

United Kingdom Holocaust Memorial and Learning Centre
Victoria Tower Gardens, Westminster, London SW1P 3JU

**Independent Architecture, Heritage & Townscape Statement
Addendum, February 2026**

Tavernor Consultancy

**On Behalf of the Ministry of Housing, Communities and Local
Government**

Independent Architecture, Heritage & Townscape Statement

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1.0 Executive Summary

- 1.1 This Addendum Statement has been prepared by the Tavernor Consultancy. Robert Tavernor retired from the consultancy in December 2023. This statement has been prepared by Louise Newman, Director of the Tavernor Consultancy, based on the updated Design and Access Statement (DAS) provided by Adjaye Associates. It considers the quality and appropriateness of the current proposals in comparison to the previous design of the United Kingdom Holocaust Memorial and Learning Centre (UKHMLC) considered in the April 2021 Inspector's Report.
- 1.2 Adjaye Associates' DAS provides a comprehensive account of the context and design of the current proposal. The updates to the design relate to necessary compliance with various regulatory changes that have occurred since the submission of the application. The separate Heritage, Townscape and Visual Impact Assessment (HTVIA) Addendum by Montagu Evans demonstrates that the external appearance of the current proposal would not be altered in comparison to the previous design considered in the April 2021 Inspector's Report. In our view the minor changes that have occurred in the context of the site since the date of the April 2021 Inspector's Report would make no material change to the impact of the proposal on its townscape and historic context. This is supported by the conclusions of the Environmental Statement.
- 1.3 In summary, we find that the conclusions reached by Robert Tavernor in his 2018 Statement and 2019 Addendum Statement remain valid. The current proposal will result in an appropriate – indeed, world class – architectural and landscape intervention within the Grade II Registered Victoria Tower Gardens. It will enhance the Grade II Registered Victoria Tower Gardens, and the significance and Outstanding Universal value (OUV) of the Westminster World Heritage Site (WHS) and the significance of other relevant heritage assets will be left unharmed. the current design. The current proposal will not materially alter the previous design for the UKHMLC, and the Tavernor Consultancy remains fully supportive.

2.0 Introduction

- 2.1 The Tavernor Consultancy provides consultancy advice on architecture, urban design, townscape and built heritage. Our advice always focusses on achieving the highest architectural quality outcome from the design teams we advise as a specific response to the significance and visual sensitivities of the historic environment to which a site relates. While Robert Tavernor retired from the consultancy in December 2023, our approach to townscape and heritage consultancy continues to draw on the principles and methodologies he established through his broad expertise as an architectural historian, architect and urbanist.
- 2.2 Robert Tavernor first reviewed the design of the UK Holocaust Memorial and Learning Centre (UKHMLC) was at the competition stage in January 2017. On winning the design competition, the Tavernor Consultancy was appointed by Adjaye Associates to provide Architecture, Heritage & Townscape advice. His advice was provided independently of the HTVIA, which was provided for the relevant EIA chapter by Montagu Evans.
- 2.3 Robert Tavernor's 2018 Statement formed part of the architects' Design and Access Statement (DAS) submitted in support of the planning application in 2019. His Addendum Statement was written in response to design changes made subsequently by Adjaye Associates, which retained the fundamental approach of their 2018 masterplan. The principal changes of the 2019 Addendum related to the Entrance Pavilion and associated Memorial Courtyard. In his Addendum Statement Robert Tavernor concluded that the amended design would result in an appropriate architectural and landscape intervention within the Grade II Registered Victoria Tower Gardens. He also asserted that the proposal would enhance and not harm the character and setting of the Palace of Westminster within the WHS or Victoria Tower Gardens and would not harm other relevant heritage assets.
- 2.4 This addendum statement has been prepared by Louise Newman, Director of the Tavernor Consultancy. It is based on the updated DAS prepared by Adjaye Associates, the updated HTVIA prepared by Montagu Evans as part of the ES, our knowledge of the site and its context and our extensive experience gained from advising on major developments in London. It considers the quality and appropriateness of the current proposals in comparison to the design of the proposals reported in the Inspector's Report in April 2021.

- 2.5 Adjaye Associates' preceding DAS provides a comprehensive account of the context and design of the proposal. A separate HTVIA Addendum by Montagu Evans provides a series of verified views that were previously modelled and assessed in the 2019 TVIA, now updated to show the current design in updated photography.

3.0 Changes to the Context

- 3.1 The Grade II* listed Buxton Memorial Fountain underwent repair during 2025 to refresh and enhance its appearance and safeguard the original materials; the renovation works are now complete. This repair work has not altered the contribution of setting to the significance of the memorial and its relationship to the proposal remains unaltered.
- 3.2 Repairs have also been carried out to the unlisted early 20th century Spicer Memorial at the southern end of the Gardens. This repair work has not altered the contribution of setting to the significance of the memorial and its relationship to the proposal remains unaltered.
- 3.3 Temporary scaffolding on parts of the Palace of Westminster, shown in some of the 2018 and 2019 images, has been removed. The repair of the Victoria Tower, from September 2025, will result in temporary scaffolding now being erected on this part of the Palace of Westminster, with repairs scheduled for completion in 2031. The presence of temporary scaffolding on the Grade I listed Palace of Westminster does not alter the contribution of setting to its significance or to the OUV of the Westminster WHS. The relationship of the Palace of Westminster to the proposal would remain unaltered.
- 3.4 Works to replace the roundabout at the Westminster end of Lambeth Bridge with traffic lights, and associated highways and public realm works to Lambeth Bridge and Millbank, are in progress. The works, which also include repairs to the Grade II listed Lambeth Bridge, are due for completion by summer 2026. This change to the modern highway configuration and appearance to the north and west of Victoria Tower Gardens does not materially alter the historic context of the site.
- 3.5 The redevelopment of No.7 Millbank to the north of the Gardens is ongoing and scheduled for completion in January 2027. The original 1913 Portland stone facades of the building will be reused in its nine-storey replacement by Make Architects.

