAPE CHARACTER	HERITAGE ASSETS	VISUAL RECEPTORS	AVR TYPE	CHANGES	VIEW RESHOT IN 2025?	RATIONALE
21	TC6C	Open Space Commercial	Westminster Abbey and Parliament Square Conservation Area Victoria Tower Gardens (grade II RPG) Buxton Memorial Fountain (grade II*) Lambeth Bridge (grade II)	Pedestrians Users of amenity space	AVR3 (Render)	Buxton Memorial covered	Yes	To pick up changes to the character and enclosure of Victoria Tower Gardens, including the scaffolding around the Buxton Memorial.
22	Victoria Tower Gardens	Open Space Commercial Governmental Riverine	Palace of Westminster, Westminster Abbey and St Margaret's Church World Heritage Site Westminster Abbey and Parliament Square Conservation Area Buxton Memorial Fountain (grade II*)	Pedestrians Users of amenity space	AVR3 (Render)	Buxton Memorial covered, Elizabeth Tower no longer under scaffolding	Yes	To pick up changes to the character and enclosure of Victoria Tower Gardens, including the scaffolding around the Buxton Memorial.
23	South of Victoria Tower Gardens	Open Space Commercial Governmental Riverine	Palace of Westminster, Westminster Abbey and St Margaret's Church World Heritage Site Westminster Abbey and Parliament Square Conservation Area Buxton Memorial Fountain (grade II*)	Pedestrians Users of amenity space	AVR3 (Render)	Buxton Memorial covered, Elizabeth Tower no longer under scaffolding, construction visible at 4 Dean Stanley Street	Yes	To pick up changes to the character and enclosure of Victoria Tower Gardens, including the scaffolding around the Buxton Memorial.

Table 5.2 Summary of the heritage and townscape considerations for each view

SUMMARY OF KEY EFFECTS

5.11 Owing to the limited scope of the modifications to the Proposed Development, we do not anticipate any change to the effects identified at Volume 3 of the ES (2018) and the Addendum (2019) in either the Construction or Operational Phases.

5.12 The extensive visualisation analysis, including views of the Proposed Development at night, demonstrates that the medium to distant visual impacts are limited in nature and are either minor in their effect, or negligible. This results from the limited magnitude of change.

5.13 Due to the limited visibility towards the proposed memorial, we conclude that the visual amenity of people experiencing LVMF views towards the World Heritage Site would be preserved.

5.14 In assessing the visual impact of the proposals we have had regard to the high architectural quality of the development. This is on the basis of the well-established principle that there is a material difference in impact between something that is well or poorly designed. That approach does not, we must emphasise, mean that any visual impact is acceptable if the new structure in it is of outstanding quality. Certain forms of development in certain sensitive contexts would be more likely than not to give rise to some harm.

5.15 The memorial has been conceived of as a powerful statement reflecting the enormity of the event in human history. It is necessarily expressive. From the north, the form has a lyrical character, reminiscent of the romantic tradition of designed landscapes, and its arresting form is revealed gradually as the visitor moves towards the entrance at the south.

5.16 That contrast is part of the design concept, and in assessing the proposals, it would be wrong not to have regard to the whole aesthetic experience, and the refined nature of the fins form sinuous elements which add to the quality of the landscape.

5.17 Nevertheless, aesthetically, there are adverse visual impacts upon the contained space at the south of the gardens, and its close position relative to the entrance pavilion. These need to be set in the context of the whole, as part of a sequence of views experienced by the visitor.

5.18 New views from the elevated area of landscaping would create a destination from which to appreciate the Houses of Parliament and Westminster WHS from the south, and the location of a memorial close to the Houses of Parliament is an established and entirely appropriate form of development within Victoria Tower Gardens.

5.19 **Table 5.3** below summarises our conclusions regarding the visual effects of the Proposed Development.

5.20 For the avoidance of doubt, none of the cumulative schemes identified within a 1km radius of the Site would materially alter the visual effects assessed for the Proposed Development on heritage, townscape, and visual receptors.

VIEW	LOCATION	VISUAL AMENITY VALUE	VISUAL RECEPTORS	SUSCEPTIBILITY TO CHANGE	SENSITIVITY	MAGNITUDE OF IMPACT (SITE PREPARATION AND CONSTRUCTION)	LIKELY EFFECT (SITE PREPARATION AND CONSTRUCTION)	MAGNITUDE OF IMPACT (OPERATION)	LIKELY EFFECT (OPERATION) 2018	LIKELY EFFECT (CUMULATIVE) 2018	LIKELY EFFECT (OPERATION) 2019	LIKELY EFFECT (CUMULATIVE) 2019	LIKELY EFFECT (OPERATION) 2025	LIKELY EFFECT (CUMULATIVE) 2025
1	LVMF 18A.2 – Westminster Bridge Upstream	Very High	Pedestrians	Medium	High	Negligible	Temporary Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible
			Road Users	Low	Moderate	Negligible	Temporary Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible
2	LVMF 18A.1 – Westminster Bridge Upstream	Very High	Pedestrians	Medium	High	Negligible	Temporary Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible
			Road Users	Low	Moderate	Negligible	Temporary Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible
3	LVMF 22A.3 – Albert Embankment opposite the Palace of Westminster	Very High	Pedestrians	Medium	High	Negligible	Temporary Negligible	Nil	Nil	Nil	Nil	Nil	Nil	Nil
			Visitors to the area	Medium	High	Negligible	Temporary Negligible	Nil	Nil	Nil	Nil	Nil	Nil	Nil
4	LVMF 22A.2 – Albert Embankment opposite the Palace of Westminster	Very High	Pedestrians	Medium	High	Negligible	Temporary Negligible	Nil	Nil	Nil	Nil	Nil	Nil	Nil
			Visitors to the area	Medium	High	Negligible	Temporary Negligible	Nil	Nil	Nil	Nil	Nil	Nil	Nil
5	River Thames: Summer	High	Pedestrians	Medium	Moderate	Negligible	Temporary Negligible	Nil	Nil	Nil	Nil	Nil	Nil	Nil
	Winter	High	Pedestrians	Medium	Moderate	Negligible	Temporary Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible
6	LVMF 22A.1 – Albert Embankment opposite the Palace of Westminster: Summer	Very High	Pedestrians	Medium	High	Negligible	Temporary Negligible	Nil	Nil	Nil	Nil	Nil	Nil	Nil
			Visitors to the area	Medium	High	Negligible	Temporary Negligible	Nil	Nil	Nil	Nil	Nil	Nil	Nil
	LVMF 22A.1 – Albert Embankment opposite the Palace of Westminster: Winter	Very High	Pedestrians	Medium	High	Negligible	Temporary Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible
			Visitors to the area	Medium	High	Negligible	Temporary Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible
7	LVMF 19A.2 – Lambeth Bridge downstream: Summer	Very High	Pedestrians	Medium	High	Negligible	Temporary Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible
			Road users	Low	Moderate	Negligible	Temporary Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible
			Visitors to the area	Medium	High	Negligible	Temporary Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible
	LVMF19A.2 – Lambeth Bridge downstream: Winter	Very High	Pedestrians	Medium	High	Negligible	Temporary Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible
			Road users	Low	Moderate	Negligible	Temporary Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible
			Visitors to the area	Medium	High	Negligible	Temporary Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible

VIEW	LOCATION	VISUAL AMENITY VALUE	VISUAL RECEPTORS	SUSCEPTIBILITY TO CHANGE	SENSITIVITY	MAGNITUDE OF IMPACT (SITE PREPARATION AND CONSTRUCTION)	LIKELY EFFECT (SITE PREPARATION AND CONSTRUCTION)	MAGNITUDE OF IMPACT (OPERATION)	LIKELY EFFECT (OPERATION) 2018	LIKELY EFFECT (CUMULATIVE) 2018	LIKELY EFFECT (OPERATION) 2019	LIKELY EFFECT (CUMULATIVE) 2019	LIKELY EFFECT (OPERATION) 2025	LIKELY EFFECT (CUMULATIVE) 2025
8	LVMF 19A.1 – Lambeth Bridge downstream: Summer, Daytime	Very High	Pedestrians	Medium	High	Negligible	Temporary Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible
			Road users	Low	Moderate	Negligible	Temporary Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible
			Visitors to the area	Medium	High	Negligible	Temporary Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible
	LVMF 19A.1 – Lambeth Bridge downstream: Summer, Night Time	Very High	Pedestrians	Medium	High	Negligible	Temporary Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible
			Road users	Low	Moderate	Negligible	Temporary Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible
			Visitors to the area	Medium	High	Negligible	Temporary Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible
	LVMF19A,1 – Lambeth Bridge downstream: Winter, Daytime	Very High	Pedestrians	Medium	High	Negligible	Temporary Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible
			Road Users	Low	Moderate	Negligible	Temporary Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible
			Visitors to the area	Medium	High	Negligible	Temporary Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible
	LVMF 19A.1 – Lambeth Bridge downstream: Winter, Night Time	Very High	Pedestrians	Medium	High	Negligible	Temporary Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible
			Road users	Low	Moderate	Negligible	Temporary Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible
			Visitors to the area	Medium	High	Negligible	Temporary Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible
9	TC4	Low	Pedestrians	Medium	Moderate	Low	Temporary Minor Adverse	Low	Minor Adverse	Minor Adverse	Minor Adverse	Minor Adverse	Minor Adverse	Minor Adverse
			Users of amenity space	Medium	Moderate	Low	Temporary Minor Adverse	Low	Minor Adverse	Minor Adverse	Minor Adverse	Minor Adverse	Minor Adverse	Minor Adverse
10	MI5	Low	Pedestrians	Medium	Moderate	Negligible	Temporary Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible
			Road Users	Low	Low	Negligible	Temporary Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible
11	Millbank towards north	Low	Pedestrians	Medium	Moderate	Low	Temporary Minor Adverse	Low	Minor Adverse	Minor Adverse	Minor Adverse	Minor Adverse	Minor Adverse	Minor Adverse
			Road Users	Low	Low	Low	Temporary Minor Adverse	Low	Minor Adverse	Minor Adverse	Minor Adverse	Minor Adverse	Minor Adverse	Minor Adverse
12	Horseferry Road	Low	Pedestrians	Medium	Moderate	Low	Temporary Minor Adverse	Low	Minor Adverse	Minor Adverse	Minor Adverse	Minor Adverse	Minor Adverse	Minor Adverse
			Road Users	Low	Low	Low	Temporary Minor Adverse	Low	Minor Adverse	Minor Adverse	Minor Adverse	Minor Adverse	Minor Adverse	Minor Adverse
13	Dean Stanley Street	Medium	Pedestrians	Medium	Moderate	Low	Temporary Minor Adverse	Medium	Moderate Adverse	Moderate Adverse	Moderate Adverse	Moderate Adverse	Moderate Adverse	Moderate Adverse
			Road Users	Low	Low	Low	Temporary Minor Adverse	Medium	Moderate Adverse	Moderate Adverse	Moderate Adverse	Moderate Adverse	Moderate Adverse	Moderate Adverse

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14	Great Peter Street	Low	Pedestrians	Medium	Moderate	Negligible	Temporary Negligible	Medium	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial
			Road Users	Low	Low	Negligible	Temporary Negligible	Medium	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial
15	Great College Street	Low	Pedestrians	Medium	Low	Negligible	Temporary Negligible	Medium	Minor Beneficial	Minor Beneficial	Minor Beneficial	Minor Beneficial	Minor Beneficial	Minor Beneficial
			Road users	Low	Low	Negligible	Temporary Negligible	Medium	Minor Beneficial	Minor Beneficial	Minor Beneficial	Minor Beneficial	Minor Beneficial	Minor Beneficial
16	TC6A	Medium	Users of Amenity Space	Medium	Moderate	Low	Temporary Minor Adverse	Medium	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial
			Pedestrians	Low	Moderate	Low	Temporary Minor Adverse	Medium	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial
17	TC3B	Medium	Users of Amenity Space	Medium	Moderate	Low	Temporary Minor Adverse	Medium	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial
			Pedestrians	Low	Moderate	Low	Temporary Minor Adverse	Medium	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial
18	TC3A: Day time	Medium	Users of Amenity Space	Medium	Moderate	Low	Temporary Minor Adverse	Medium	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
			Pedestrians	Low	Moderate	Low	Temporary Minor Adverse	Medium	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
	TC3A: Night Time	Medium	Users of Amenity Space	Medium	Moderate	Low	Temporary Minor Adverse	Medium	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
			Pedestrians	Low	Moderate	Low	Temporary Minor Adverse	Medium	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
19	Victoria Tower Gardens: Daytime	Low	Users of Amenity Space	Medium	Low	Low	Temporary Minor Adverse	Medium	Minor Adverse	Minor Adverse	Minor Adverse	Minor Adverse	Minor Adverse	Minor Adverse
			Pedestrians	Medium	Low	Low	Temporary Minor Adverse	Medium	Minor Adverse	Minor Adverse	Minor Adverse	Minor Adverse	Minor Adverse	Minor Adverse
	Victoria Tower Gardens: Night Time	Low	Users of Amenity Space	Medium	Low	Low	Temporary Minor Adverse	Medium	Minor Adverse	Minor Adverse	Minor Adverse	Minor Adverse	Minor Adverse	Minor Adverse
			Pedestrians	Medium	Low	Low	Temporary Minor Adverse	Medium	Minor Adverse	Minor Adverse	Minor Adverse	Minor Adverse	Minor Adverse	Minor Adverse
20	TC6D	Medium	Users of Amenity Space	Medium	Moderate	Low	Temporary Minor Adverse	Medium	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial
			Pedestrians	Medium	Moderate	Low	Temporary Minor Adverse	Medium	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial

