

**United Kingdom Holocaust Memorial  
and Learning Centre**

Environmental Statement (Volume 3)  
Built Heritage, Townscape and Visual Impact Assessment  
December 2018

The Secretary of State for Housing, Communities and Local Government



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## EXECUTIVE SUMMARY

This Chapter of the Environmental Statement (ES) assesses the Proposed Development of the United Kingdom Holocaust Memorial and Learning Centre and whether it has any effects on built heritage, townscape, and visual amenity. The impacts of the proposals on strategic views as defined in the London View Management Framework are also considered. This chapter has been prepared by Montagu Evans LLP on behalf of the Secretary of State for Housing, Communities and Local Government.

The purpose of this summary is to identify impacts of particular relevance to the decision-making process. The range of potential significant direct and indirect effects is described in detail, according to each topic, in the ES Chapter. The relevant sections of this Volume of the ES should be consulted for the full range of effects.

Our assessment has been undertaken by qualified professionals (MRTPI/IHBC) and informed by best practice guidance, including Historic England guidance on significance and setting, GLVIA 3, the Mayor's guidance on protecting the setting of World Heritage Sites, ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties and relevant Supplementary Planning Documents. In carrying out this appraisal we are mindful of the statutory considerations relating to the setting of listed buildings and development in a conservation area. **Section 2.0** describes this decision-making framework.

### The Proposed Development: UK Holocaust Memorial and Learning Centre

The proposals for the UK Holocaust Memorial and Learning Centre (UKHMLC) seek 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.

The development of the project began in 2015 with the establishment of the UK Holocaust Memorial Foundation Advisory Board. The design has been created by Adjaye Associates and Ron Arad Architects, who were selected through a competition-process judged by a panel comprising the Secretary of State for Communities and Local Government, the Mayor of London, the Chief Rabbi, and Holocaust Survivors.

Victoria Tower Gardens was selected as the correct location for its proximity to Parliament.

The location is significant for two reasons. Firstly, it will provide the context for visitors' examination of the British Government's response to the Holocaust, which supports the function as a Learning Centre. Secondly, the distinctive form of the memorial will serve as a poignant reminder of the importance of democratic government, at the seat of one of the world's oldest Parliamentary Democracies, and thus facilitate an ongoing dialogue concerning the role of the state not just in 20th century history, but in the evolving modern world. Parliament is part of a system of government which enshrines the rule of law; the murder of European Jews stands outside this political framework.

### Assessment Methodology

This HTVIA ES Chapter is designed to meet the terms of regulations and so assist the local planning authority in the determination of this application. The HTVIA is also there to inform statutory consultees, amenity societies, local groups and individuals affected by the proposals or with some interest in them. We have sought to prepare a document which addresses these different audiences. For the non-specialist reader, this executive summary is intended to highlight the most relevant impacts. The purpose of an ES is not to identify ALL of a proposal's impacts, just those which have a significant indirect or direct effect. What comprises a significant effect is a matter of judgment, but generally a significant effect will be one which is material to the exercise of planning judgment and hence planning decision making.

The process we have adopted in our volume follows technical and best practice guidance, as outlined in **Section 2.0 and 3.0** of this document. We have also had regard to statutory considerations and the policies of the development plan, which require or imply a particular methodology.

The process involves identification of what are known as 'receptors' in an analysis of what are termed 'baseline conditions'. A receptor is something or someone which experiences a proposed development in a way which matters to the planning process. The 'baseline' is, broadly, the existing situation taking into account certain consented schemes on a case by case basis made clear in the documentation.

Thus, in this volume, there are three baselines; Built Heritage, Townscape (defined in relation to areas of particular and identifiable character) and Visual. The latter category includes both incidental views, experienced by a user of an environment, and planned views, including those formally designated in the London View Management Framework (LVMF) (2012). Impacts on views can, for example, be ones which affect our ability to appreciate what is special about the historic environment, or the way in which people experience a scene. This form of assessment, it is accepted, concerns views from publicly accessible viewpoints, and not from private land or accommodation. Heritage setting impacts occur irrespective of public access. In this case, all of the heritage setting impacts affect publicly accessible views.

### Key Considerations

The salient consideration as applicable to this Volume is whether the Proposed Development will preserve or enhance the character and appearance of the surrounding area, including the contribution made by the Site to designated heritage assets and their settings, the functioning and use of the space, and the visual amenity of those experiencing views of the Site. In approaching our assessment of these impacts, we note that the scale of the proposals and the surrounding urban environment mean that the UKHMLC would only be experienced within a relatively contained area. We have paid particular regard to the impact of the proposals on the ability to appreciate the Outstanding Universal Value of the Westminster World Heritage Site (WWHS). Victoria Tower Gardens, the site for the memorial, is not in the WHS; the land is an important element in its setting, supporting its OUV.

Turning first to heritage matters, we have therefore focussed our assessment on those assets which are likely to experience a change as a result of the Proposed Development. These 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.

### Summary of Effects

In relation to the Westminster WHS, the salient consideration is whether the Proposed Development 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 on Heritage Impact Assessments for Cultural World Heritage Properties' (2011) and the Mayor's 'London World Heritage Sites – Guidance on Settings' SPG (2012). 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.

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.

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.

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.

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.

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.

The impact of the UKHMLC at night has also been considered. This is addressed in more detail in the Visual Impact Assessment at **Section 10.0**, 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.

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.

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.

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.

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.

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.

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.

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.

As discussed in detail at **Section 4.0**, 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.

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.

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. The effect of the Proposed Development on townscape character is discussed in more detail at **Section 8.0** and in the Design and Access Statement prepared by Adjaye Associates.

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.

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.

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 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.

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.

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.

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 focussed 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. Where these are relevant to our assessment, they are considered in full at **Section 9.0**.

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.

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.

### Conclusion

Thus, the conclusions of the HTVIA are summarised below.

First, in relation 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.

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.

In relation to heritage matters, there are some particular sensitive interactions with the Westminster WHS, the Outstanding Universal Value of which has been recognised through its UNESCO designation. The setting impacts on the WHS are confined to the south of the WHS, and our ability to admire and appreciate it, and its OUV, is not undermined and is certain respects enhanced by a memorial that reinforces certain aspects of the OUV. Views of Parliament from the southern part of the park are curtailed but replaced by new views of from an improved viewing area or experience. The Buxton memorial's setting is encroached upon but at the same time it is enhanced and a better scheme of interpretation implemented, giving it, overall, an improved profile and greater prominence.

With regard to the Victoria Tower Gardens RPG, the memorial will change the character of some of the land within the park from open lawn to a landscaped memorial with hard and soft landscaping. The memorial itself is a high quality, attractive addition, and provides the opportunity to enhance the heritage value of the park by contributing to its collection of historically and architecturally significant monuments. The trees within the park are to be preserved, which will preserve an important element in views towards the park, and in defining its character within. The space is already widely used, by visitors, workers and residents. The management regime integral to the proposals will help to maintain the character of the area. Impacts are offset by benefits to the cultural value of these several assets, and our ability to appreciate that special interest is enhanced by the design and purpose of the new memorial.

Given the limited area of impact, and the high quality of the Proposed Development, we conclude that any harm arising to the RPG is very limited, and less than substantial in terms of the NPPF, and would have to be balanced against the heritage benefits outlined above.

The proposals will, in particular, be seen in the setting of the grade II\* Buxton Memorial Fountain, and whilst the monument will screen some views towards the monument, these are of no particular significance, and are compensated by improvement of its immediate setting with a designed space from which to appreciate its significance and form. Similarly, any harm to the Memorial is very limited, affecting its appreciation from incidental points, and stands to be weighed against the improvements proposed to its setting provided through the enhanced interpretation.

Finally is the impact on the Westminster Abbey and Parliament Square Conservation Area, within which we judge that the memorial would be an appropriate and apposite addition, which would contribute to the character and appearance of the Conservation Area as a whole. Increased visitors would not change or undermine the way the area appears or its character, though the position of the memorial would naturally change the way in which part of it functions.