- 3.6 The minor changes in the townscape and historic context of the site of the UKHMLC would not alter the impact of the current proposal on the historic environment in its context in comparison to that considered by the Inspector in his April 2021 Report.

4.0 Relevant Aspects of the Current Design

- 4.1 The updates to Adjaye Associates' DAS in comparison to the design considered in the April 2021 Inspector's Report, relate to necessary compliance with various regulatory changes that have occurred since 2021, including accessibility and fire safety.
- 4.2 As set out in Section 3 of this Addendum Statement, there have been some minor changes in the close context around the site but these would not materially alter its townscape and historic character, and would not materially alter the character and quality of the settings, or the contribution of setting to the significance, of any of the heritage assets within the local area.
- 4.3 As demonstrated by the updated verified views in Montagu Evans' HTVIA Addendum the current design would not alter the external appearance of the proposal in comparison to the design considered in the April 2021 Inspector's Report.
- 4.4 The impact of the 2026 proposal for the UKHMLC on its townscape and historic context will not alter in comparison to the design considered in the April 2021 Inspector's Report.

5.0 Conclusions

5.1 The scope of this 2026 Addendum Statement is to consider the quality and appropriateness of the proposed changes to the design in comparison to that considered in the April 2021 Inspector's Report. We confirm that we have reviewed the relevant documentation being submitted by the design and planning teams as part of the planning application.

5.2 The 2026 proposal will not materially alter the design considered in the April 2021 Inspector's Report. We therefore find that the conclusions reached by Robert Tavernor in his 2018 Statement and his Addendum Statement remain valid:

- The proposals will have a negligible or minor impact on key views outside Victoria Tower Gardens, with some minor visibility – particularly in relation to the proposed visitor entrance along Millbank adjacent to the western boundary of the Site.
- Within the Gardens the proposals will enhance views south from its wider northern end: the lawn will tilt up and away from the viewer and will provide the narrowing Gardens with a powerful new landscape, enhancing the setting of the adjacent Buxton Memorial bordered by the existing mature trees: the visible tops of the bronze Memorial Fins will provide a subtle visual conclusion to the lawn and their coloration and articulation will relate positively to the trees and Buxton Memorial.
- The proposed playground and café beyond the raised lawn will be hidden from view when standing at the northern end of the Gardens and from within the Parliamentary Education Centre. As will the increased number and activity of visitors as they converge on the proposed Entrance Pavilion and make their way through the gently sloping Memorial Courtyard towards and between the bronze Memorial Fins down into the Learning Centre concealed below ground.
- Approaching Millbank from Lambeth Bridge the mature trees will continue to dominate and largely shroud Victoria Tower Gardens and the rich visual backdrop of the Palace of Westminster of the WHS will continue to provide the principal focus of views – along the river frontage and along its skyline silhouette. There will be glimpses between the mature trees bordering the Gardens of the proposed structures within – especially the café, Entrance Pavilion and Memorial Fins – each with their own distinct shape and character, and with the bronze Fins also drawing the gaze due their coloration. They will serve to provide the interior of the Gardens with visual depth and interest for passers-by and passers-through, as well as

providing a visual structure and hierarchy, aiding way-finding for visitors to the UKHMLC.

- The southern end of Victoria Tower Gardens will be provided with a new and powerful character and sense of place, which will be very specific to that end of the Gardens. The majority of the Gardens will have a very different character, distinctly separate from the southern end. Here, where the Gardens are their widest a carpet of grass will be maintained and subtly sloped above the proposed Learning Centre and landscaped with meandering paths. The proposed raised grass mound will provide visitors with a new viewing area where they can pause and appreciate the south elevation of the Palace of Westminster beyond the Parliamentary Education Centre at its base. The Grade II Registered Victoria Tower Gardens and the setting of the WHS will be enhanced and not harmed.
- The settings of the existing memorials in the Gardens will also be respected and enhanced. At the northern end, the settings of the Emmeline Pankhurst Memorial by the northwest entrance to the Gardens, and Rodin's 'Burghers of Calais' located centrally adjacent to the Parliamentary Education Centre will remain unchanged. At the southern end, the Spicer Memorial will be acknowledged by an embracing curve of the northern boundary of the proposed Playground and will have more prominence as seen by visitors entering and exiting the proposed Entrance Pavilion of the UKHMLC. The Buxton Memorial will remain visible outside the Gardens when moving east from Smith Square down Dean Stanley Street towards Millbank and the Gardens – the Memorial Fins to its right will accentuate its visibility without detracting from its setting. In views from the north of the Gardens looking south the Buxton Memorial will be seen as integral to the proposed landscape layout, and it will mark the threshold between the larger open landscape of the majority of the Gardens closest to the WHS, and the UKHMLC entrance and Playground in the more contained area to the south.

5.3 In terms of its impact on the townscape and historic context of the site, the 2026 proposal for the UKHMLC will not materially alter the design considered in the April 2021 Inspector's Report. As concluded by Robert Tavernor's 2018 Statement and 2019 Addendum Statement, our view is that the updated design will result in an appropriate – indeed, world class – architectural and landscape intervention within the Grade II Registered Victoria Tower Gardens. It will enhance the Grade II Registered Victoria Tower Gardens. The significance and OUV of the WHS and the significance of relevant heritage assets will not be harmed. The Tavernor Consultancy remains fully supportive.