VIEW	LOCATION	VISUAL AMENITY VALUE	VISUAL RECEPTORS	SUSCEPTIBILITY TO CHANGE	SENSITIVITY	MAGNITUDE OF IMPACT (SITE PREPARATION AND CONSTRUCTION)	LIKELY EFFECT (SITE PREPARATION AND CONSTRUCTION)	MAGNITUDE OF IMPACT (OPERATION)	LIKELY EFFECT (OPERATION) 2018	LIKELY EFFECT (CUMULATIVE) 2018	LIKELY EFFECT (OPERATION) 2019	LIKELY EFFECT (CUMULATIVE) 2019	LIKELY EFFECT (OPERATION) 2025	LIKELY EFFECT (CUMULATIVE) 2025
21	TC6C	Medium	Users of Amenity Space	Medium	Moderate	Low	Temporary Minor Adverse	Medium	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial
			Pedestrians	Medium	Moderate	Low	Temporary Minor Adverse	Medium	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial
22	Victoria Tower Gardens: Day Time	High	Users of Amenity Space	Medium	Moderate	Low	Temporary Minor Adverse	High	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial
			Pedestrians	Medium	Moderate	Low	Temporary Minor Adverse	High	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial
	Victoria Tower Gardens: Night Time	High	Users of Amenity Space	Medium	Moderate	Low	Temporary Minor Adverse	High	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial
			Pedestrians	Medium	Moderate	Low	Temporary Minor Adverse	High	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial
23	Southern Extent of Victoria Tower Gardens	Medium	Users of Amenity Space	Medium	Moderate	Low	Temporary Minor Adverse	High	N/A (view added in 2019)	N/A (view added in 2019)	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial
			Pedestrians	Medium	Moderate	Low	Temporary Minor Adverse	High	N/A (view added in 2019)	N/A (view added in 2019)	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial	Moderate Beneficial

Table 5.3 Summary of likely visual effects

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6.0
HOUSE OF LORDS SELECT COMMITTEE OPTIONS APPRAISAL

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HOUSE OF LORDS SELECT COMMITTEE OPTIONS APPRAISAL

6.1 During the passage of the Bill a number of concerns were identified by the House of Lords Select Committee that have been considered.

6.2 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.

6.3 The potential options are set out in the DAS Second Addendum and Environmental Addendum (2026). Below, we consider the potential effect of each option on relevant heritage, townscape and visual receptors. It is concluded that there would be no additional likely significant effects deriving from the implementation of the individual options. However, should multiple options be combined, there might be an 'accumulative' effect which would subsequently need to be considered.

	HERITAGE RECEPTORS AFFECTED	TOWNSCAPE RECEPTORS AFFECTED	VISUAL RECEPTORS AFFECTED	CHANGE TO 2026 HERITAGE CONCLUSIONS	CHANGE TO 2026 TOWNSCAPE CONCLUSIONS	CHANGE TO 2026 VISUAL ASSESSMENT CONCLUSIONS
Option 1A: Hedge Boundary to Playground	Westminster Abbey and Parliament Square Conservation Area Victoria Tower Gardens (Grade II RPG)	TCA 1: Victoria Tower Gardens	Users of amenity space Pedestrians Road users	The hedge boundary to the playground would be consistent with the landscaped character of the RPG and contribution of Victoria Tower Gardens to the character and appearance of the CA. There would be no change to 2026 conclusions regarding heritage effects.	The hedge boundary would be consistent with the use and character of the park. There would be no change to the 2026 conclusions relating to effects on TCA1.	The proposed hedge boundary to the playground would be consistent with the established visual amenity of the park. No change to the 2026 conclusions relating to effects on visual receptors.
Option 1B: Installation of new gate on Millbank, and full Hedge/Railing Boundary	Westminster Abbey and Parliament Square Conservation Area Victoria Tower Gardens (Grade II RPG) Norwest House (Grade II)	TCA 1: Victoria Tower Gardens TCA 10: Smith Square	Users of amenity space Pedestrians Road users	The Proposed option includes alteration to the railings enclosing the RPG, resulting in a loss of fabric. This could potentially create an adverse effect – subject to detailed design. The additional scope of Option 1b would not materially alter our conclusions relating to the impacts on the heritage receptors.	In relation to TCA 1 there would be an improvement to permeability from Millbank (within TCA 10). Within the context of the Proposals as a whole, this would not be sufficient to alter our conclusions relating to TCA 1 or TCA 10.	The proposed hedge boundary to the playground would be consistent with the established visual amenity of the park. No change to the 2026 conclusions relating to effects on visual receptors.
Option 1C: Full Hedge/Railing Boundary	Westminster Abbey and Parliament Square Conservation Area Victoria Tower Gardens (Grade II RPG)	TCA 1: Victoria Tower Gardens	Users of amenity space Pedestrians Road users	The hedge boundary to the playground would be consistent with the landscaped character of the RPG and contribution of Victoria Tower Gardens to the character and appearance of the CA. There would be no change to 2026 conclusions regarding heritage effects.	The proposed hedge boundary would be consistent with the use and character of the park. There would be no change to the 2026 conclusions relating to effects on TCA 1.	The hedge boundary to the playground would be consistent with the established visual amenity of the park. No change to the 2026 conclusions relating to effects on visual receptors.
Option 1D: Removal of Café Kiosk	Westminster Abbey and Parliament Square Conservation Area Victoria Tower Gardens (Grade II RPG)	TCA 1: Victoria Tower Gardens	Users of amenity space Pedestrians Road users	The removal of the café kiosk would be a negligible reduction in massing and footprint of new development. Owing to the limited degree of change in relation to the overall proposals, the additional scope of Option 1D would not materially alter our conclusion relating to the impacts of the heritage receptors.	The café kiosk is a secondary amenity use to the memorial, its loss would not materially alter the townscape effects deriving from the proposed development as a whole. There would be no change to the 2026 conclusions relating to the effects on TCA1.	The removal of the café kiosk would have a minimal change to the visual appearance of the proposals owing to the decrease in massing. The additional scope of Option 1D would not materially alter 2026 conclusions relating to the impacts on visual receptors.
Option 1E: Reorientation of Café Kiosk	Westminster Abbey and Parliament Square Conservation Area Victoria Tower Gardens (Grade II RPG)	TCA 1: Victoria Tower Gardens TCA 4: The River Thames	Users of amenity space Pedestrians Road users	Owing to the limited degree of change, there is no change to the impact on the nearby heritage receptors as a result of these modifications. There would be no change to 2026 conclusions regarding heritage effects.	The reorientation of the kiosk would introduce a direct interface between the TCA 1 and TCA 4; however, the kiosk would remain set back from the Thames Path, and the additional scope. There would be no material change to the character and appearance of the CA. Within the context of the Proposals as a whole, this would not be sufficient to alter our conclusions relating to TCA 1 or TCA 4.	The reorientation of the Café kiosk would be a minimal visual change. Users of the amenity spaces, particularly the Thames Path, may have an increased awareness of the activity of the kiosk, however this would be minimal. The additional scope of Option 1E would not materially alter 2026 conclusions relating to the impacts on visual receptors.
Option 1F: Buxton Memorial Widened Path	Westminster Abbey and Parliament Square Conservation Area Victoria Tower Gardens (Grade II RPG) Buxton Memorial Fountain (Grade II	TCA 1: Victoria Tower Gardens	Users of amenity space Pedestrians Road users	There would be no material change to the character and appearance of the CA. The widened path would be consistent with the landscaped character of the RPG. May deliver a modest beneficial effect to the setting of the Grade II-listed Buxton Memorial, but not sufficient to alter the overall effect of the Proposed Development. There would be no change to 2026 conclusions regarding heritage effects.	The proposed hedge boundary would be consistent with the use and character of the park. There would be no change to the 2026 conclusions regarding effects on TCA 1.	The widened path would result in a negligible change to visual amenity. There would be no change to the 2026 conclusions regarding effects on visual receptors.

Table 6.1 Summary of heritage, townscape, and visual impacts for each design option

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7.0
CONCLUSION

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CONCLUSION

7.1 Overall, we find that the proposed modifications to the scheme do not change our overarching assessment of effects to heritage, townscape and visual receptors as set out in our original analysis in Volume 3 of the ES and the 2019 addendum.

7.2 The high-quality design of the Proposed Development will enhance the visual character of the park, introducing new points of interest and encouraging increased visitor engagement. It will offer opportunities for reflection on both the new memorial and the existing Buxton Memorial within Victoria Tower Gardens. The proposed landscape improvements across the site will also enhance accessibility and overall enjoyment of the space.

7.3 The new memorial is expected to attract additional visitors to Victoria Tower Gardens, allowing more people to engage with both the existing memorials and the park. The proposals also introduce new sightlines towards the Palace of Westminster from the landscaped slope above the memorial, reinforcing the visual and contextual relationship between the park and the World Heritage Site.

7.4 We have found that the ability to appreciate the reasons for the park's designation would remain, and its open character would not change.

7.5 Therefore, we find that any harm to the park arising from the change in the character of the land during the construction phase at the Site would be at the lower end of less than substantial in the terms of the NPPF. Any harm caused to the character of the park by the construction of the memorial would be limited, and would have to be balanced against the heritage benefits outlined above.

7.6 The full list of public benefits are set out in the Planning Statement by DP9, and should be read in conjunction with this report.

APPENDIX 1: HTVIA METHODOLOGY (DECEMBER 2018)

UNITED KINGDOM HOLOCAUST MEMORIAL AND LEARNING CENTRE

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Methodology

2.0 METHODOLOGY

2.1 The following section explains the methodologies employed for both assessment of baseline conditions and the effect of the Proposed Development during both installation and operation on heritage, townscape and visual receptors. The term 'receptor' is used in this assessment to mean an element or assemblage of elements that could be affected by the Proposed Development.

2.2 The method is the product of legislation, policy and best practice guidance as set out in **Section 2**. Different methodologies apply to each area of assessment. We discuss each of these, in turn, below, following an overview of the general assessment framework.

2.3 The assessment has been informed by the ICOMOS 'Guidance on Heritage Impact Assessments for Cultural World Heritage Properties' (2011), which is relevant to evaluating the impact of the Proposed Development on the OUV of the Westminster World Heritage Site. In accordance with the guidance the assessment incorporates comprehensive understanding of the WHS and its OUV, and of the impacts arising from the Proposed Development.

Study Area

2.4 Site observations, a manual desk-based review of OS maps, characterisation studies and relevant heritage receptors were used to determine the study area. The study area has been informed by building locations and heights, topography and townscape features, and an understanding of the scale of the Proposed Development. The study area incorporates:

- All built heritage receptors within 500m of the Application Site, including World Heritage Sites, listed buildings, conservation areas, registered parks and gardens and locally listed buildings;
- A townscape study area to include the townscape within 500m of the Application Site;
- A visual effect study area determined by the visual envelope of the Application Site, identified following an appraisal of the Site, a review of 3d modelling of the proposals within the existing townscape and the agreement of viewpoint locations with the City of Westminster and Historic England through pre-application consultation.

2.5 A Candidate View Study of the Proposed Development from over 40 viewpoints was prepared by Hayes Davidson as part of the assessment to determine the scope for the Proposed Development to be visible within the study area.

2.6 The Candidate View Study illustrated the potential (or theoretical) visibility of the Proposed Development within the study area. It showed that the visibility of the Proposed Development would markedly decrease outside of a c.500m radius around the Site and that potential views of the Proposed Development would largely be screened by interposing development and trees, including those around the boundary of Victoria Tower Gardens.

2.7 In addition, a number of the Views in **Section 9** demonstrate how screening by local variables such as trees and soft landscaping further reduces the scope for the Proposed Development to be visible within the study area.

2.8 The Candidate View Study, site surveys and accurate visual representations supported the appropriateness of applying a 500m study area for heritage, townscape and visual receptors and enabled heritage receptors to be scoped out of further assessment as it confirmed that the Proposed Development would not be discernible.

2.9 The study area and method for its identification is considered to be reasonable and proportionate to the scale, nature and context of the Proposed Development, and is considered sufficient to understand the likely significant effects.

2.10 Whilst every Environmental Statement should provide a full factual description of the development, the emphasis of Schedule 4 of the EIA Regulations is on the "main" or "significant" environmental effects to which a development is likely to give rise. The Environmental Statement should be proportionate and not be any longer than is necessary to properly assess those effects.

Site Visits

2.11 Site surveys of the baseline situation was undertaken by Montagu Evans during several site visits in 2018 to understand the immediate setting of the Application Site, the setting of the surrounding heritage receptors, the townscape character and appearance, and key viewpoints.

Assessment Process Framework

2.12 Different methodologies apply to each area of assessment. The overarching assessment framework for all topics follows a three step process. We discuss each of the constituent parts of the three steps below.

- Baseline Assessment of Value;
- Assessment of Sensitivity and Magnitude; and
- Likely Significant Effects including mitigation, residual effects and cumulative effects.