The children's playground at the southern end of the park is to be re-landscaped with new play equipment, which will preserve its use.

So, and in summary, there are two potential adverse impacts requiring consideration in particular; those to the character of the park, and the setting of the Buxton Memorial Fountain.

Overall, taking a broad view of all the topics, we conclude that the Proposed Development comprises a well-considered and high quality memorial, which will be a positive addition to the Victoria Tower Gardens. Whilst the Memorial leads to some heritage and visual impacts, the Proposed Development is, according to our professional judgment, an entirely appropriate addition which responds sensitively to both its material and context. The scale of the Memorial is entirely commensurate with its subject, and its form and appearance are appropriate to its location and context.

// NATIONAL HOLOCAUST MEMORIAL



Introduction

## 1.0 INTRODUCTION

- 1.1 Montagu Evans have been instructed by the Secretary of State for Housing, Communities and Local Government (hereby referred to as the 'Applicant') to provide consultancy services and produce this Heritage, Townscape and Visual Assessment (the 'HTVIA') in support of proposals which are subject to an application for Planning Permission for a new Holocaust Memorial and Learning Centre within the Victoria Tower Gardens, Westminster (the 'Site').
- 1.2 This section of the Environmental Statement ('ES') reports the likely significant effects of the Proposed Development on the Site and surrounding area in terms of heritage, townscape and visual receptors. It considers the potential for the Proposed Development to affect designated and non-designated heritage assets, the surrounding townscape and visual aspects of the Site, its existing and future surroundings, as well as the capacity of identified existing and future sensitive receptors to accommodate the likely change. Where appropriate it also identifies proposed mitigation measures to prevent, minimise or control likely negative effects arising from the Proposed Development and the subsequent anticipated residual effects.
- 1.3 This section (and its associated figures and appendices) should be read together with the Introductory Chapters of this ES (Sections 1 – 5, Vol 2).
- 1.4 The Site is located in the City of Westminster (the 'Council'). The Site is described in detail at **Section 4.0** and also within the Design and Access Statement prepared by Adjaye Associates. **Figure 1.1** outlines the boundary of the Site. An aerial view of the Site is provided at **Figure 1.2**.
- 1.5 The existing Site comprises the publically accessible grounds of the grade II Registered Park and Garden (RPG) Victoria Tower Gardens.
- 1.6 A description of the proposals (the 'Proposed Development') is provided within the Planning Statement prepared by DP9. The Proposed Development may, however, be summarised as:

*"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."*

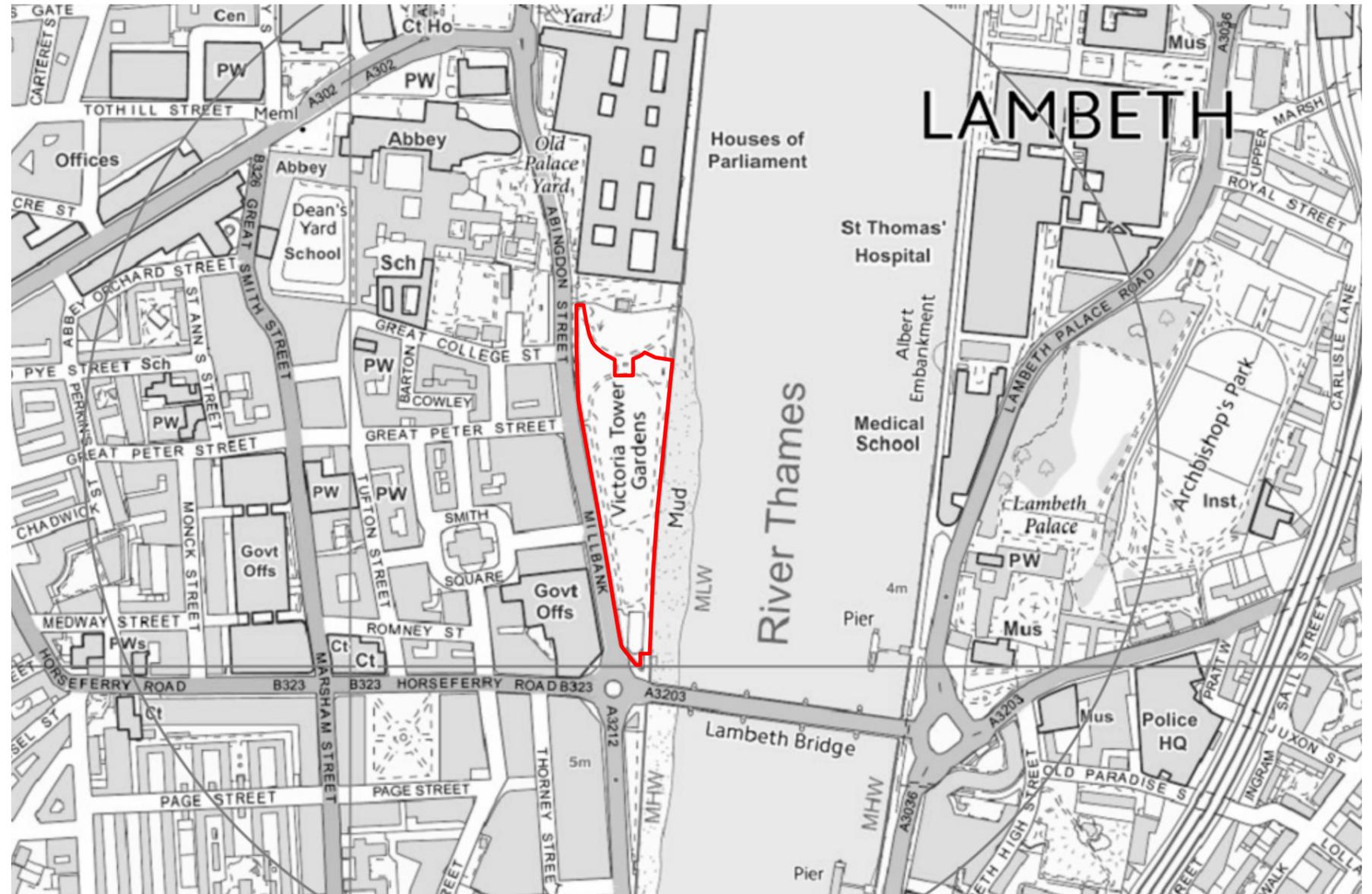


Figure 1.1 Site Plan

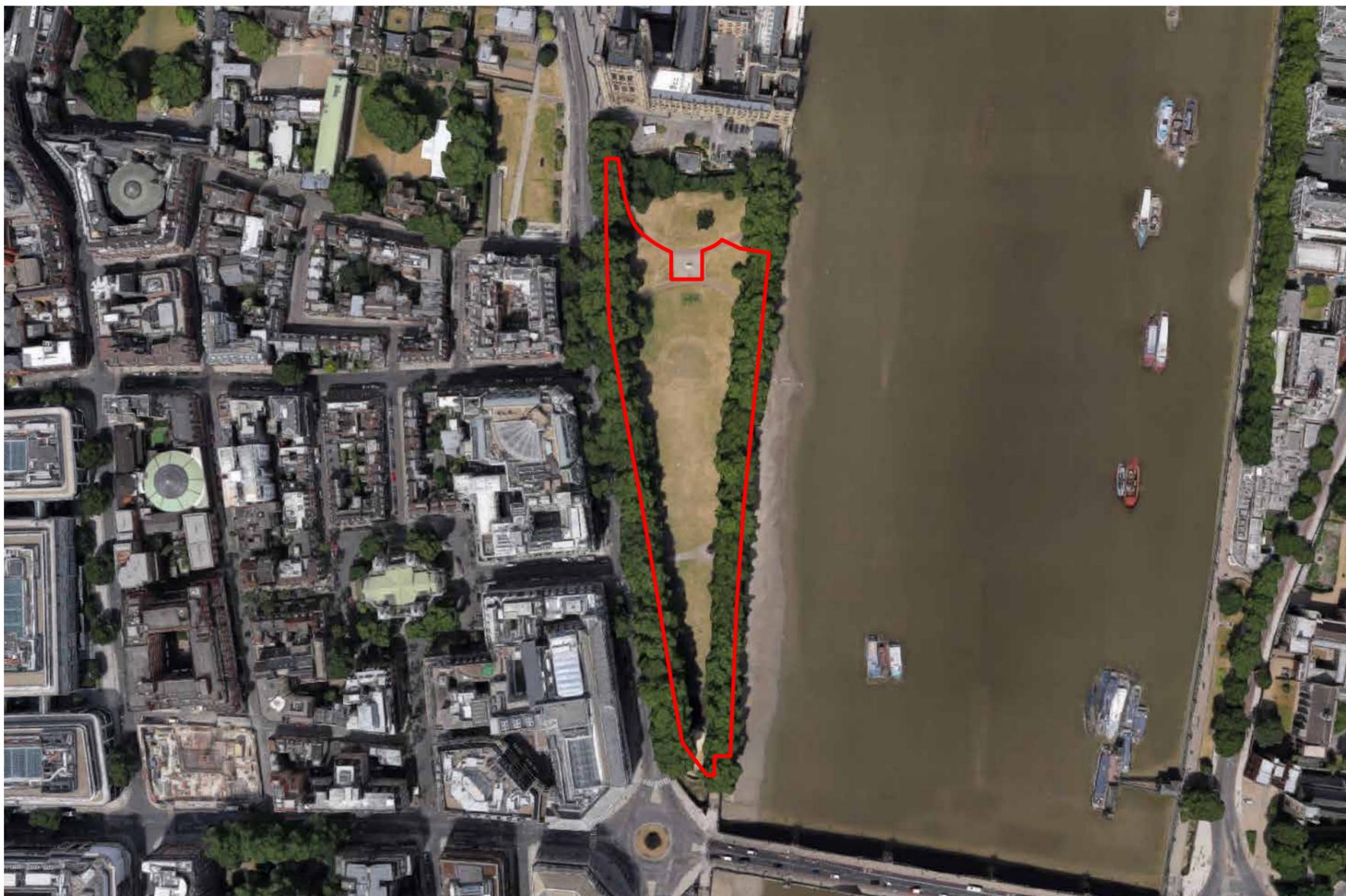


Figure 1.2 Aerial View. Source: Google (base map)

- 1.7 The design of the Proposed Development has evolved over two years, including a two stage international design competition that began on 14 September 2016. The new National Memorial to the Holocaust, a Learning Centre and a number of wider education and commemoration projects including recording the testimony of Holocaust survivors, were originally recommended to the UK Government by the cross-party Holocaust Commission in January 2015, following extensive public consultation. The UK Holocaust Memorial Foundation (UKHMF) was subsequently set up by the government with cross party support in January 2015 to advise on the delivery of the recommendations made by the Prime Minister's Holocaust Commission (launched on Holocaust Memorial Day 2014): for a national memorial to the Holocaust, a world-class learning centre, an endowment fund to advance Holocaust education and an urgent programme to record British Holocaust survivor and camp liberator testimony. This included an extensive analysis of potential locations and consultation with Westminster City Council and other stakeholders.
- 1.8 The two-stage international design competition was run in accordance with EU procurement guidelines and the Public Contracts Regulations 2015 and was advertised in the Official Journal of the European Union (OJEU). The competition's first stage invited Expressions of Interest from and from the almost 100 Expressions of Interest submitted, a shortlist of ten was selected to proceed to the competition's second stage. An exhibition of the finalists' concept designs was held in central London and locations around the UK from January 2017. The design competition jury met in September 2017 to interview the shortlisted candidates, and unanimously selected the team led by Adjaye Associates as the winner of the competition.
- 1.9 The competition winning design has been developed with specialist heritage, townscape and visual advice and through extensive consultation with key stakeholders including Westminster City Council, the Greater London Authority (GLA) and Historic England.

### Purpose of the Report

- 1.10 The HTVIA provides an assessment of the impact of the Proposed Development on heritage, townscape and visual receptors. The HTVIA forms a Chapter within Volume 2 of the Environmental Statement (the 'ES').
- 1.11 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).
- 1.12 The townscape assessment will consider the Proposed Development within its urban context, 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.
- 1.13 In broad terms, the heritage and townscape matters considered in this assessment break down into the following categories:
1. The effects of the Proposed Development upon Victoria Tower Gardens RPG and the Westminster Abbey and Parliament Square Conservation Area;
  2. The effects on the setting and features of architectural and/or historic interest of the grade II\* listed Buxton Memorial Fountain;
  3. The effects of the Proposed Development upon the setting of identified heritage assets and features of architectural and/or historic interest and the consequent impact on their significance;
  4. The effects of the Proposed Development on the heritage value of identified conservation areas; and
  5. The effects of the Proposed Development on the heritage value of the Westminster and Westminster Abbey including St Margaret's Church World Heritage Site and its setting; and
  6. The effects of the Proposed Development upon the setting Houses of Parliament and the Palace of Westminster, itself a grade I listed building.

- 1.14 The visual assessment has considered the impact of the Proposed Development upon visual receptors, informed by verified accurate visual representations (see assessment methodology section) prepared by Hayes Davidson and other supporting visual material including visualisations of the Proposed Illumination prepared by Adjaye Associates. Viewpoint locations have been determined through pre-application consultation and an appraisal of the existing Site and surroundings and relevant policy designations.
- 1.15 The assessment reviews the relevant statutory and planning policy context in relation to heritage, townscape and visual impacts, and explains the assessment methodology. It then describes the current and predicted future baseline conditions at the Site and its surrounds; identifies potential impacts; discusses the mitigation measures integral to the Proposed Development that would reduce or offset the magnitude of potential impacts; and finally, assesses the significance of residual effects. Consideration is given to direct, indirect and cumulative impacts during the installation works, and once the Proposed Development has been completed.
- 1.16 The assessment has been prepared in accordance with best practice and in line with the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2017 ('the EIA Regulations') as amended. A non-technical summary is provided with reference to the legislative and planning policy framework. The best practice includes the London View Management Framework, Supplementary Planning Document (SPD) to the London Plan. A summary of the legislative and planning policy framework is provided in **Section 3**.
- 1.17 This assessment should be read in conjunction with the following technical appendices:
- **Technical Appendix 1.1: Maps:**
    - **Figure 1.1.2:** Heritage Asset Plan; and
    - **Figure 1.1.3:** Townscape Character Area Plan; and
    - **Figure 1.1.4:** View Location Plan
  - **Technical Appendix 1.2: Accurate Visual Representations Methodology**
  - **Technical Appendix 1.3: Built Heritage Baseline**

### Accurate Visual Representations

- 1.18 The assessment is supported by accurate visual representations (AVRs) of the Proposed Development from 22 viewpoints. The AVRs have informed this assessment, as have the Design and Access Statement, submitted plans and relevant supporting application documents. As detailed below, the view locations have been discussed and agreed with the Council and Historic England during the pre-application stage.
- 1.19 The view locations and each viewpoint is reproduced at **Section 9** and **Technical Appendix 1.2** 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.
- 1.20 In addition, detailed information on the AVR production methodology is provided in **Technical Appendix 1.2** to this Chapter. The methodology is in accordance with Guidelines for Landscape and Visual Impact Assessment (GLVIA3) and Photography and photomontage in landscape and visual impact assessment Advice Note 01/11, which is considered best practice.
- ### Pre-Application Consultation
- 1.21 The design of the Proposed Development has evolved through over two years of pre-application consultation including with Westminster City Council, the Greater London Authority (GLA), Historic England (HE) and other key stakeholders and the local community.
- 1.22 There has been a comprehensive and productive working relationship with Westminster City Council, and the design team have responded to various comments constructively. Pre-application presentations to the GLA has led to its support for the proposals. Similarly pre-application consultation with Historic England, including presentation to the London Advisory Committee, has led to their broad support to the principle of the project.
- 1.23 This HTVIA has been completed in accordance with the EIA Scoping Report submitted to the local planning authority in July 2017, and takes into account the subsequent Scoping Opinion received from the local planning authorities.