Baseline Assessment of Value

Heritage

2.13 The term 'heritage receptor' is used within this assessment to describe a designated (e.g. World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area) or non-designated (identified by the local authority e.g. locally listed building) heritage asset. For the purposes of this Volume of the ES, built heritage receptors do not include archaeological remains.

2.14 Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (2015) sets out a framework of four inter-related key values for assessing the value of historic buildings and places. The NPPF defines the significance of a heritage asset as the sum of its archaeological, architectural, historic, and artistic interest. Significance derives not only from a heritage asset's physical presence, but also from its setting.

2.15 To aid with clear communication and avoid confusion with the term "significance" as used in the conventional EIA sense, we refer to heritage significance as 'heritage value'.

2.16 Value is assessed against the criteria contained in **Table 2.1**. The assessment of heritage value is graded Exceptional to Very Low. It is commonly agreed that World Heritage Sites and Grade I buildings are of "exceptional" and "particularly important" interest; therefore these are generally afforded a higher heritage value. This differentiation is best summarised by the drafting of paragraph 189 of the NPPF, which states that the:

> *"level of detail (to describe the significance of heritage assets) should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance."*

2.17 Thus, a grading is appropriate. Non-designated heritage receptors are recognised as having local value. Due and proportionate regard has been given to all heritage receptors identified.

Heritage Receptor Value		
Value	Criteria	Examples
Exceptional	Building/site/area of international value.	Likely to be World Heritage Sites, Areas of Outstanding Natural Beauty and National Parks. Often listed Buildings Grade I and II* and their settings, Scheduled Monuments with upstanding remains, registered Historic Parks and Gardens Grade I and II* and their settings.
High	Building/site/area of national value.	May be Listed Buildings Grade I and II* and their settings, Scheduled Monuments with upstanding remains, registered Historic Parks and Gardens Grade I and II* and their settings.
Medium	Building/site/area of national value.	Often Listed Buildings Grade II and their settings, Conservation Areas and their settings, Scheduled Monuments without upstanding remains, and registered Historic Parks and Gardens Grade II and their settings.
Low	Buildings/sites/areas of national and/or regional value, or local assets of particular significance.	May be Listed Buildings Grade II and their settings, Conservation Areas and their settings, Scheduled Monuments without upstanding remains, registered Historic Parks and Gardens Grade II and their settings, and buildings of local interest.
Very Low	Buildings/sites/areas with some evidence of value but in an incoherent or eroded form of local interest and generally with no statutory protection.	Often buildings of local interest and dispersed elements of townscape merit. Assets may be so badly damaged that too little remains to justify inclusion into a higher grade.

Table 2.1 Heritage Receptor Value Criteria

2.18 Where a proposal may affect the surroundings in which the receptor is experienced, a qualitative assessment is made of whether, how and to what degree setting contributes to the heritage value of heritage assets. This is informed by the check-list of potential attributes of a setting, as outlined by Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2017).

2.19 Setting is defined in the NPPF as,

> *"the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral".*

2.20 In this assessment, the Baseline section combines GPA3's steps 1 (identifying heritage assets likely to be affected by development) and 2 (identifying the contribution made by their settings to their significance) into a single baseline section. Within the baseline section, the staged process is followed for each individual asset or group of assets. In the assessment section, the methodology then proceeds to GPA3 step 3, assessing the likely effects of the Proposed Development on the identified baseline.

Townscape

2.21 The framework for assessment of townscape and visual receptors has been prepared using GLVIA. We have also had regard to the methodology set out in An Approach to Landscape Character Assessment (2014) prepared by Natural England.

2.22 Townscape is the "built-up area, including the buildings, the relationships between them, the different types of urban open spaces, including green spaces, and the relationship between buildings and open spaces", as defined in GLVIA3.

2.23 An initial assessment defined distinct and recognisable patterns of elements, or characteristics that make one area different from another, rather than better or worse. This process, defined as townscape character assessment, is the process of identifying and describing variation in the character of townscape.

2.24 The assessment was informed by both field survey and desk based research of secondary sources, with reference to existing conservation area character assessments, where applicable. The assessment allowed the description of character areas/types, their key characteristics and for them to be mapped with boundaries. The mapped boundaries suggest a sharp change from one townscape area to another. On site, however, this often represents a zone of transition. Townscape character areas are identified and assessed according to townscape receptor value (in relation to their built form, materials, maintenance, and statutory and non-statutory designations), using criteria contained in **Table 2.2**.

2.25 The objective of identifying the existing context is to provide an understanding of the townscape in the area that may be affected – its constituent elements, its character and the way this varies spatially, its geographic extent, its history, its condition, the way the townscape is experienced and the value attached to it.

Townscape Receptor Value		
Value	Criteria	Examples/Features
Exceptional	Very attractive, unique or outstanding townscape with clearly distinctive characteristics, features and elements; Widespread use of quality materials; Very strong urban structure, characteristic patterns and balanced combination of built form and open space; Good condition - appropriate management for land use; Unique sense of place; No detracting features.	Internationally or Nationally recognised World Heritage Site, Archaeological Important Area, Scheduled Ancient Monuments, sites of national importance recorded on the Sites and Monument Record (SMR) or National Monuments Record (NMR), Grade I and II* Listed Buildings and Grade I and II* Listed Parks and Gardens.
High	Very attractive townscape with distinctive or unusual features and elements; Evident use of quality materials; Strong urban structure, characteristic patterns and balanced combination of built form and open space; Appropriate management for land use with limited scope to improve; Strong sense of place; Occasional detracting features.	Nationally, Regionally or District recognised Archaeological Important Areas, Scheduled Ancient Monuments, Grade II Listed Buildings, Grade II Listed Parks and Gardens, Tree Preservation Orders and sites of national, regional or county importance recorded on the SMR or NMR.
Medium	Attractive townscape with some distinctive features; Recognisable urban structure, characteristic patterns and combinations of built form and open space; Scope to improve management for land use; Some features worthy of conservation; Sense of place; Some detracting features.	Regional, District or Local recognised. Generally undesignated but value expressed through literature and cultural associations or through local plan designations, conservation areas and demonstrable use. May contain Listed Buildings, Tree Preservation Orders and sites of county or local importance.
Low	Typical, commonplace and unremarkable townscape with limited variety or distinctiveness; Distinguishable and urban structure, characteristic patterns and combinations of built form and open space; Scope to improve management for land use; Some features worthy of conservation; Some dominant detracting features.	District or Locally recognised Certain individual townscape elements or features may be worthy of conservation and townscape either identified for or would benefit from regeneration, restoration or enhancement. Site or area may be valued at a community level.
Very Low	Townscape often in decline; Weak or degraded urban structure, characteristic patterns and combination of built form and open space; Lack of management has resulted in degradation; Frequent dominant detracting features; Disturbed or derelict land requires treatment.	Not formally recognised.

Table 2.2 Townscape Receptor Value Criteria

Visual

2.26 The framework for assessment of visual receptors has been prepared using GLVIA3.

2.27 The aim of the visual baseline is to establish the area in which the Proposed Development may be visible, the different groups of people who may experience views of the Proposed Development, the places where they will be affected and the nature of the views and visual amenity at those points.

2.28 The baseline study identifies individuals and/or defined groups of people within the area who will be affected by changes in the views, 'visual receptors'. The following visual receptors are identified by GLVIA3 as being likely to be the most susceptible to change:

- Residents at home;
- People, whether residents or visitors, who are engaged in outdoor recreation, including use of public rights of way, whose attention or interest is likely to be focused on the landscape and on particular views;
- Visitors to heritage assets, or to other attractions, where views of the surroundings are an important contributor to the experience; and
- Communities where views contribute to the landscape setting enjoyed by residents in the area.

2.29 Assessment viewpoints were identified based on a comprehensive review of the surrounding area, including the following criteria:

- Heritage receptors;
- Townscape character;
- Where the Proposed Development may be conspicuous;
- Be visible from concentrations of residential areas;
- Open spaces (parkland, publicly accessible space);
- Potentially sensitive receptors (e.g. schools);
- Accessibility to the public;
- The viewing direction, distance and elevation; and/or
- Townscape and transport nodes.

2.30 The Application Site is located adjacent to the river, and the Proposed Development therefore has the potential to be visible within some River Prospect and Townscape strategic views as determined by the adopted London View Management Framework (LVMF) (2012). The Proposed Illumination has the potential to be visible within some locally designated views including those identified in the Lambeth Local Plan (2015) and Westminster City Plan (2016), as well as relevant Conservation Area Appraisals. The assessment viewpoints have been determined in order to assess the potential impact of the Proposed Development in the relevant strategic and local views.

2.31 The distance of the viewpoints from the Application Sites represents the 'visual study area'. The study area may be defined as the anticipated extent of visibility (from a height of approximately 1.5m (eye level) above the ground). It is acknowledged and accepted that judgments made by a surveyor are subjective, which provides limitations to the identification of a visual envelope.

2.32 There will be areas within the study area where visibility is not possible e.g. due to interposing development. Conversely, the assessment considers further long distance views where identified and relevant. Mindful of the assessment objective to understand likely significant effects to heritage, townscape and visual receptors, we consider this a reasonable approach which is proportional to the scale and nature of the Proposed Development.

2.33 The visual assessment is supported by Accurate Visual Representations (AVRs), which provide the basis for the assessment of the Proposed Development and its effect on the agreed key views. It is important to note, however, that AVRs, even the most 'realistically' rendered, have limitations. They are 2-D representations from a fixed point of scenes which are perceived as one moves around.

2.34 Critically, the AVRs lack depth cues and are rendered in clear lighting conditions at times of greatest visibility (generally). Neither do the the transient significant effects arising from noise or traffic on perception, or that wider range of expectations and associations that anyone in an urban scene may have.

2.35 The text accompanying each view seeks to contextualise it. Inevitably one must accept that judgement is involved in this specialist area on the basis of the above and the importance of design quality in the operation of policy. In preparing any written assessment, allowances are made for these factors as well as the assessor's knowledge of the Proposed Development.

2.36 The views are identified and assessed according to visual receptor value, using the criteria contained in **Table 2.3**. The assessment of visual value is graded exceptional to very low.

Visual Receptor Value	
Value	Criteria / Examples
Exceptional	Identified strategic views, into and out of World Heritage Sites, and / or views of national and international importance.
High	Statutory development plan identified views and/or views of national or regional importance, or particular local importance. May comprise public open spaces where focus is on views/public rights of way through highly valued townscape, regional routes, immediate setting of elements of national cultural heritage value that are not compromised.
Medium	Supplementary planning documents identified views including conservation area appraisals, and/or views of regional or local importance. May comprise public rights of way through townscapes of moderate value, setting for elements of local and/or regional cultural heritage value or national value whose settings are already compromised.
Low	Observer within area of ordinary townscape value, or good townscape value where significant elements detract.
Very Low	Observer within area of very low townscape quality (e.g. industrial areas/busy main roads) that has very few positive characteristics.

Table 2.3 Visual Receptor Value Criteria

Assessment of Sensitivity and Magnitude

2.37 Following the identification of baseline conditions, the effect of the Proposed Development on each of the identified receptors is then considered and a judgement formed as to the duration, extent and magnitude of impact.

2.38 Scoping and the baseline assessment may conclude that some effects on receptors are unlikely to be significant and therefore do not need to be considered further. Where applicable, these receptors are identified within the relevant assessment sections of this Volume of the ES.

2.39 In order to identify the sensitivity of a receptor to the Proposed Development the baseline value must be calibrated by the susceptibility to change using the criteria contained in **Table 2.4**. Susceptibility is the ability of the receptor to accommodate proposals without undue consequences for the maintenance of the baseline situation and/or the achievement of planning policies and strategies. For heritage receptors, susceptibility also considers the setting of the receptor in conjunction with its value and the particular nature of the proposals.

2.40 This is an assessment bespoke to the Proposed Development that considers the specific nature of the proposals in relation to the value of the receptor. It is a qualitative judgement recorded in a verbal scale (e.g. high, medium or low), although supported by a clear narrative linked to evidence from the baseline study.

2.41 **Table 2.5** provides an indicative matrix to identify sensitivity, based on combining receptor value and susceptibility to change.

2.42 A professional judgement is made of the magnitude of likely impact using criteria at **Table 2.6**. Magnitude of impact is determined by the size or scale, geographical extent or duration and reversibility of the effect. Magnitude considers whether the Proposed Development:

- Conforms with the historic and architectural features of the receptor;
- Creates a loss or restoration of key features of the receptor;
- Contributes to the character and/or appearance of the identified receptor; and
- Accords with national, regional and local planning policy and guidelines.

Susceptibility to Change Criteria	
Low	The receptor has a high ability to accommodate the specific proposed change, and/or The receptor's existing setting may make a negative contribution to the heritage value of the asset, and/or Distance, topography and/or intervening may block any visual relationship with the proposed change.
Medium	The receptor has a medium ability to accommodate the specific proposed change, and/or The receptors' existing setting may make a neutral contribution to the value of the asset, and/or Distance, topography and/or intervening development may block or allow a visual relationship with the proposed change.
High	The receptor has a low ability to accommodate the specific proposed change, and/or The receptor's existing setting makes a positive contribution to the heritage value of the asset, and/or Distance, topography and/or intervening development may allow a visual relationship with the proposed change.