2.0

// NATIONAL HOLOCAUST MEMORIAL



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.

// NATIONAL HOLOCAUST MEMORIAL



Legislation and Planning Policy

### 3.0 LEGISLATION AND PLANNING POLICY

3.1 The following section sets out the planning policy context for the site and for the context of the assessment process.

#### Legislation

##### Planning (Listed Buildings and Conservation Areas) Act 1990

3.2 Legislation relating to the protection of the historic environment is set out in the Planning (Listed Buildings and Conservation Areas) Act 1990. This requires local planning authorities to have special regard to the desirability of preserving the special interest of listed buildings, conservation areas and their settings.

3.3 The Application Site does not include any statutorily listed buildings, and is located within the Westminster Abbey and Parliament Square Conservation Area.

3.4 With respect to this application, the applicable statutory provisions are:

#### ■ Section 66(1):

*"In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features or special architectural or historic interest which it possesses."*

#### ■ Section 72(1):

*"With respect to any buildings or other land in a conservation area, of any [functions under or by virtue of] any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."*

3.5 In preparing our analysis we are mindful of the considerable weight attached to the preservation or enhancement of the setting of heritage assets, which was clarified by the Court of Appeal judgment in *Barnwell Manor Wind Energy vs. East Northamptonshire et al* [2014]. The Court held that *"to make an assessment of the indirect impact of development or change upon an asset it is first necessary to make a judgment about the contribution made by its setting"*. In turn, the decision ruled 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"*. See below from paragraph 3.4.0 *analysis of the relevant NPPF and PPG provisions*.

3.6 Improvements to setting, enhancing the significance of an asset or our ability to appreciate that, attract great weight in the planning decision making process under the terms of paragraph 132 of the NPPF.

3.7 *Jones v. Mordue* [2015] confirmed that, generally, if a decision maker applies his or herself to the considerations at paragraphs 132-134 of the (2012) NPPF, then (absent some contrary indication) s/he has discharged the statutory duties at sections 66 and 72 of the 1990 Act.

3.8 *Palmer v Herefordshire Council & ANR* [2016] confirmed that where a development would affect a listed building or its setting in different ways, some positive and some negative, the decision maker may legitimately conclude that although each of the effects has an impact, the overall effect is taken on the basis of the development as a whole. On this basis, paragraph 133 or 134 of the (2012) NPPF would only be engaged where the harm is not outweighed by the heritage benefits delivered by a development.

3.9 There are often offered contrary interpretations, whereby 134 is always engaged in the case of any harm whatsoever. We do not understand that to be the correct approach. Rather the consideration, in instances of harm, should be whether there is any residual harm arising after mitigation through design.

#### Development Plan

3.10 Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 stipulates that where in making any determination under the Planning Acts, regard is to be had to the development plan, and the determination must be made in accordance with that plan unless material considerations indicate otherwise. The following documents form the statutory development plan.

##### London Plan (2016)

3.11 The London Plan is "the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years" (p.10). The policies pertinent to the assessment of heritage, townscape and visual impact are contained in Chapter 7 (London's Living Places and Spaces).

3.12 Policy 7.4 (Local Character) states that development should have regard to the form, function and structure of an area, place or street, and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.

3.13 It goes on to say in 7.4B that buildings, streets and open spaces should provide a high quality design that responds to the character and urban structure of the surrounding environment.

3.14 Policy 7.8 (Heritage Assets and Archaeology) advises that development affecting heritage assets and their setting should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

3.15 Policy 7.10 (World Heritage Sites) and the GLA's supplementary planning guidance on setting, state that development should conserve, promote and enhance the authenticity, integrity, significance and Outstanding Universal Value (OUV) of World Heritage Sites.

- 3.16 The London Views Management Framework (LVMF) is discussed at Policy 7.11. Development should, according to Policy, be assessed against the LVMF supplementary planning guidance (2012) if it falls within the foreground, middle ground or background or designated views. The designated views require a level of management appropriate to the potential impact on the viewer's ability to recognise and appreciate strategically important landmarks and World Heritage Sites.
- 3.17 Policy 7.12 (Implementing the London View Management Framework) states that development should not harm, and where possible should: *"make a positive contribution to the characteristics and composition of the strategic views and their landmark elements. It should also preserve or enhance the viewer's ability to recognise and appreciate strategically important landmarks in these views and, where appropriate, protect the silhouette of landmark elements of the World Heritage Sites as seen from designated viewing places."*
- 3.18 River Prospect views should be managed to ensure that the juxtaposition between elements, including the river frontages and key landmarks, can be appreciated in their wider context. Townscape and Linear views should be managed so that the ability to see specific buildings or groups of buildings, in conjunction with the surrounding environment, including distant buildings within views, is preserved.
- 3.19 Policy 7.29 (The River Thames) highlights that the River Thames is a strategically important and iconic feature of London. It notes how the river changes a great deal in its size and character as it flows through London, particularly given the twice daily changes brought by its tidal nature. Paragraph 7.88 states that:  
*"The central London stretches of the Thames are world famous locations, featuring well known landmarks and views. Many other stretches have important historic, cultural and natural connections. These aspects of the Thames should be protected."*
- 3.20 The application site is located within the Central Activities Zone (CAZ) and Policy 2.10 (Central Activities Zone – Strategic Priorities) states that a strategic priority for the CAZ is to:  
*"d. sustain and enhance the distinctive environment and heritage of the CAZ, recognising both its strategic components such as the River Thames, the Royal Parks, World Heritage Sites, designated views and more local features including the public realm and historic heritage, smaller open spaces and distinctive buildings through high quality design and urban management"*.
- 3.21 Policy 4.6 (Support for and Enhancement of Arts, Culture, Sports and Entertainment) states that the Mayor, boroughs and other stakeholders should support the continued success of London's arts and cultural enterprises, and the cultural, social and economic benefits that these offer residents, workers and visitors. The Mayor's Cultural Metropolis (GLA, 2010) seeks to maintain the capital's status as one of the greatest world cities for culture and creativity, and addresses the need to increase the provision of arts and culture facilities in outer London.  
**Westminster City Plan (2016)**
- 3.22 Westminster City Council adopted the latest version of Westminster's City Plan on 9th November 2016. A revised City Plan is presently undergoing review, with consultation due to close on 21st December 2018, and is included with Emerging Policy.
- 3.23 Policy S37 (Westminster's Blue Ribbon Network) is focussed on the River Thames and seeks to protect and enhance the character, appearance, heritage and landscape value of the Blue Ribbon Network and its setting. Developments along the Thames should demonstrate that they have particular reference to their riverside location and local architectural references, including long views of the riverside.
- 3.24 Policy S25 (Heritage) sets out the approach to conserving heritage in Westminster. It states that:  
*"Recognising Westminster's wider historic environment, its extensive heritage assets will be conserved, including its listed buildings, conservation areas, Westminster's World Heritage Site, its historic parks including five Royal Parks, squares, gardens and other open spaces, their settings, and its archaeological heritage. Historic and other important buildings should be upgraded sensitively, to improve their environmental performance and make them easily accessible"*.
- 3.25 Policy S26 (Views) states:  
*"The strategic views will be protected from inappropriate development, including any breaches of the viewing corridors. Similarly, local views, including those of metropolitan significance, will be protected from intrusive or insensitive development. Where important views are adversely affected by large scale development in other boroughs, the Council will raise formal objections. Westminster is not generally appropriate for tall buildings."*
- 3.26 Policy S28 (Design) outlines the Council's overarching strategy for promoting high quality design. It states that:  
*"Development must incorporate exemplary standards of sustainable and inclusive urban design and architecture. In the correct context, imaginative modern architecture is encouraged provided that it respects Westminster's heritage and local distinctiveness and enriches its world-class city environment."*