Table 2.4 Susceptibility of Receptor to Change Criteria

Nature of Receptor Likely to be Affected (Sensitivity)			
Receptor Value	Susceptibility of Receptor to Change		
	Low	Medium	High
Very Low	Low	Low	Low / Moderate
Low	Low	Low / Moderate	Moderate
Medium	Low / Moderate	Moderate	Moderate / High
High	Moderate	Moderate / High	High
Exceptional	Moderate / High	High	High

Table 2.5 Nature of Receptor Likely to be Affected (Sensitivity)

Nature of the impact likely to occur to receptor (Magnitude)	
High	Considerable change to the value of the receptor. The proposals are a new component, ranging from a notable change in receptor characteristics over an extensive area to intensive change over a more limited area. The proposals would be very noticeable. Loss of or major alteration to key elements / features / characteristics of the baseline. The duration of this effect may be permanent and non-reversible.
Medium	A clearly discernible change to the value of the receptor. The proposals are dissimilar to a main component of the receptor but similar to other components. The proposals would be readily noticeable. Partial loss of or alteration to one or more key elements / features / characteristics of the baseline. The duration of this effect may be semi-permanent and partially reversible.
Low	Slight change to the value of the receptor. The proposals are similar to a main component of the receptor but similar to other components. The proposals would not be readily noticeable. Minor loss of or alteration to one or more key elements / features / characteristics of the baseline. The duration of this effect may be temporary and reversible.
Negligible	Barely discernible change to the value of the receptor. Very minor loss of or alteration to one or more key elements / features / characteristics of the baseline.
Neutral	No change to the value of the receptor.

Table 2.6 Nature of the Effect Likely to Occur to Receptor (Magnitude)

Likely Significant Effects

2.43 Likely significant effects are determined through combining judgements of sensitivity and magnitude, using a common matrix shared across all topic areas (**Table 2.7**).

Likely Significance of Effect on Receptor			
Magnitude	Sensitivity		
	Low	Moderate	High
Neutral	None	None	None
Negligible	Negligible / Neutral	Negligible / Neutral	Negligible / Neutral
Low	Minor	Minor / Moderate	Moderate
Medium	Minor / Moderate	Moderate	Moderate / Major
High	Moderate	Moderate / Major	Major

Table 2.7 Likely Significance of Effect on Receptor Matrix

2.44 Effects may be beneficial or adverse, as set out in **Table 2.8**.

Likely Significance of Effect	
Major Beneficial	The scheme would be in keeping with and would provide a major improvement to or reinforce the value of the receptor
Moderate Beneficial	The scheme would be in keeping with and would provide a noticeable improvement to or reinforce the value of the receptor
Minor Beneficial	The scheme would be in keeping with and would provide a slight improvement to or reinforce the value of the receptor
Negligible	The scheme would have no effect on the value of the receptor or would be barely perceptible / in keeping with and would maintain the value of the receptor
Minor Adverse	The scheme would have a minor negative effect to the value of the receptor
Moderate Adverse	The scheme would cause a noticeable deterioration in the value of the receptor
Major Adverse	The scheme would cause a major deterioration in the value of the receptor

Table 2.8 Likely Significance of Effect

2.45 Combining respective sensitivity and magnitude matrices provides an indication of the likely significant effects. However, a strict application of the matrices will produce adverse effects where there are even slight changes to the setting of highly sensitive heritage receptors, for example the Westminster World Heritage Site. These noticeable effects will not necessarily, however, harm the cultural significance of a heritage asset. Accordingly the findings of the matrix analysis are subjected to a discursive appraisal to ascertain whether the effect is harmful in qualitative terms.

2.46 Professional judgement is, then, required to determine significant likely effects. Qualitative assessment text is used to describe and elucidate this judgement to the reader. This is necessary because heritage, townscape and visual impact assessment is not a strict quantitative process and some of these considerations will depend on expert judgements more than others. Accordingly there is an emphasis on narrative text throughout this Volume of the ES to describe the receptors and the judgements in regard to the significance of the identified effects. The text also draws out the key issues and ensures that the chapter is accessible to the public and to the competent authority or decision maker.

2.47 Justification for the direction of effects (beneficial, adverse or neutral/ negligible) is discussed within the qualitative assessment text.

2.48 Within the judgement of likely significance of effects there is a distinction between levels of value and direction of effect, expressed as a 'word-scale'. The word-scale set out in **Table 2.8** is consistent for all topic areas (heritage, townscape and visual).

2.49 Ratings of significance are independent of 'acceptability' of the scheme as a whole, which is a judgement above and beyond that of significance. Acceptability is about the overall balance of benefits and harm from the proposals as viewed or weighted by national policy and development plan policies.

2.50 It is generally considered that moderate to major effects are considered 'significant' in the context of the EIA Regulations, and so potentially attracting planning weight. In preparing this assessment we are also mindful that there is a strong presumption against granting planning permission for development which would cause harm to heritage assets precisely because the desirability of preserving the special interest is of considerable importance and weight.

2.51 The report also considers the direct, indirect, cumulative, temporary and long term/permanent effects of the Proposed Development.

2.52 The assessment of direct impacts to heritage assets is considered in the round. The direct effects arise from the proposed changes of appearance, works consequent to that, including the construction of the Proposed Development. The indirect effects arise from the new appearance of the Victoria Tower Gardens, both during the day and at night.

2.53 Direct effects may cause a physical change (e.g. alteration or demolition) to the receptor as a consequence of installation or operation. Indirect effects may occur as a consequence of installation or operation of the Proposed Development, but may have an effect some distance from the Application Sites. Assessment of impacts on heritage setting refers to perceptible visual and aural (noise) effects that can be appreciated at a given time.

2.54 The assessment of the likely significant cumulative effects measures any additional effects of the Proposed Development under consideration, when considered in conjunction with cumulative development hotspots surrounding the Application Sites.

2.55 Broadly, temporary effects are considered to be those associated with the installation phase and long-term/permanent effects are those associated with the operational phase of the Proposed Development.

2.56 'Local', 'district' or 'national' scale is relative to the spatial scale of the effects.

Mitigation

2.57 Measures proposed to prevent, reduce or where possible offset any significant adverse have been identified and developed as part of the design development process and are identified within the report.

Limitations and Assumptions

2.58 Wherever possible, all the heritage assets referred to in this study were visited. However, it has not always been possible to gain access to individual heritage assets, especially those in private ownership. Some assessments of setting are therefore made based on publically accessible views and desktop study.

2.59 The visual assessment is supported by Accurate Visual Representations (AVRs), which provide the basis for the assessment of the Proposed Development and its effect on the agreed key views. As detailed at paragraphs 3.29-32 it is important to note that AVRs, even the most 'realistically' rendered, have limitations. The written assessment makes allowances for these factors as well as the assessor's knowledge of the Proposed Development and has been informed by the visualisations of the Proposed Development, the Design and Access Statements and the drawings submitted for approval.

APPENDIX 2: VERIFIED VIEWS

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VIEW 1: LVMF 18A.2: WESTMINSTER BRIDGE UPSTREAM

EXISTING

A2.5 The view is described in the LVMF thus:

"The river forms the foreground of the view. The wide and relatively clear stretch of the river in this prospect contrasts with many other views from bridges, in which the river is relatively busy and includes many moored boats and barges. Mature trees along both embankments form important middle ground elements. The axial views in this straight portion of the river focus on an unresolved modern part of the city around Vauxhall Station, seen between the strong vertical elements of the listed Millbank Tower and the smaller Westminster Tower, beyond Lambeth Palace.

The pinnacles and towers of the Palace of Westminster, and those of Westminster Abbey behind, are seen against the skyline and are key elements of the Outstanding Universal Value of the Westminster World Heritage Site. The prominence of the Strategically Important Landmark is enhanced by the setting provided by the diminishing trees of Victoria Tower Gardens to the south. The trees accentuate the sense of perspective, while also shielding the cliff-like Thames House buildings, and visually separating the World Heritage Site from the Millbank Tower. There is an emphatic culmination of this River Prospect at the foot of the bridge, with the impressive Clock Tower of the Palace of Westminster most prominent in the view."

A2.6 The value attached to the view is **Very High**.

A2.7 The view would primarily be experienced by a number of pedestrians crossing the bridge. Their focus would be partially on wayfinding, and partially on the view. These visual receptors have a Moderate susceptibility to change and **Medium** sensitivity.

A2.8 In addition, the view would be experienced by a number of road users. Their focus would be on the road ahead, though they would be aware of views towards the WHS. These visual receptors have a **Low** susceptibility to change and **Low** sensitivity.

PROPOSED

A2.9 The Proposed Development would be obscured by the existing built form of the embankment, and the dense vegetation within the park.

A2.10 There would be the potential for some partial, seasonal views towards the monument, but these would be incidental, and not readily noticeable to the casual observer. The focus of the view would remain on the Houses of Parliament. The diminishing tree line within the Victoria Tower Gardens would remain distinct, and thus the contribution made by the Victoria Tower Gardens, and its role in visually separating the WHS from the Millbank Tower, would be preserved.

A2.11 The magnitude of impact would be Negligible.

A2.12 The overall effect would be Negligible. The effect would be direct, local and permanent.

CUMULATIVE

A2.13 None of the cumulative schemes would be visible in conjunction with the Proposed Development. In the cumulative condition, the effect would remain Negligible.



Figure A2.2 View 1 baseline, 2025.



Figure A2.3 View 1 proposed, 2025.



Figure A2.4 View 1 cumulative, 2025.

VIEW 2: LVMF 18A.1: WESTMINSTER BRIDGE UPSTREAM

EXISTING

A2.14 The view is described in the LVMF thus:

"The river forms the foreground of the view. The wide and relatively clear stretch of the river in this prospect contrasts with many other views from bridges, in which the river is relatively busy and includes many moored boats and barges. Mature trees along both embankments form important middle ground elements. The axial views in this straight portion of the river focus on an unresolved modern part of the city around Vauxhall Station, seen between the strong vertical elements of the listed Millbank Tower and the smaller Westminster Tower, beyond Lambeth Palace.

The pinnacles and towers of the Palace of Westminster, and those of Westminster Abbey behind, are seen against the skyline and are key elements of the Outstanding Universal Value of the Westminster World Heritage Site. The prominence of the Strategically Important Landmark is enhanced by the setting provided by the diminishing trees of Victoria Tower Gardens to the south. The trees accentuate the sense of perspective, while also shielding the cliff-like Thames House buildings, and visually separating the World Heritage Site from the Millbank Tower. There is an emphatic culmination of this River Prospect at the foot of the bridge, with the impressive Clock Tower of the Palace of Westminster most prominent in the view."

A2.15 The value attached to the view is **Very High**.

A2.16 The view would primarily be experienced by a number of pedestrians moving to the steps from the bridge. Their focus would be partially on wayfinding, and partially on the view. These visual receptors have a **Medium** susceptibility to change and **Moderate** sensitivity.

A2.17 In addition, the view would be experienced by a number of road users. Their focus would be on the road ahead, though they would be aware of views towards the WHS. These visual receptors have a **Low** susceptibility to change and **Low** sensitivity.

PROPOSED

A2.18 The Proposed Development would be obscured by the existing built form of the embankment, and the dense vegetation within the park.

A2.19 There would be the potential for some partial, seasonal views towards the monument, but these would be incidental, and not readily noticeable to the casual observer.

A2.20 The focus of the view would remain on the Houses of Parliament, and the contribution made by the diminishing tree line to the prominence of the Strategically Important Landmark would be preserved.

A2.21 The magnitude of impact would be Negligible.

A2.22 The overall effect would be Negligible. The effect would be direct, local and permanent.

CUMULATIVE

A2.23 None of the cumulative schemes would be visible in conjunction with the Proposed Development. In the cumulative condition, the effect would remain Negligible.



Figure A2.5 View 2 baseline, 2025.



Figure A2.6 View 2 proposed, 2025.

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Figure A2.7 View 2 cumulative, 2025.

VIEW 3: LVMF 22A.3 - ALBERT EMBANKMENT OPPOSITE PALACE OF WESTMINSTER

EXISTING

A2.24 The view is described in the LVMF thus:

"The foreground is the river, while the viewer's eye is drawn to the fine architectural detail of the monument. Trees along the Embankment to either side of the Palace of Westminster form an important element in the views, partially screening riverside buildings. The prominence of the Palace of Westminster is maintained by the generally limited height of the riverside buildings to its north.

There is no visual intrusion above the Strategically Important Landmark close to the axial position other than the towers of Westminster Abbey. Distant tall buildings, such as Centre Point, can be seen in the background of views from certain angles from further south along the Embankment."

A2.25 The value attached to the view is **Very High**.

A2.26 The view would primarily be experienced by a number of pedestrians. Their focus would be partially on wayfinding, and partially on the view. These visual receptors have a **Medium** susceptibility to change and **Moderate** sensitivity.

PROPOSED

A2.27 The Proposed Development would be obscured by the existing built form of the embankment, and the dense vegetation within the park.

A2.28 The focus of the view would remain on the Houses of Parliament, and the mature trees along the embankment would remain a distinct element. The prominence of the Strategically Important Landmark would preserved.

A2.29 The magnitude of effect would be Nil.

A2.30 The overall effect would be Nil. The effect would be direct, local and permanent.

CUMULATIVE

A2.31 None of the cumulative schemes would be visible in conjunction with the Proposed Development. In the cumulative condition, the effect would remain Nil.



Figure A2.8 View 3 baseline, 2025.



Figure A2.9 View 3 proposed, 2025.



Figure A2.10 View 3 cumulative, 2025.

VIEW 4: LVMA 22A.2: ALBERT EMBANKMENT OPPOSITE THE PALACE OF WESTMINSTER

EXISTING

A2.32 The view is described in the LVMF thus:

"The foreground is the river, while the viewer's eye is drawn to the fine architectural detail of the monument. Trees along the Embankment to either side of the Palace of Westminster form an important element in the views, partially screening riverside buildings. The prominence of the Palace of Westminster is maintained by the generally limited height of the riverside buildings to its north.

There is no visual intrusion above the Strategically Important Landmark close to the axial position other than the towers of Westminster Abbey. Distant tall buildings, such as Centre Point, can be seen in the background of views from certain angles from further south along the Embankment."

A2.33 The value attached to the view is **Very High**.

A2.34 The view would primarily be experienced by a number of pedestrians. Their focus would be partially on wayfinding, and partially on the view. These visual receptors have a **Medium** susceptibility to change and **Moderate** sensitivity.

PROPOSED

A2.35 The Proposed Development would be obscured by the existing built form of the embankment, and the dense vegetation within the park.

A2.36 The focus of the view would remain on the Houses of Parliament, and the mature trees along the embankment would remain a distinct element. The prominence of the Strategically Important Landmark would preserved.

A2.37 The magnitude of impact would be Nil.

A2.38 The overall effect would be Nil. The effect would be direct, local and permanent.

CUMULATIVE

A2.39 None of the cumulative schemes would be visible in conjunction with the Proposed Development. In the cumulative condition, the effect would remain Nil.



Figure A2.11 View 4 baseline, 2025.



Figure A2.12 View 4 proposed, 2025.



Figure A2.13 View 4 cumulative, 2025.

VIEW 5: RIVER THAMES

EXISTING: SUMMER

A2.40 This viewpoint is situated on the south bank of the river, oriented west across the river towards the Victoria Tower Gardens and Houses of Parliament within the Westminster World Heritage Site. The foreground of the view has an open character, comprised river with its busy maritime traffic. The docked fuel boats within the river space provide interest in the middle ground.

A2.41 The viewer's eye is drawn to the Palace of Westminster, which forms the focus of the view in the middle ground. The Victoria Tower is the tallest element in the centre of the view, and the step-down to the dense tree belt in the Victoria Tower Gardens contributes to its prominence.

A2.42 Some development is visible behind the tree line, along Millbank, which befits the city centre location, and forms part of the

A2.43 To the right hand side of the view, a range of taller development including Millbank Tower (grade II) and the St George Wharf Tower is visible due to the curve in the river, though this is understood separately from the immediate context of the World Heritage Site.

A2.44 The value attached to the view is **High**.

A2.45 The view would primarily be experienced by a number of pedestrians. Their focus would be partially on wayfinding, and partially on the view. These visual receptors have a **Medium** susceptibility to change and Moderate sensitivity.

EXISTING: WINTER

A2.46 In winter, the character and focus of the view remains the same. The tree cover within the Victoria Tower Gardens is less dense, and the space within the park is more visible, including the temporary buildings within Black Rod's Garden.

A2.47 The overall character of the view is the same in the winter condition. The value does not change.

PROPOSED: SUMMER

A2.48 The Proposed Development would be largely obscured by the existing built form of the embankment, and the dense vegetation within the park.

A2.49 There would be some partial visibility of the lower parts of the bronze fine through the tree line, however, the material palette is in keeping with the character of the parkland space, and the change would not be readily noticeable to the casual observer.

A2.50 The focus of the view would remain on the Houses of Parliament, and the mature trees along the embankment would remain a distinct element.

A2.51 The magnitude of impact would be Nil.

A2.52 The effect would be direct, local and permanent.

EXISTING: WINTER

A2.53 The lower parts of the bronze fins and the sloping gradient of the memorial would be partially visible from this perspective. The material palette is in keeping with the character of the parkland space, and the gradient would not change the parkland character of this part of the view, or impede the appreciation of the World Heritage Site buildings which form the view's focus.

A2.54 The Proposed Development would preserve the character and amenity of the view, and the ability to appreciate the Houses of Parliament and the Victoria Tower would be unimpeded.

A2.55 The effect would be **Negligible**.

A2.56 The effect would be direct, local and permanent.

CUMULATIVE: SUMMER

A2.57 None of the cumulative schemes would be visible in conjunction with the Proposed Development. In the cumulative condition, the effect would remain **Nil**.

CUMULATIVE: WINTER

A2.58 In winter, there is the potential for some partial visibility of the uppermost parts of development in the background of the view. This would be read separately from the Proposed Development, and would be understood as part of the wider built form on the north bank of the river.

A2.59 In the current cumulative condition, the effect would remain Negligible.



Figure A2.14 View 5 baseline, 2025.



Figure A2.15 View 5 proposed, 2025.

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Figure A2.16 View 5 cumulative, 2025.

VIEW 6: LVMF 22A.1: ALBERT EMBANKMENT OPPOSITE THE PALACE OF WESTMINSTER

EXISTING: SUMMER

A2.60 The view is described in the LVMF thus:

"The foreground is the river, while the viewer's eye is drawn to the fine architectural detail of the monument. Trees along the Embankment to either side of the Palace of Westminster form an important element in the views, partially screening riverside buildings. The prominence of the Palace of Westminster is maintained by the generally limited height of the riverside buildings to its north.

There is no visual intrusion above the Strategically Important Landmark close to the axial position other than the towers of Westminster Abbey. Distant tall buildings, such as Centre Point, can be seen in the background of views from certain angles from further south along the Embankment."

A2.61 The value attached to the view is **Very High**.

A2.62 The view would primarily be experienced by a number of pedestrians. Their focus would be partially on wayfinding, and partially on the view. These visual receptors have a **Medium** susceptibility to change and Moderate sensitivity.

EXISTING: WINTER

A2.63 In winter, the character and focus of the view remains the same, with the Palace of Westminster and Westminster Abbey remaining the focal points of the view.

A2.64 The tree cover within the Victoria Tower Gardens is less dense, and the space within the park is more visible, including the learning centre and temporary buildings within Black Rod's Garden.

A2.65 The winter condition allows for some partial views towards the Buxton Memorial from this perspective, which add interest to the space within the park.

A2.66 The overall character of the view is the same in the winter condition. The value does not change.

PROPOSED: SUMMER

A2.67 The Proposed Development is entirely obscured by the dense tree cover along the Victoria Embankment. The focus of the view remains on the Palace of Westminster.

A2.68 The magnitude of impact would be Nil.

A2.69 The effect would be direct, local and permanent.

PROPOSED: WINTER

A2.70 In the winter condition, the memorial would be partially visible behind the tree line. Its scale would be well below the tree line, and the material palette integrates well with the character of the park space. The Buxton Memorial would remain visible, and would be legible separate from the Proposed Development due to its differing materials and style.

A2.71 The Palace of Westminster and protected silhouette would remain pre-eminent in the view.

A2.72 The overall effect would be Negligible.

A2.73 The effect would be direct, local and permanent.

CUMULATIVE: SUMMER

A2.74 None of the cumulative schemes would be visible in conjunction with the Proposed Development. In the cumulative condition, the effect would remain **Nil**.

CUMULATIVE: WINTER

A2.75 In winter, there is the potential for some partial visibility of the uppermost parts of development in the background of the view. This would be read separately from the Proposed Development, and would be understood as part of the wider built form on the north bank of the river.

A2.76 Therefore, in the cumulative condition, the effect would remain Negligible.



Figure A2.17 View 6 baseline, 2025.



Figure A2.18 View 6 proposed, 2025.



Figure A2.19 View 6 cumulative, 2025.

VIEW 16: TC6A

EXISTING

A2.77 This viewpoint is situated within the Victoria Tower Gardens, oriented south towards the Application Site.

A2.78 From this viewpoint, the wedge-shape of the gardens is apparent, framed by the two lines of mature plane trees which flank the boundary. The space within the park is flat, and the viewer's eye is drawn towards the obelisk at the junction with Lambeth Bridge in the background.

A2.79 Whilst largely located outside the frame, Rodin's Burghers of Calais sculpture is situated to the viewer's immediate left, and would be a prominent part of the experience within this area of the park. The area of hardstanding surrounding the monument comprises some of the foreground.

A2.80 The Buxton Memorial is a prominent feature which draws the viewer's eye in the middle ground.

A2.81 Outside the park, the linear route of Millbank to the right hand side is defined by the mature trees, and continuous building line. The viewer would also be aware of heavy traffic moving along the road.

A2.82 To the right hand side, the open space of the river creates a sense of depth in the view, and allows views towards Lambeth Bridge in the background.

A2.83 To the right of the view, the former building at 7 Millbank has been demolished; the site is currently under construction and enclosed by hoarding. While the trees lining the thoroughfare have matured, as the photography was captured in autumn results in reduced foliage density, which provides greater visual permeability through the canopy compared to summer months. These visual changes do not impact the value of the view as compared to the 2019 scenario.

A2.84 The value attached to the view is **Medium**.

A2.85 The view would primarily be experienced by a number of users of the amenity space within the park. Their focus would be on their respective activities, and the experience within the Victoria Tower Gardens. These visual receptors have a **Medium** susceptibility to change and Moderate sensitivity.

A2.86 In addition, the view would be experienced by a number of pedestrians, moving through the park space. Their focus would be on wayfinding. These visual receptors have a **Low** susceptibility to change and **Moderate** sensitivity.

PROPOSED

A2.87 The foreground of the view would remain open, with hard standing in the environs of the Burghers of Calais sculpture, and a wide expanse of lawn.

A2.88 The viewpoint would be experienced by visitors to the memorial on their approach through the park. The creation of a winding path across the open space would draw the viewer's eye towards the sloped landscaping in the middle ground.

A2.89 The bronze fins would be visible above the earth mound of the memorial, and form a visual attractive, sculptural element in the middle ground, befitting the symbolic purpose of the memorial.

A2.90 The skylight illuminating the below-ground learning centre is visible part way up the slope, and would contribute to the viewer's understanding of the memorial as a whole.

A2.91 Whilst the lower parts of the Buxton Memorial would be obscured, the polychromatic roof would remain the tallest feature within the park from this viewpoint, and would continue to draw the viewer's eye.

A2.92 The magnitude of impact would be Medium.

A2.93 There is a fine judgment to be made about the nature of the impact. Owing to the high quality of the design, its symbolic quality and the improvements to the landscaping, our assessment concludes that the Proposed Development would give rise to a Moderate Beneficial effect to visual receptors. The effect would be direct, local and permanent.

CUMULATIVE

A2.94 None of the cumulative schemes would be visible in conjunction with the Proposed Development. In the cumulative condition, the effect would remain Moderate Beneficial.



Figure A2.20 View 16 baseline, 2025.



Figure A2.21 View 16 proposed, 2025.

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Figure A2.22 View 16, cumulative, 2025.

VIEW 18: TC3A

EXISTING: DAYTIME

A2.95 The viewpoint is situated on the west side of the Victoria Tower Gardens, oriented south east, towards the Application Site and the Buxton Memorial.

A2.96 From this viewpoint, the Gothic pointed arches and polychromatic roof of the memorial can be appreciated. It is situated within an area of hardstanding which forms the path across the park between Millbank and the river, and as such thus has a transient character.

A2.97 The view has an open, parkland character, comprised of the space within the park, defined by the mature plane trees and dense hedge boundaries at ground level which mark the boundary with Millbank Beyond.

A2.98 Development in the background of the view comprises a largely continuous row of office buildings, with a regular building line which frames the view. To the left hand side, there are some views out of the park towards the junction with Lambeth Bridge.

A2.99 As seen in the 2025 AVR, there are some visual changes since the photography captured in 2018. In the background of the view, 7 Millbank has been removed and is replaced by construction and scaffolding. Within the gardens, Buxton memorial has been restored and is surrounded scaffolding. These visual changes do not impact the quality of the view as compared to the 2019 scenario.

A2.100 The value attached to the view is **Medium**.

A2.101 The view would primarily be experienced by a number of users of the amenity space within the park. Their focus would be on their respective activities, and the experience within the Victoria Tower Gardens. These visual receptors have a **Medium** susceptibility to change and **Moderate** sensitivity.

A2.102 In addition, the view would be experienced by a number of pedestrians, moving through the park space. Their focus would be on wayfinding. These visual receptors have a **Low** susceptibility to change and **Moderate** sensitivity.

EXISTING: NIGHT TIME

A2.103 At night time, the character of the view remains the same. The parkland and the Buxton Memorial are not illuminated, and thus the viewer's attention is drawn to the brightly lit buildings along Millbank.

A2.104 Traffic moving along the road would also become more prominent by virtue of its illumination.

A2.105 We note that the park is closed for some night time hours, and thus appreciation of the view would be limited.

PROPOSED: DAYTIME

A2.106 The Proposed Development would introduce a new feature to the middle ground of the view. This point would likely be reached by visitors to the park who have passed the gentle introduction to the sloping landscape, which from here is given purpose and meaning.

A2.107 The interesting, angular form of the bronze fins would frame the new mound created in the landscape, and create interest in the middle ground of the view, and a sense of depth would be understood from the spacing of its bronze fins. The entrance pavilion and play area, whilst partially visible, would not feature prominently in the view.