- 3.27 Policy S35 (Open Space) states that the Council will protect and enhance Westminster's open space network, by:
- “Protecting all open spaces, and their quality, heritage and ecological value, tranquillity and amenity;  
Mitigating additional pressure on open spaces by securing new improved public open space in new developments; space for children's active play, and seeking public access to private spaces; and  
Securing contributions to improving the quality, ecological value and accessibility of local public open spaces and delivering new open spaces from under-used land.”*
- Westminster's Unitary Development Plan (2007, saved policies 2010)**
- 3.28 Westminster's Unitary Development Plan (UDP) was adopted by the Council in January 2007, and a number of policies were 'saved' by the Secretary of State in January 2010.
- 3.29 Saved Policy DES9 seeks to preserve or enhance the character or appearance of conservation areas. It also includes provisions to consider the impact of proposals on the setting of conservation areas and states that development will not be permitted if it has a visibly adverse effect upon the recognised and recorded familiar views, into, out of, within or across the Conservation Area.
- 3.30 Listed buildings and the setting of listed buildings are considered by saved Policy DES10 (Listed Buildings) which seeks to preserve both listed buildings and the setting of listed buildings.
- 3.31 Saved Policy DES12 (Parks, Gardens and Squares) relates to development affecting the appearance and integrity of open spaces and their settings. Part B relates to development on or under open spaces, and states that:
- “Permission will not be given for development on or under those parks, landscaped spaces and public or private gardens, where the open spaces:*
- 1) form an important element in the townscape, part of a planned estate or street layout*
  - 2) are characteristic features of conservation areas*
  - 3) provide the setting of a listed building*
  - 4) are of significance ecological value.”*

- 3.32 Saved Policy DES1 (Principles of urban design and conservation) seeks to ensure the highest quality in the form of new development in order to preserve or enhance the townscape of Westminster. Of particular relevance, the policy states that development proposals should demonstrate how they have taken into account the following
- “1) architectural quality, local character and distinctiveness*
  - 2) the location and nature of existing and potential links to and through the site and to amenities beyond the site*
  - 3) townscape features within the site and features which border the site*
  - 4) local views through and within the site and landmark features visible in the vicinity of the site*
  - 5) accessibility, inclusive design and security measures*
  - 6) regard to the relevant urban design policies contained in this chapter*
  - 7) regard to supplementary design guidance produced by the City Council*
  - 8) waste storage and disposal*
  - 9) sustainable building principles in accordance with policy ENV1: Sustainable and resource- efficient buildings.”*
- 3.33 Saved Policy RIV1 (The design of development) requires proposals within the Thames Policy Area in Westminster to maintain or improve the appearance of the area, to be sensitive to setting of listed buildings and structures, and other prominent landmarks.
- 3.34 Saved Policy RIV2 (Views) states that development that would have a significant adverse effect on views from, of, or across the River Thames should be refused.

## Material Consideration

### National Planning Policy Framework (NPPF) 2018

- 3.35 Chapter 12 of the NPPF outlines the Government's policy regarding design. It emphasises that “good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people”.
- 3.36 Paragraph 127 states that design should:
- “a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
  - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
  - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
  - d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
  - e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
  - f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*
- 3.37 Paragraph 130 advises that planning decisions should:
- “Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents. Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development.”*

- 3.38 Paragraph 131 promotes sustainable development and appropriate design:  
*"In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings."*
- 3.39 Chapter 16 of the NPPF (paragraphs 184 to 202) sets out the Government's policies relating to the conservation and enhancement of the historic environment. The NPPF stresses that heritage assets are an irreplaceable resource that should be conserved in a manner appropriate to their significance (paragraph 184). The guidance continues to place the assessment of the significance of heritage assets and the effect of development on this at the heart of planning for the historic environment.
- 3.40 'Conservation' is defined in Annex 2 of the NPPF as "The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance." In this case, which involves an EIA assessment, we refer to 'significance' as 'heritage value' in order to minimise any potential confusion with the significance of an environmental effect.
- 3.41 The NPPF places considerable weight on understanding the 'significance' of designated and non-designated heritage assets and the contribution made by their setting as a basis for development control decisions. The requirement for an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting is set out at paragraph 189:  
*"local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance."*
- 3.42 The historical information set out in this ES Chapter provides such an understanding, proportionate to the significance of heritage assets and the impact of the proposals.
- 3.43 Paragraph 193 states that:  
*"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."*
- 3.44 Paragraphs 194 and 195 provide a definition and the approach to substantial harm. Paragraph 196 has regard to less than substantial harm. It states that:  
*"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."*
- 3.45 Paragraph 197 states that:  
*"The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset."*
- 3.46 Paragraph 200 of the NPPF states that local planning authorities should look for opportunities for new development within conservation areas and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.
- 3.47 The definition of the setting of a heritage asset in the annex of the NPPF is the "surroundings in which a heritage asset is experienced". Further, the extent of a setting "is not fixed and may change as the asset and its surroundings evolve". Setting is not itself a heritage asset but elements of a setting "may make a positive or negative contribution to the significance of an asset".
- National Planning Practice Guidance (online)**
- 3.48 The guidance for the application of the NPPF is provided by the PPG. This guidance was published as a web based resource on 6 March 2014. In preparing Local Plans and taking decisions, local planning authorities need to consider and have regard to planning practice guidance issued by the Government.
- 3.49 The guidance states that to support economic, social and environmental objectives, the following design issues should be considered:
- "local character (including landscape setting)
  - safe, connected and efficient streets
  - a network of greenspaces (including parks) and public places
  - crime prevention
  - security measures
  - access and inclusion
  - efficient use of natural resources
  - cohesive & vibrant neighbourhoods" (Paragraph: 006 Reference ID: 26-006-20140306. Revision date: 06 03 2014)
- 3.50 Further guidance is provided by the PPG on the nature of public benefits. These may follow from many developments and can be anything that delivers economic, social or environmental progress as described in the NPPF (paragraph 8).
- 3.51 They should be of a nature of scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public to be genuine public benefits. Benefits become relevant countervailing considerations if there is a finding of harm, then benefits to heritage interests attract particular weight in their own right under the terms of paragraph 193 of the NPPF.

- Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA) (2013)**
- 3.52 The methodology has been prepared using the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) (3rd edition, 2013), co-authored by The Landscape Institute and the Institute of Environmental Management and Assessment, which is broadly relevant to the assessment of heritage impacts, especially those relating to setting, as well as to visual and landscape impacts.
- An Approach to Landscape Character Assessment (2014)**
- 3.53 In October 2014 Natural England published 'An Approach to Landscape Character Assessment'. This document follows on from the 2002 Landscape Character Assessment: Guidance for England and Scotland published by 2002 the then Countryside Agency in England (now part of Natural England), Scottish Natural Heritage. The document sets out a best practice approach for those wishing to carry out Landscape Character Assessments.
- Historic England, Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (2015)**
- 3.54 Managing Significance in Decision-Taking in the Historic Environment (GPA2) was published by Historic England on 27 March 2015. The guidance acknowledges the primacy of relevant legislation and is intended to support the implementation of national policy.
- 3.55 GPA2 sets out a framework of four inter-related key values for assessing the significance of historic buildings and places. The significance of a heritage asset is the sum of its archaeological, architectural, historic, and artistic interest.
- 3.56 The advice in the guidance emphasises that activities to conserve or investigate heritage assets need to be proportionate to the significance of the heritage assets affected and the impact on that significance.
- 3.57 The note advocates a structured approach to assessing development proposals likely to affect the significance of heritage assets, and proposes six 'stages' to follow, stating 'it is good practice to check individual stages of this list but they may not be appropriate in all cases and the level of detail applied should be proportionate'. These are set out in paragraph 6 as follows:
- "Understand the significance of the affected assets*  
*Understand the impact of the proposal on that significance*  
*Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF*  
*Look for opportunities to better reveal or enhance significance*  
*Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change*  
*Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected".*
- Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2017)**
- 3.58 The Setting of Heritage Assets (GPA3) was published by Historic England in December 2017. It replaces The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 – 1st edition, (Historic England, 2015) and Seeing the History in the View: A Method for assessing Heritage Significance within Views (English Heritage, 2011).
- 3.59 The 'Setting of a heritage asset' is defined in the Glossary of 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.' This definition is adopted in the Historic Environment Good Practice Advice in GPA3.
- 3.60 At paragraph 19 of the guidance note, Historic England recommends a broad, five step approach to assessing the impact of development upon the setting of heritage assets. The approach, if not the precise stages, corresponds to EIA practice.
- 3.61 The guidance makes clear that the setting of a heritage asset is not an asset in its own right, nor a heritage designation. The importance of setting lies in what it contributes to the heritage value of the receptor. An impact on setting may not, then, have an effect on the overall heritage value of the asset.
- 3.62 GPA3 sets out a series of characteristics that it may be appropriate to consider when assessing significance. These are not intended to be an exhaustive check list, but rather a guide to understanding what may contribute to setting. They include the asset's physical surroundings, such as:
- Topography
  - Relationship to other nearby heritage assets
  - Character of surrounding streetscape or landscape, including open spaces
  - Formal design and land use
  - Historic materials or surfaces
  - Functional relationships and communications
  - Degree of change over time
- 3.63 The experience of an asset can also play a role in its setting, for instance through:
- Views
  - Visual prominence
  - Intentional intervisibility with other features
  - Noise or other nuisances
  - Level of tranquillity or activity
  - Accessibility, permeability and patterns of movement
  - Degree of promotion to the public
  - Rarity of comparable examples of setting
  - Cultural or other associative relationships
- 3.64 These characteristics, and others where relevant, are considered in assessing the significance of individual assets. Essentially, setting relationships can be created where there are visual connections or through some other association, such as a functional or historical association.

- 3.65 The guidance notes that proposals should explore ways to maximise enhancement and avoid or minimise harm. Paragraph 38 states that the enhancement may be achieved by actions including:
- “removing or re-modelling an intrusive building or feature
  - replacement of a detrimental feature by a new and more harmonious one;
  - restoring or revealing a lost historic feature or view;
  - introducing a wholly new feature that adds to the public appreciation of the asset;
  - introducing new views (including glimpses or better framed views) that add to the public experience of the asset, or;
  - improving public access to, or interpretation of, the asset including its setting.”
- London View Management Framework Supplementary Planning Guidance (2012)**
- 3.66 The London View Management Framework Supplementary Planning Guidance was published in March 2012 to explain in greater detail the policy approach outlined in Policies 7.11 and 7.12 of the London Plan (2011).
- 3.67 Development should, according to London Plan Policy 7.11, be assessed against the LVMF supplementary planning guidance (2012) if it falls within the foreground, middle ground or background of designated views. The Proposed Development is located within a some River Prospects designated views.
- 3.68 With regard to night-time effects/lighting the LVMF states that the assessment of effects on designated views should refer to night-time effects/lighting of the proposals and their impact on the landmarks and the viewing experience generally.
- ICOMOS ‘Guidance on Heritage Impact Assessments for Cultural World Heritage Site Properties’ (2011)**
- 3.69 ICOMOS, the International Council on Monuments and Sites, has published specific guidance on the assessment of heritage impact assessments in relation to World Heritage Sites (WHS), especially in relation to Environmental Impact Assessments. This guidance stresses the importance of the inscribed ‘Outstanding Universal Value’ (OUV) of a WHS and the extent to which WHS must be treated as single heritage assets with clearly articulated international value. This OUV is reflected in a range of attributes that must be protected if OUV is to be sustained.
- 3.70 The guidance notes that the assessment of impacts of a proposed development on a World Heritage Site must be clearly tied to its OUV, and that the assessment needs to consider the impact of any proposed change upon these attributes, both individually and collectively.
- 3.71 In preparing this assessment we are mindful of the ICOMOS guidance, which sets out a methodology to ensure WHSs are considered as discrete entities and that the impact of proposals on the range of attributes that make up the Outstanding Universal Value (OUV) of WHSs, both individually and collectively, are assessed in a systematic and coherent way.
- 3.72 The guidance is a tool to encourage applicants and decision makers to consider key factors at an appropriate time and at an appropriate level of detail. It highlights that the weight given to heritage values should be proportionate to the significance of the heritage asset and the impact of the change upon it.
- 3.73 In preparing this assessment due regard has been given to the stages of assessment set out in Appendix 1 of the ICOMOS guidance.
- The Palace of Westminster and Westminster Abbey including St Margaret’s Church World Heritage Site Management Plan (2007)**
- 3.74 The Westminster World Heritage Site (WHS) Management Plan was adopted in May 2007. It provides a summary of the history and development of the site, a statement of significance and identifies risks and opportunities which may affect the significance of the World Heritage Site.
- 3.75 The management plan (2007) describes the overarching significances of the WHS, stating that the WHS is of international importance:
- “As a place where sovereignty has been conferred and exercised continuously for nearly a thousand years;
  - In the development of parliamentary government and its transmission around the world;
  - As the place from which a significant part of the world was ruled in the 19th and first half of the 20th centuries; and
  - For the outstanding architectural value of its buildings and their contents.”
- 3.76 Whilst the management plan does not detail the setting of the WHS, it does highlight that there are strategic protected views of the WHS and other important views beyond the WHS, including views of the river frontage of the Palace of Westminster, Big Ben and Victoria Tower. It highlights that Victoria Tower Gardens forms an important part of the setting of the WHS and contains a number of memorials.
- 3.77 The management plan highlights that without appropriate consideration of the sensitivities of the WHS and its setting, development beyond the WHS boundary may pose risks to the OUV of the WHS. It states that, “... any change to the style or backdrop of the WHS from many angles, must be carefully balanced against the need to preserve the iconic value of the site.” (para 3.1.3.2, pg 108)
- 3.78 The vision for the WHS includes for it to be set within a public realm that is attractive and sensitive to the OUV and significance of the WHS.

### London World Heritage Sites – Guidance on Settings (GLA, 2012)

3.79 The GLA's World Heritage Sites – Guidance on Setting SPG provides the following overview of the Westminster WHS:

*“The Palace of Westminster, Westminster Abbey and St Margaret’s Church lie next to the River Thames in the heart of London. With their intricate silhouettes, they have symbolised monarchy, religion and power since Edward the Confessor built his palace and church on Thorney Island in the 11th century AD. Changing through the centuries together they represent the journey from a feudal society to a modern democracy and show the intertwined history of church, monarchy and state... The iconic silhouette of the ensemble is an intrinsic part of its identity recognised internationally with the sound of Big Ben being broadcast regularly around the world.”*

### External Lighting for Historic Buildings (HE, 2007)

3.80 Historic England's guidance on external lighting for historic buildings states that one of the main objectives of external lighting should be to give buildings and structures an added dimension that enhances their key architectural elements as well as their social and historical significance. It also states that external lighting should aim to enhance night-time orientation and use, which could benefit the local economy.

3.81 The guidance highlights that subtle external lighting when designed with care and sensitivity can bring added life and scope to important landmarks. It becomes an extension to the architecture, improving the quality of the view and complementing the structure's shape, colouration and form. It also highlights that:

*“- Designers must look to limit the amount of light to that strictly necessary to achieve the aims of the scheme; and that - external lighting to reinforce a building’s patterns can increase the appreciation of architectural details.”*

3.82 In addition to the legislation and policy set out above, the assessment will take into consideration other relevant planning guidance and any material considerations, including:

- Photography and photomontage in landscape and visual impact assessment: Landscape Institute Advice Note 01/11;
- Good Practice Guide for the Illumination of Buildings and Monuments (Westminster City Council, 1994)

- Westminster Abbey and Parliament Square Conservation Area Audit, City of Westminster (2008);
- Whitehall Conservation Area Audit, City of Westminster (2003);
- Smith Square Conservation Area Audit, City of Westminster (2005);
- Millbank Conservation Area Audit, City of Westminster (2005);
- Albert Embankment Conservation Area Character Appraisal, London Borough of Lambeth (2017); and
- Lambeth Palace Conservation Area Character Appraisal, London Borough of Lambeth (2017).