A2.108 The scale responds to the neighbouring context, and the tallest fins remain below the line of the Buxton Memorial, which preserves its prominence. The hard and soft landscaping scheme includes a low boundary fence comprised of spaced vertical columns, responding to the materiality and form of the entrance pavilion, and forming an unobtrusive boundary which allows for the continued appreciation of the Buxton Memorial, as well as views across the courtyard space.

A2.109 The setting of the Buxton Memorial is improved in the view with planting and the creation of a low seating wall, which creates a sense of destination.

A2.110 The foreground of the view would include the planned landscaping scheme, with paths towards the Buxton Memorial and the Proposed Development, improving permeability to the visitor, and inviting exploration of the park.

A2.111 The magnitude of impact would be Medium.

A2.112 The Proposed Development would give rise to a Moderate Beneficial effect to visual receptors. The effect would be direct, local and permanent.

PROPOSED: NIGHT TIME

A2.113 The illumination of the Proposed Development would create interest within the park at night time, creating a focus within the park.

A2.114 The illuminated markers along the pathways would facilitate movement through the park during hours of darkness.

A2.115 As in the existing condition, we note that the opening hours of the park are limited, and thus this view would only be experienced at certain times.

A2.116 The effect would remain Moderate Beneficial.

CUMULATIVE: DAYTIME

A2.117 None of the cumulative schemes would be visible in conjunction with the Proposed Development. In the cumulative condition, the effect would remain Moderate Beneficial.

CUMULATIVE: NIGHT TIME

A2.118 None of the cumulative schemes would be visible in conjunction with the Proposed Development. In the cumulative condition, the effect would remain Moderate Beneficial.



Figure A2.23 View 18 baseline, 2025.



Figure A2.24 View 18 baseline, night, 2025.



Figure A2.25 View 18 proposed, 2025.



Figure A2.26 View 18 proposed, night, 2025.



Figure A2.27 View 18 View 18 cumulative, 2025.



Figure A2.28 View 18 cumulative, night, 2025.

VIEW 21: TC6C

EXISITING

A2.119 This viewpoint is situated on the pedestrian path to the west side of Victoria Tower Gardens, oriented south.

A2.120 The focus of the view comprises the open space of the park, consisting of a wide lawn to the viewer's left, and a curved footpath which draw's the viewer's eye towards the background. The Buxton Memorial is a prominent feature in the middle- background of the view, within the expanse of the park.

A2.121 The space within the park is framed by mature plane trees at regular intervals, between which views towards the river and Lambeth Bridge contribute to a sense of depth.

A2.122 The viewer would be aware of the busy vehicular route along Millbank to the right-hand side of the frame.

A2.123 In the 2025 AVR, the former building at 7 Millbank has been demolished; the site is currently under construction and enclosed by hoarding. The trees have visibly matured, however as the autumn photography results in reduced foliage density, particularly along the riverbank to the left-hand side. In the background of the view, the Buxton memorial has been restored and is consequently surrounded by scaffolding. These modifications represent the current baseline conditions and do not alter the overall composition or quality of the view relative to the 2019 scenario.

A2.124 The value attached to the view is **Medium**.

A2.125 The view would primarily be experienced by a number of users of the amenity space within the park. Their focus would be on their respective activities, and the experience within the Victoria Tower Gardens. These visual receptors have a Medium susceptibility to change and Moderate sensitivity.

A2.126 In addition, the view would be experienced by a number of pedestrians, moving through the park space. Their focus would be on wayfinding. These visual receptors have a **Medium** susceptibility to change and **Moderate** sensitivity.

PROPOSED

A2.127 From this viewpoint, the sculpted bronze fins of the Proposed Development can be individually discerned, and their sculptural form contrasts with the gentle slope of the undulating landscaped ground. The skylight providing light to the learning centre below would contribute to the viewer's understanding of the function of the memorial as a whole.

A2.128 The Buxton Memorial would be partially obscured from this perspective, though the viewer would be aware of its presence and the spire remains a feature of the view.

A2.129 The viewer would have an oblique view of the fins of the memorial, which would introduce a new feature of interest in the middle ground of the view. The new hard landscaping would create a wider and high quality pedestrian route towards the rear of the park which would draw the viewer's eye and invite movement. The undulating open grassed landscaping also invites the viewer to explore this new aspect of the gardens.

A2.130 The striking form of the monument befits its monumental purpose, and makes an attractive contribution to the view.

A2.131 The magnitude of impact would be Medium.

A2.132 The Proposed Development would give rise to a Moderate Beneficial effect to visual receptors. The effect would be direct, local and permanent.

CUMULATIVE

A2.133 None of the cumulative schemes would be visible in conjunction with the Proposed Development. In the cumulative condition, the effect would remain Moderate Beneficial.



Figure A2.29 View 21 baseline, 2025.



Figure A2.30 View 21 proposed, 2025.

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Figure A2.31 View 21 cumulative, 2025.

VIEW 22: VICTORIA TOWER GARDENS

EXISTING: DAYTIME

A2.134 This viewpoint is situated within the open space of Victoria Tower Gardens, oriented north towards the Houses of Parliament and Westminster World Heritage Site.

A2.135 The fore and middle ground of the view comprise the open space of the park, intersected by the path leading to the Buxton Memorial, which is an important landmark in the view.

A2.136 The viewer's focus is drawn towards the background of the view, where the buildings of the Westminster World Heritage Site can be appreciated from within the open space of the park. No additional built form is visible behind the buildings, which terminate the view.

A2.137 The view is framed by the dense lines of London Plane Trees which frame the open space of the park, and to the right hand side, some views towards Westminster Bridge contribute to a sense of depth in the view.

A2.138 In the 2025 AVR, the restoration of the Buxton Memorial is visible in the foreground of the view, with a new path visible surrounding the memorial and scaffolding. In the background of the view, the scaffolding which enclosed the Elizabeth Tower in 2019, is now removed, allowing for clearer visibility of the heritage receptor. These visual changes do not impact the value of the view as compared to the 2019 scenario.

A2.139 The value attached to the view is **High**.

A2.140 The view would primarily be experienced by users of the amenity space within the park. Their focus would be on their respective activities, and the experience within the Victoria Tower Gardens. These visual receptors have a **Medium** susceptibility to change and Moderate sensitivity.

A2.141 In addition, the view would be experienced by a number of pedestrians, moving through the park space. Their focus would be on wayfinding. These visual receptors have a **Medium** susceptibility to change and Moderate sensitivity.

EXISTING: NIGHT TIME

A2.142 In the night time view, the dark space within the park contrasts with the illuminated Victoria Tower and Clock Tower of the Palace of Westminster, which draw the viewer's eye. Light from Millbank to the left hand side erodes this distinction, and contributes to the sense of a city centre location.

A2.143 The Buxton Memorial is not illuminated, and is thus a less prominent feature than in the day time view.

A2.144 The value of the view remains the same.

A2.145 As noted elsewhere in this document, access to the park is limited during night time hours, and this view would only be appreciated during opening hours.

PROPOSED: DAYTIME

A2.146 The foreground of the view would take in the courtyard space at the entrance to the Memorial and Learning Centre. Landscaping within the courtyard includes planted boundaries along both sides of the space, and ground and tree planting within. New seating is proposed, and the spaced vertical columns of the boundary fence allow light and views through to the Buxton Memorial, and the park beyond.

A2.147 The viewer's attention is drawn towards the bronze fins, and between them, the entrances to the Learning Centre below. The Proposed Development will necessarily result in a loss of openness in the landscape as seen from this perspective.

A2.148 The forma and appearance of the memorial positively responds to the perpendicular quality of the World Heritage Site buildings, and its fins break up the scale of the memorial. Its striking, emphatic form is appropriate to its symbolic purpose, and forms part of the visitor's journey into the learning centre below.

A2.149 The Proposed Development interposes elements of views of the Palace of Westminster, though the upper parts of the Victoria Tower and the Elizabeth Tower remain clearly visible and dominant and the remainder of the Palace can be seen between and above the fins.

A2.150 The high quality of the design and landscaping scheme make a positive contribution to visual amenity, creating an attractive memorial which invites the viewer's exploration.

A2.151 The fins step down in scale towards the Buxton Memorial to the right, and allow for the continued appreciation of its form from this location.

A2.152 The curved aspect of the courtyard boundary integrates the two memorials, and allows for the appreciation of the Buxton Memorial's heritage value from the courtyard and an improved aspect of the setting of the Buxton Memorial from which it can be appreciated.

A2.153 Due to the change in the view toward the World Heritage Site, the magnitude of effect would be High.

A2.154 The Proposed Development would give rise to a Moderate Beneficial effect to visual receptors. The effect would be direct, local and permanent.

PROPOSED: NIGHT TIME

A2.155 At night time, the space between the fins would be illuminated, and draw the viewer's eye towards the entrance to the learning centre. Subtle and discrete ground level lighting would assist in wayfinding within the courtyard.

A2.156 The illuminated Victoria Tower and the Elizabeth Tower in the background would remain a prominent feature behind the memorial.

A2.157 The overall effect would thus remain Moderate Beneficial.

CUMULATIVE: DAYTIME

A2.158 None of the cumulative schemes would be visible in conjunction with the Proposed Development. In the cumulative condition, the effect would remain Moderate Beneficial.

CUMULATIVE: NIGHT TIME

A2.159 In the night time views, none of the cumulative schemes would be visible in conjunction with the Proposed Development. The effect would remain Moderate Beneficial.



Figure A2.32 View 22 baseline, 2025.



Figure A2.33 View 22 baseline, night, 2025.

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Figure A2.34 View 22 proposed, 2025.



Figure A2.35 View 22 proposed, night, 2025.



Figure A2.36 View 22 cumulative, 2025.



Figure A2.37 View 22 cumulative, night, 2025.

VIEW 23: SOUTHERN EXTENT OF VICTORIA TOWER GARDENS

EXISTING

A2.160 This viewpoint is situated within the play area space in Victoria Tower Gardens, towards its southern extent. The viewer would be aware of public toilets behind to their right, which are frequented by pedestrians.

A2.161 The view takes in the wide space of hard standing in the foreground, and an irregular range of children's play equipment in the middle ground. The extent of this space is defined by the anterior side of the curved Spicer Memorial. The park is defined by the low embankment wall to the right, and the two mature bands of trees to both sides.

A2.162 The Victoria Tower is the tallest feature in the view, with the clock tower partially visible to the right, though this is not a position from which their form and value can be best appreciated.

A2.163 The continuous line of buildings along Millbank defines the view to the left, whilst the open space of the river to the viewer's right allows some views through the trees towards Westminster Bridge and the opposite bank.

A2.164 The Buxton Memorial is partially discernible to the right hand side, though its lower parts are obscured by the existing built form.

A2.165 Within the 2025 photography, there are some visual changes to the view. In the foreground of the view, the trees have grown. This increased maturity has resulted in screening of the Victoria Tower and Elizabeth Tower, however owing to their ornate quality, these elements remain dominant features of the background. These visual changes do not impact the value of the view as compared to the 2019 scenario.

A2.166 The value attached to the view is Medium.

A2.167 The view would primarily be experienced by a number of visitors to the play area, and users of the amenity space within the park. Their focus would be on their respective activities within the park space. In addition, the view would be experienced by a number of pedestrians, whose focus would be on wayfinding and moving through the park. These visual receptors have a Low susceptibility to change and Moderate sensitivity.

PROPOSED

A2.168 At site preparation and construction phase, following the adoption of the identified mitigation measures in the Construction Management Plan (Appendix C to Volume 5 of the ES) the presence of hoardings and construction activity is likely to result in a temporary Minor Adverse effect, however these would be temporary and are considered to be an expected part of a development site within a central London location.

A2.169 The character of the view, and the differentiation between the open space of the play area and built form in the middle ground, would remain.

A2.170 From this position, the viewer is able to appreciate the relationship between the materiality and form of the fins and the buildings of the Palace of Westminster in the background of the view.

A2.171 The Victoria Tower is partially obscured by the memorial, though, as discussed previously, this would not be an obvious place from which to appreciate its form. The triangular roof form of the entrance pavilion forms an attractive, sculptural addition, which has a lightweight form to allow views and light in and out of the space within the memorial courtyard, creating a sense of permeability in the middle ground of the view.

A2.172 The Buxton Memorial remains a prominent feature to the viewer's right, seen in conjunction with the sculptural Holocaust Memorial adjacent, and the curved form of the Spicer Memorial.

A2.173 The enhanced planting to either side of the park, and in the middle ground, softens the appearance of the built form and the upgraded play area, and makes a positive contribution to the view.

A2.174 The magnitude of impact would be medium. The overall effect would be Minor Beneficial. The effect would be direct, local and permanent.

CUMULATIVE

A2.175 None of the cumulative schemes would be visible in conjunction with the Proposed Development. In the cumulative condition, the effect would remain Minor Beneficial.



Figure A2.38 View 23 baseline, 2025.



Figure A2.39 View 23 proposed, 2025.