### Emerging Policy

#### New Draft London Plan showing Minor Suggested Changes (August 2018)

- 3.83 The 'New Draft London Plan' was published for public consultation in December 2017 and on 13 August 2018 the Mayor published a version of the draft plan that includes minor suggested changes. The next formal step will be the holding of an Examination in Public (EIP), which is likely to be held in January 2019.
- 3.84 The draft policies pertinent to the assessment of heritage, townscape and visual impact are contained in Chapter 3 (Design) and Chapter 7 (Heritage and Culture). They broadly reflect existing policy and include Draft Policy D1 (London's form and characteristics), which seeks to encourage good development through good design and states that development design should enhance the local context, positively respond to local distinctiveness by identifying the special and valued features that are unique to the locality and respect heritage assets that make up the local character. The supporting policy text notes that change is a fundamental characteristic of London and that understanding of character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. Paragraph 3.1.2A highlights that,
- “Opportunities for change and transformation, through new building forms and typologies, should be informed by an understanding of a place's distinctive character, recognising that not all elements of a place are special and valued.”*

3.85 Draft Policy HC1 (Heritage conservation and growth) generally reflects Policy 7.8 of the existing London Plan and states that proposals affecting the setting of heritage assets should conserve their significance and identify enhancement opportunities by integrating heritage considerations early on in the design process.

3.86 The plan remains at an early stage and is therefore afforded limited weight.

#### Westminster City Plan 2019-2040

3.87 Consultation on the emerging Westminster City Plan began on 12th November 2018, and will run until December 21st 2018.

3.88 Draft Policy 37 (Design Principles) states:

*“A. New development will incorporate exemplary standards of high quality, sustainable and inclusive design and architecture befitting Westminster's world-class status, environment and heritage, and its diverse range of locally distinctive neighbourhoods.”*

3.89 Part B states that:

*“All development will positively contribute to Westminster's townscape and streetscape, having regard to:*

- 1. The character and appearance of the existing area, adjacent buildings, the spaces around and between them and the pattern and grain of existing streets;*
- 2. Materials, building lines, scale, orientation, access, definition, surface treatment, height and massing;*
- 3. The form, character and ecological value of parks, gardens and other open spaces;*
- 4. Westminster's waterways and waterbodies; and*
- 5. The preservation and enhancement of the surrounding tree population.”*

- 3.90 The Policy goes on to state that:  
*"C. All development will place people at the heart of the design process, including by incorporating inclusive and accessible design principles, measures that reduce the opportunity for crime and anti-social behaviour, and ensuring the amenity of new and existing users.*  
*D. Development will enable the extended lifetime of buildings and spaces and respond to the likely risks and consequences of climate change by incorporating principles of sustainable design, including:*  
 1. Use of high quality durable materials and detail;  
 2. Providing flexible, high quality floorspace;  
 3. High standards of resource efficiency;  
 4. Enabling the incorporation of, or connection to, future services or facilities;  
 5. Minimising the need for plant and machinery; and  
 6. Design and construction to enable effective management."
- 3.91 Finally, Part E of the Policy states that:  
*"Imaginative contemporary architecture and use of modern building techniques and materials will be encouraged where they result in buildings and public realm embodying the highest standards of environmental sustainability that respect and enhance their surroundings and Westminster's heritage."*
- 3.92 The parts of Draft Policy 38 (Westminster's Heritage) pertinent to built heritage matters and this application state that:  
*"A. Westminster's heritage assets and their settings will be sustained and their significance enhanced. Harm to heritage assets will be avoided or minimised.*  
*B. Wherever practicable and appropriate, development will optimise the positive role of the historic environment, including in particular promoting public enjoyment and awareness of the city's heritage.*  
*D. The authenticity and integrity, Outstanding Universal Value and immediate and wider setting of Westminster World Heritage Site comprising of the Palace of Westminster and Westminster Abbey, and including St Margaret's Church will be conserved and enhanced. The wider setting includes the protected silhouette as identified in the Mayor's London View Management Framework*  
*and important views across, out of, and towards the World Heritage Site.*  
*E. Listed buildings and their settings will be conserved. Proposals for their viable use that helps restore, retain and maintain these important heritage assets will be welcomed.*  
*G. Development will conserve or enhance the character, distinctiveness and appearance of conservation areas and their settings and will conserve and retain features that contribute positively to the significance of the conservation area.*  
*K. Proposals affecting historic parks and gardens will safeguard their conservation values, appearance and wider setting and preserve their historic integrity."*
- 3.93 The salient parts of Draft Policy 39 (Townscape and Architecture) state that:  
*"A. Development will be sensitively designed, having regard to the prevailing scale, character, external materials, architectural quality and degree of uniformity in the surrounding townscape.*  
*B. Spaces and features that form an important element in local townscapes will be conserved, including facades, boundary walls and railings, historic roof forms or structures, lightwells, traditional shopfronts, historic street furniture, squares, parks and gardens. Where possible, lost or damaged features will be reinstated or restored.*  
*C. Development of a sufficient scale to differentiate it from the surrounding townscape will maximise opportunities to enhance the character, quality and functionality of the site and its surroundings, including through creating new compositions and points of interest.*  
*E. New development within designated strategic views and protected vistas will demonstrably enhance their characteristics, composition and significance, and will remedy past damage to views wherever possible."*
- 3.94 The salient parts of draft policy 41 (Public Realm) state:  
*"A. Development will contribute to a well-designed public realm with use of high quality and durable materials capable of easy maintenance and cleaning, and the integration of high quality soft landscaping as part of the streetscape design.*  
*B. The public realm will be safe, attractive and accessible to all. Development will, as far as practicable:*  
 1. Maximise pedestrian convenience in through-routes, access and entrance points, along desire lines and at crossings;  
 2. Provide step-free legible access;  
 3. Design out conflicts between transport modes;  
 4. Enhance space through decluttering, resurfacing and improving accessibility;  
 5. Improve wayfinding and signage;  
 6. Improve lighting and follow the principles of designing out crime;  
 7. Create new quiet routes; and  
 8. Provide facilities for pedestrians to rest and relax, including seating."  
*The part of draft policy 42(Basement Development) which is relevant to built heritage matters states that basement development will:*  
*"7. Conserve the character and appearance of the existing building, garden setting or the surrounding area, ensuring lightwells, plant, vents, skylights and means of escape will be sensitively designed and discreetly located."*
- 3.95 The plan remains at an early stage and is therefore afforded no material weight.



// NATIONAL HOLOCAUST MEMORIAL



Baseline: Built Heritage

## 4.0 BASELINE: BUILT HERITAGE

4.1 This section provides a description of the historic development of the Site, and of the surrounding area.

4.2 The section and **Section 5.0** have been informed by archival research and secondary sources, including:

- Bradley, Pevsner & Schofield, *Buildings of England*, London 6: Westminster (2003);
- Harley, Robert K. *London's Victoria Embankment: Including Westminster Bridge, Hungerford Bridge, Waterloo Bridge and Blackfriars Bridge*. Capital History (2005);
- Thornbury, Walter. *Old and New London: Volume 3, The Royal Palace of Westminster*, pp. 491-502, (1878), accessed via British History Online;
- Port, Michael Harry. *Imperial London: Civil government building in London 1850-1915*. Yale University Press (1995);
- Port, Michael Harry (ed). *The Houses of Parliament*. Paul Mellon Centre for Studies in British Art (1976);
- Riding, C and J (eds), *The Houses of Parliament: history, art and architecture* (2000); and
- Ward-Jackson, Philip. *Public Sculpture of historic Westminster*. Liverpool University Press (2011).