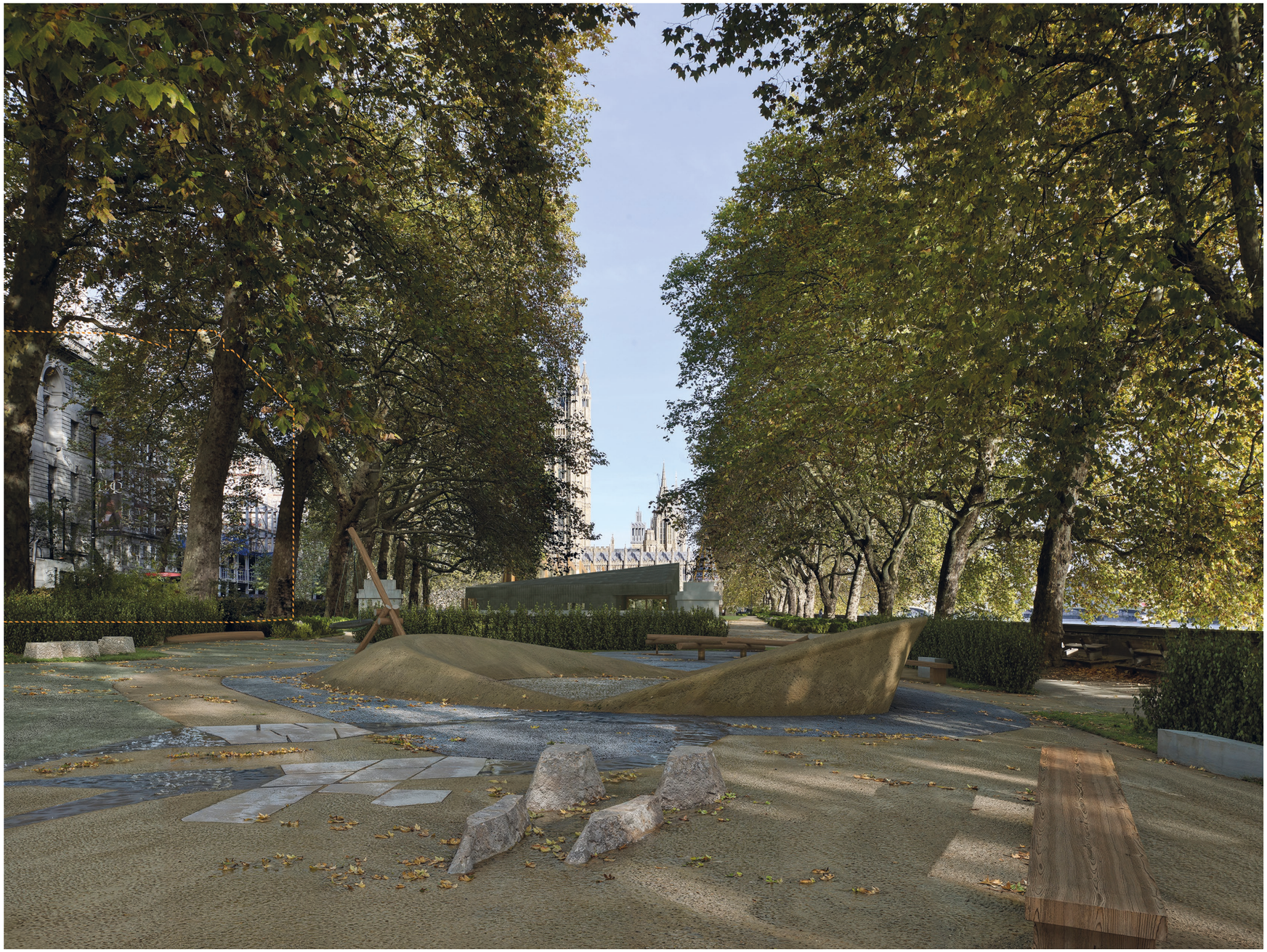

Figure A2.40 View 23 cumulative, 2025.

APPENDIX 3: VERIFIED VIEWS COMPARISON 2019-2025 (HAYES DAVIDSON)

UNITED KINGDOM HOLOCAUST MEMORIAL AND LEARNING CENTRE

HAYES DAVIDSON



AJ006_Holocaust Memorial

Adjaye Associates

09/12/2025

View 16
TC6A

2019



View 16
TC6A

2025



View 18
TC3A

2019



View 18
TC3A

2025



View 18N
TC3A (Night)

2025



View 18N
TC3A (Night)

2025



View 21
TC6C

2019



View 21
TC6C

2025



View 22
Victoria Tower Gardens

2019



View 22
Victoria Tower Gardens

2025



View 22N
Victoria Tower Gardens (Night)

2019



View 22N
Victoria Tower Gardens (Night)

2025



View 23
Playground View

2019



View 23
Playground View

2025



HAYES DAVIDSON

Thank you

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APPENDIX 4: VERIFIED VIEWS METHODOLOGY (HAYES DAVIDSON)

UNITED KINGDOM HOLOCAUST MEMORIAL AND LEARNING CENTRE

HAYES DAVIDSON



AJ006_Holocaust Memorial

Methodology

1. Qualifications

1.1. Hayes Davidson was founded in 1989 to specialise in computer aided architectural illustration. The company has a team which deals exclusively in the creation of three dimensional digital models and the representation of buildings and cities. The team is overseen by Joint Managing Partners David Bullock and Neil Hughes, and is coordinated on a day to day basis by partners all of whom have architectural, technical and artistic experience. A Planning and/or Technical Director oversee all projects where geometric definition and accuracy is required. Hayes Davidson has been invited to sit on judging panels for a number of architectural illustration awards, and lecture on computer aided illustration techniques, perception and three dimensional representation.

1.2. Hayes Davidson is an employee-owned studio based in Paddington founded by Alan Davidson. Alan Davidson pioneered the original verification process for illustrative planning imagery and provided key evidence at inquiry for many of London's high profile schemes. His legacy, an eye for detail and keen understanding of visual perception continues as a strong guiding principle in every project undertaken by the team.

1.3. Hayes Davidson is considered to be one of the most experienced architectural computer imaging companies working in the UK having produced over 40,000 'virtual' or 'computer aided' images since 1989. The work of Hayes Davidson has been acknowledged as pioneering; advancing the use of computer technologies in the representation of buildings. The work of the studio has been widely published. Some of Hayes Davidson's computer generated artwork forms part of the Royal Institute of British Architects Drawings Collection.

1.4. The following reference for Hayes Davidson comes from Dr. Neil Bingham, Assistant Curator of the Royal Institute of British Architects Drawings Collection:

1.5. "The RIBA Drawings Collection was established at the foundation of the RIBA in 1834, now holds an estimated 3/4 million drawings, and is considered one of the finest architectural collections in the world. Since 1994, the RIBA has been acquiring the work of Hayes Davidson. The Drawings Collection recognise their work as representing some of the highest quality and most important architectural illustration of the late 20th Century."

1.6. Hayes Davidson has produced evidence for the Heron Tower, Doon Street Tower, 1+20 Blackfriars, Newcastle Quayside, High Holborn and the London Bridge Tower Public Inquiries. On many occasions the material produced by Hayes Davidson has been accepted and praised by the Inquiry.

2. Work commissioned

2.1. Hayes Davidson were commissioned by Adjaye Associates.

2.2. All drawn and digital information regarding the proposed development was supplied to Hayes Davidson in digital format by Adjaye Associates.

2.3. The number of viewpoints selected was considered proportionate to the scale of the development, Sensitivity of the receptors and Magnitude of potential landscape and visual change.

3. Choice of simulation technique and media employed

3.1. It is important to emphasise that no media can currently reproduce the human experience of viewing a scene. There is no method of analysis or representation that will accurately summarise every lighting, material, social, sensory or climatic condition.

3.2. A photomontage is the superimposition of an image onto a photograph for the purpose of creating a realistic representation of proposed or potential changes to a view. Printed photomontage allows the highest resolution and allows the eye to see the greatest detail. In this way it starts to simulate the effect of looking at a view from a single position.

3.3. All photomontages produced by Hayes Davidson are Type 4 Visualisations, which are described as the 'most sophisticated, in terms of equipment, processing and presentation' by the Landscape Insititute Technical Guidance Note of 2019 (Paragraph 3.5.2). The objective of Type 4 visualisation is to present a printed image which gives a realistic impression of scale and detail (4.5.10) and represents the highest level of accuracy and verifiability for use in the most demanding of situations (Para 4.1.1).

3.4. The Accurate Visual Representation (AVR) level for each image was selected based on what was required to best illustrate the proposal, as determined by the visibility and/or proximity to the scheme (LI Para 6.4.1).

3.5. Setting aside time of day and year and local climatic conditions, the different aspects of a building that contribute to its aesthetic appearance can be summarised as follows: (For the purpose of simplicity we will disregard the speed of walking and social and other sensory influences but these are also relevant).

1. proportion (height, width)
2. distance/depth from viewer
3. outline and definition of building edges
4. the viewers 360º awareness of the surroundings
5. position in view
6. the effect of light on and the nature of the buildings materials
7. night lighting
8. nature of surrounding buildings/structures (shadowing and reflection)

3.6. Not all simulation techniques can be verified and where detailed analysis of materials and their behaviour to light are to be considered, no wholly objective analysis method is possible, and the architect and Hayes Davidson work together to apply subjective judgement.

4. Photography

4.1. All photography was carried out by a professional architectural photographer using the following equipment:

Camera: Arca Swiss 69 F-Line Metric, PhaseOne P45

Lens: Rodenstock Apo-Sironar Digital 35mm

4.2. The images were processed by the photographer to achieve results that best reflected the baseline conditions of each scene at the time of the photography and includes the extent of the site and sufficient context. Photography was secured in good, clear weather conditions wherever reasonably possible (Appendix 4 and GLVIA3 para 8.22). Where a single image is unable to demonstrate the extent of the proposal under consideration and its relevant landscape context, a Multi-Panel image was required.

4.3. Each scene was recorded using a survey marker to accurately identify the view location. A plumb line was used to ensure that the centre of the camera was directly over the surveyed viewing position at a height of 1.60 metres. A log was kept of the time and date that each photograph was taken so that lighting conditions could be recreated in the computer model.

4.4. There is no single definitive camera and lens format that is suitable for all photomontage planning work. Choices need to be made with care and clearly explained through method statement/annotation. Townscape photography taken with a 40º lens (50mm lens/35mm camera) is most often likely to be inadequate for purpose and is not recommended. To insist, as some do, that only 40º lenses should be used is unrealistic. If chosen appropriately, correctly annotated, and with professional understanding by those assessing, there is little to be lost by using wider angle lenses (up to 70º), as this can add peripheral information that more closely reflects our 'experience' of a scene. Departures from FFS + 50mm FL are accepted provided that the reasoning for this departure can be explained and agreed with the competent authority (LI Para 4.5.3).

4.5. Very wide angle single lens views can minimise impact and as such this technique is also inappropriate. Through a careful choice of lenses that allow wider fields of view, townscape is able to be better assessed. The use of hybrid lenses/photographic solutions (ref. Multi-Lens section 7.3) ensures that distortion issues can be minimised for panoramic images.

4.6. Hayes Davidson recommends that all parties are mindful that Environmental Statement photomontage should be used as a complement to site based assessment.



fig 1a The camera



fig 1b The camera in position



fig 2 Example of processed image

5. Surveying

5.1. Hayes Davidson identified key static points such as building corners, garden features and fencing within each photograph. A chartered measured engineering surveying company surveyed the points as described below and the information was issued digitally. The surveyors identified 3 or 4 objects within the scene, which fell along the horizon line of each photograph. Numbered camera positions were surveyed using line of sight surveying and aligned to the local site grid in easting, northing and elevation supplied by the architect and to the Ordnance Survey National Grid (OSGB36) in easting and northing, and in elevation to the Ordnance Survey Datum (OSD) using the OSTN02 GPS transformation.

5.2. A line of sight, two station baseline is established, coordinated and levelled utilising GPS observations.

5.3. The survey control stations were observed by GPS observations and traversed from GPS-observed points. The Ordnance Survey OSNET active GPS correction service was used to transform the data to the Ordnance Survey National Grid and Datum and is accurate in both position and height. Relative height accuracies comparable to geodetic levelling can be achieved, without visiting any existing OS bench marks. Finally, these positions are transformed to the local grid and to a 'pseudo' OS grid which has a scale factor of 1.0.

5.4. A Total Station capable of measuring horizontal and vertical angle observations combined with an internal co-axial non contact distance measuring device accurately measured and stored the three dimensional coordinates of the key features from the control stations.

5.5. The required horizon line within the image is established using the horizontal collimation of the Total Station. The horizon line coordinates were surveyed and stored.

5.6. Surveying equipment used:

Total Station - GeoMax Zoom 90 Robotic total station with reflectorless measurements up to 1,000 metres and 3mm + 2ppm distance measuring accuracy.

GPS / GNSS System - GeoMax Zenith 40 GNSS receiver

5.7. Surveying equipment allows the camera location and fixed target points in the view to be calculated down to centimetre accuracy. By correctly matching the 3D model camera position and geometry of the view to the original photograph using pixel level data, highly accurate, survey-verified visualisations are produced (LI 11.4).

5.8. Processed Data Delivery:

Coordinate and level data in Excel file format DWG and JPG files detailing the observed points and the horizon line.



fig 3a AutoCAD DWG showing marked up surveyed context points

Project name: Date:

Job number: View reference:

Surveyor name:

		OS Grid Co-ordinates			
	Reference	Easting	Northing	Elevation	Accuracy (A-D)
Camera Position	V01	518269.327	169202.138	9.229	A
Surveyor Viewpoint 1	1	518276.699	169202.461	9.179	A
Surveyor Viewpoint 2	2	518276.253	169200.296	9.200	A
Surveyor Viewpoint 3	3	518275.231	169198.712	9.188	A
Surveyor Viewpoint 4	4	518282.839	169207.902	11.948	A
Surveyor Viewpoint 5	5	518301.714	169208.573	12.973	A
Surveyor Viewpoint 6	6	518301.453	169210.951	11.432	A
Surveyor Viewpoint 7	7	518301.535	169210.820	16.281	A
Surveyor Viewpoint 8	8	518302.117	169206.368	16.274	A
Surveyor Viewpoint 9	9	518302.545	169204.062	13.226	A
Surveyor Viewpoint 10	10	518295.312	169194.553	11.887	A
Surveyor Viewpoint 11	11	518299.757	169191.806	14.729	A
Surveyor Viewpoint 12	12	518343.529	169198.856	17.106	A
Surveyor Viewpoint 13	13	518302.383	169205.329	13.222	A
Surveyor Viewpoint 14	14	518279.094	169199.263	9.350	A
Surveyor Viewpoint 15	15	518302.517	169209.525	21.863	A
Surveyor Viewpoint 16	16	518302.730	169207.749	21.860	A
Surveyor Viewpoint 17	17	518310.296	169200.007	12.299	A
Surveyor Viewpoint 18	18	518310.553	169198.038	12.290	A
Surveyor Viewpoint 19	19	518301.549	169209.974	12.320	A
Surveyor Viewpoint 20	20	518302.369	169204.892	14.354	A
Surveyor Viewpoint 21	21	518300.161	169191.296	13.508	A
Surveyor Viewpoint 22	22	518290.014	169206.632	9.518	A
Surveyor Viewpoint 23	23	518286.150	169194.209	9.478	A
Surveyor Viewpoint 24	24	518302.376	169205.333	13.222	A
Surveyor Viewpoint 25	25	518301.270	169183.666	12.788	A

Class A <0.05m Class C <0.30m

fig 3b Survey coordinates supplied as an Excel file

fig 3c The total station in position

Accurate Visual Representation - Surveyed Viewpoints

Project name: **Date:**

Job number: **View reference:**

Surveyor name:

		OS Grid Co-ordinates			
	Reference	Easting	Northing	Elevation	Accuracy (A-D)
Camera Position	V3	528673.768	181155.202	24.352	A





Notes:
Bearing of image centre (approx.) = **120° 00' 00"**

6. Digital Images and Colour Correction

6.1. The digital images supplied by the photographer were saved as Photoshop PSD/TIFF/JPG files for use in the verification process.

6.2. Using the surveyed horizon points as a guide, each image is checked and rotated, if necessary, to ensure that the horizon line on the photograph is level, based upon the information received from the surveying team.

6.3. Any incorrect colour 'casts' are adjusted to match the original processed image. Similarly the brightness/contrast ratios of the image are corrected to match the original image (fig. 4b).

6.4. In professional architectural photography, having the camera pointing 'horizontally' (parallel with the ground) is desirable to ensure that vertical elements of the photographed scene remain perpendicular to the horizon. In reality the eye and brain compensate for non-perpendicular verticals and it is desirable to replicate this with photography. The tripods used by professional architectural photographers have built-in spirit level 'bubbles' to assist the photographer in keeping the vertical building elements 'vertical'.

6.5. Following from 6.3 above, the cameras used by professional architectural photographers have the ability to 'shift' the camera back upwards which removes the 'static' nature of having the horizon midway along the vertical dimension of the photograph (as opposed to a standard 35mm camera) and allows for the inclusion of more sky over immediate foreground. This is standard practice within architectural photography and more realistically reflects the viewers experience on site.

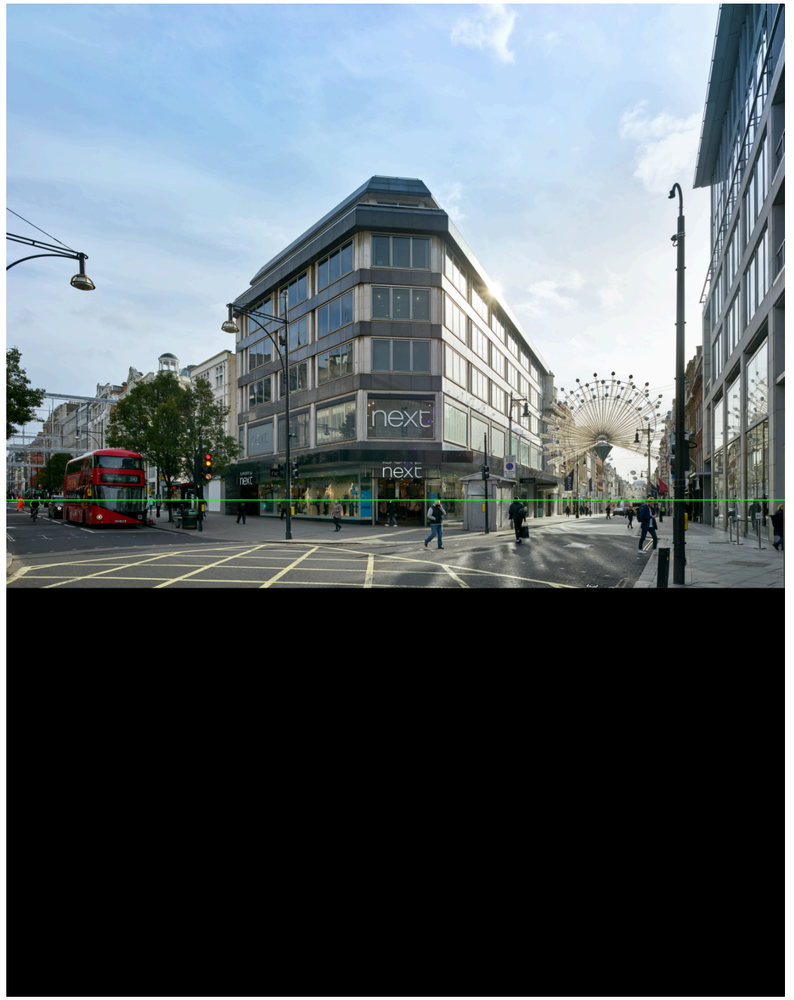
6.6. As noted within Appendix 13 of the LI, the tilt shift lens is increasingly being used in architectural photography in urban locations. It can also be employed for taking photographs up or down slope. If the verticality of a proposed building is not picked up using the standard lens, then the tilt shift can be employed.

6.7. The 'virtual' cameras in proprietary 3D software typically do not have this 'shift-negative' feature and so their horizon line will always bisect the vertical dimension of the view when the virtual camera's view cone is positioned parallel to the ground plane. Consequently the digital image is further resized to ensure that the surveyed horizon line bisects the background image in the vertical dimension. (fig 4b).



fig 4a High resolution image as supplied before colour correction

fig 4b High resolution image after colour correction. The image has been rotated and resized to ensure that the surveyed horizon line is level and bisects the vertical dimension equally



7. The 3D Model and View Verification Process

7.1. All drawn and digital information regarding the proposed development was supplied to Hayes Davidson in digital format by Adjaye Associates.

7.2. At each view position a virtual camera was set up in the 3D software 3DS Max using the coordinates provided by the surveyor. The coordinates of the surveyed verification points were used to create accurate reference points in 3D space. The scene was verified by aligning the surveyed points between the data scene and the photograph (fig. 5a). This alignment is then quality checked by a select pool of experienced partners. Where improvements are deemed necessary, the alignment is amended and re-checked until the required accuracy is achieved.

7.3. Hayes Davidson used a 3D model of the proposed development supplied by Adjaye Associates. This computer model was precisely aligned to the surveyed coordinate system and the aligned scene using information provided by Adjaye Associates. Hayes Davidson received confirmation from Adjaye Associates that the position and height of the proposed development was correct to their designs (fig. 5b).

7.4. Where multiple images were required to create the wider scene, Hayes Davidson used an in-house technique called Multi-Panel. Each individual image was aligned using the process above, then the virtual cameras are merged into a single scene in the 3D software, thus creating a merged wide image. This technique reduces the distortion caused by using wider lenses. Photographs for Multi-Panel images are taken in a clockwise direction (left-to-right), avoiding movement in the scene between the adjacent images where possible.

7.5. Using the verified camera described previously, the computer produces an image, known as a render, of the proposed building using the geometry specified. This render is then utilised within compositing software to create the varying image styles (fig. 5c).



fig 5a Contextual survey points matched to the scene



fig 5b The 3D model placed into the scene

fig 5c The wireline image



8. Image Production

8.1. Buildings with a similar orientation to the proposed building within the scene can be used as a reference to obtain valuable visual clues as to how the light would react with the proposed building.

8.2. Hayes Davidson analysed the scene and assessed tonal values. We used the computer to take multiple digital samples of values for hue, saturation and brightness from a number of scenes in the photography. From this an analysis and assessment of the likely tonal and colour values in the scene was made.

8.3. The computer generated image of the proposals is combined with the background photography using proprietary digital compositing software.

Notes

8.4. Subject to accurate survey information, the position and scale of a building in a scene can be verified mathematically. Whilst position, height and scale will be objectively accurate, subjective judgement must be used when lighting is being assessed and therefore a definitive and objectively verified agreement on lighting is not possible.

8.5. The computer can accurately assess the relative contrast between the faces of a building at a particular time. The computer can also render approximate material definitions. However, not every aspect of what is seen visually on screen is able to be simulated using an automatic or wholly objective process. Reflected light, local lighting conditions, detailed material definitions, climatic conditions including moisture content of the air both across the scene as a whole and locally cannot be accurately assessed or simulated by current computer technology.

8.6. Hayes Davidson therefore turn to the scene for visual clues in order to set the render of the proposed development into the photograph.

Image Scaling

8.7. The objective of Type 4 visualisation is to present a printed image which gives a realistic impression of scale and detail. Where scale-verifiable output is not possible (LI Appendix 1.1.7), verified photomontages can still be regarded as Type 4, provided they are supported by quantifiable data and a technical methodology, and agreed by the competent authority.



fig 6a The scene with the features in the foreground marked so that the proposed development can be positioned



fig 6b The rendered model of the development accurately positioned

fig 6c The completed photomontage (AVR3)



Technical table

View No.	Location	Summer / Winter	Rendered / Wireline	Camera / Tripod height (m)	Number of panels	Horizontal field of view per panel (degrees)	Vertical field of view per panel (degrees)	Lens used (mm)	Date	Time	Easting (m)	Northing (m)	Elevation (mAOD)	Eye Level (mAOD)	Distance from Scheme (m)	Bearing (degrees)
01	LVMF 18A.2 – Westminster Bridge Upstream	Summer	Wireline	1.6	1	70.1	55.5	35	28/09/24	08:47	530463.188	179650.109	10.509	12.109	351.404	207.435
02	LVMF 18A.1 – Westminster Bridge Upstream	Summer	Wireline	1.6	1	70.1	55.5	35	28/09/24	09:23	530592.062	179640.812	8.527	10.127	418.373	224.875
03	LVMF 22A.3 – Albert Embankment opposite the Palace of Westminster	Summer	Wireline	1.6	1	70.1	55.5	35	28/09/24	09:46	530584.125	179609.688	4.463	6.063	390.578	227.383
04	LVMF 22A.2 – Albert Embankment opposite the Palace of Westminster	Summer	Wireline	1.6	1	70.1	55.5	35	28/09/24	10:26	530570.25	179463.625	4.487	6.087	294.005	246.909
05	Local View - River Thames	Summer	Render	1.6	3	70.1	55.5	35	28/09/24	12:33	530554.188	179290.453	4.528	6.128	252.365	282.375
06	LVMF 22A.1 – Albert Embankment opposite the Palace of Westminster	Summer	Render	1.6	3	70.1	55.5	35	28/09/24	13:18	530538.375	179140.734	4.547	6.147	250.754	294.116
16	TC6A	Summer	Render	1.6	1	70.1	55.5	35	30/10/25	09:52	530249.688	179285.969	4.741	6.341	0	168.222
18	TC3A	Summer	Render	1.6	1	70.1	55.5	35	2/11/25	08:09	530281.938	179162.234	4.51	6.11	0	219.697
18 (Night)	TC3A (Night)	Summer	Render	1.6	1	70.1	55.5	35	30/10/25	17:11	530281.938	179162.234	4.51	6.11	0	219.597
21	TC6C	Summer	Render	1.6	1	70.1	55.5	35	30/10/25	08:39	530224.812	179248.953	4.442	6.042	0	158.002
22	Victoria Tower Gardens	Summer	Render	1.6	1	70.1	55.5	35	30/10/25	10:49	530260	179099.469	4.751	6.351	0	357.821
22 (Night)	Victoria Tower Gardens (Night)	Summer	Render	1.6	1	70.1	55.5	35	30/10/25	17:12	530259.938	179099.469	4.751	6.351	0	358.441
23	Playground View (verified)	Summer	Render	1.6	1	70.1	55.5	35	30/10/25	09:15	530266.562	179019.375	4.792	6.392	0	357.781

HAYES DAVIDSON

Thank you

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