### Overview of Historical Development

4.3 Below, we provide an overview of principal phases of development and change in the area around the Site.

#### Early History

4.4 Tradition states that a young fisherman named Aldrich had a vision of St Peter near to Thorney Island. An Abbey was founded on the site in the 960s-970s, and a community of Benedictine Monks was established under Saint Dunstan (909-988).

4.5 St Peter's Abbey, as it became known, was rebuilt by King Edward the Confessor (1003-1066) between 1042 and 1052, and was consecrated in 1065, a week ahead of Edward's death on January 5th, 1066. Harold Godwinson (1066) became the first English king in a long line

4.6 The site of the Palace of Westminster may have been used as a Royal residence by Canute the Great between 1016 and 1035, but it was certainly the residence of Edward the Confessor, who built a palace on Thorney Island to be close to Westminster Abbey.

4.7 The palace was greatly enlarged in the Middle Ages, and was the principal royal residence for much of this time. The exact extent of Thorney Island is the subject of some debate, but it is probable that the southern extent was marked by a stream along the line of the present Great College Street.

4.8 The site of the Victoria Gardens lies to the south of the Old Palace. Aga's Map of 1578 (**Figure 4.1**) shows that the northern part of this land accommodated the Abbot of Westminster's Mill and a slaughter house, whilst the southern part remained open land. Near the site of the later Lambeth Bridge was a ferry, capable of transport horses across the river, giving name to Horseferry Road.

4.9 The Palace of Westminster ceased to be a royal residence in 1529, when Henry VIII moved to Whitehall Palace. The upper and lower houses of parliament remained in situ at the palace, and alterations were undertaken over the subsequent centuries to facilitate their use.

4.10 Strype's Map in Stow's Survey of London (1720) shows the Abbey and Parliament complex set predominantly amongst open land, with new development to the north and west. In the late 17th and early 18th centuries, the area to the south of the Abbey and Palace, around Smith Square and Lord Nelson Street, was developed. The map at **Figure 4.3** showing St Margaret's Parish, was published in 1720, and shows the area with tenements and wharves along the riverfront.



Figure 4.1 Aga's 1578 Map



Figure 4.2 Strype's Map of London, 1720

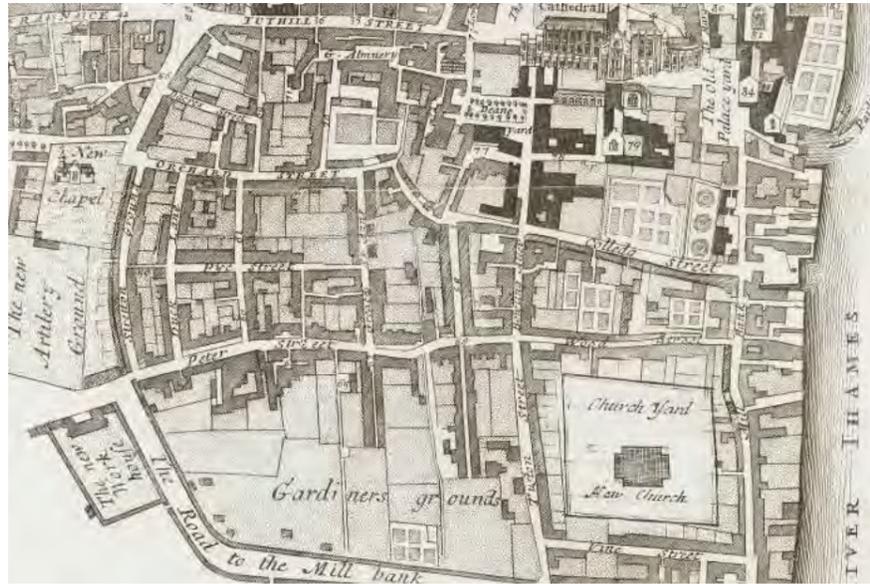


Figure 4.3 Strype's Map of St Margaret's Parish, 1720

4.11 By the mid-eighteenth century, the site of the Garden was covered with wharves that came up hard against Parliament Stairs, immediately to the south of the Old Palace complex, running as far south as the horse ferry at what is now Lambeth Bridge. Between the wharves and Old Palace was access to the river, provided via stairs known as Parliament Stairs. The northernmost wharves were removed when the present Parliament building was built.

4.12 The majority of the old parliament complex, excluding the 13th century Westminster Hall, was destroyed in a fire in 1834.



Figure 4.4 Rocque's Map of 1746

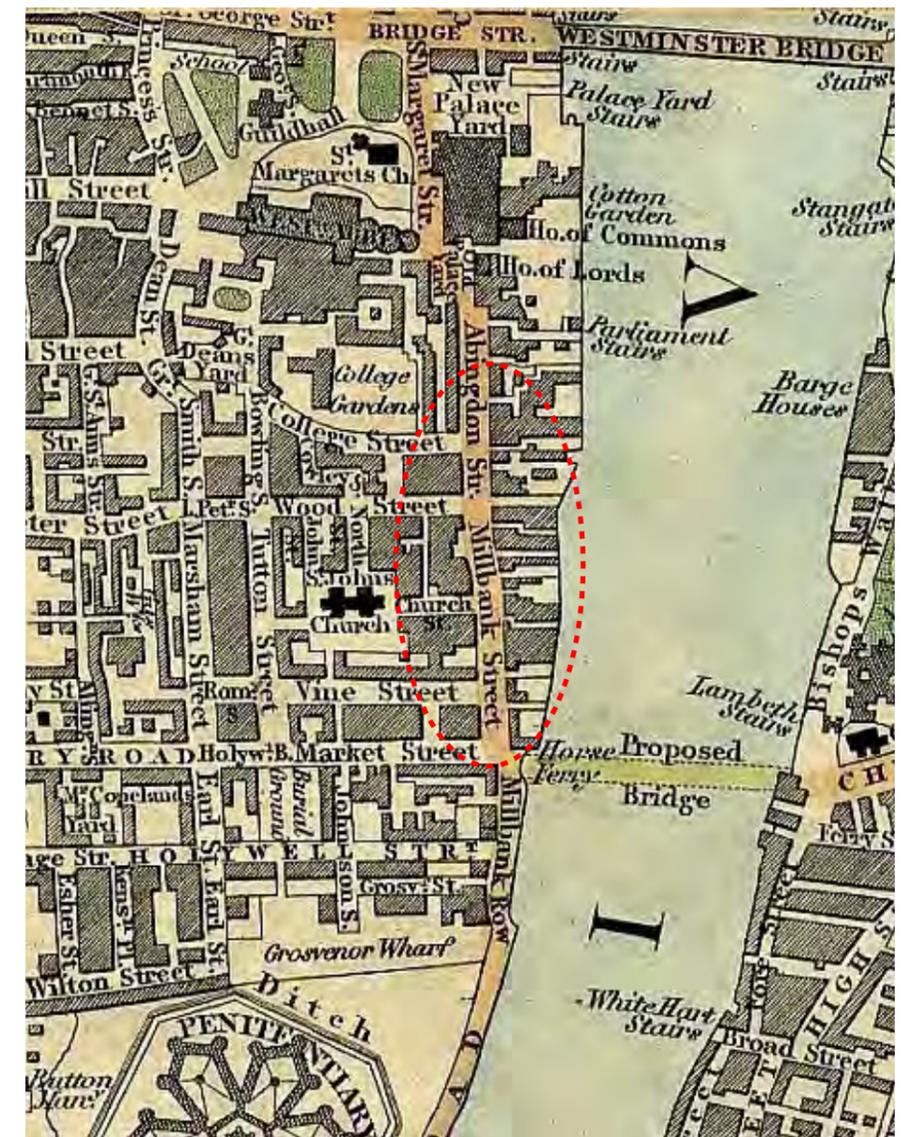


Figure 4.5 Crutchley Map of 1827, made shortly before the old Parliament buildings burned down. Lambeth Bridge was not built until the 1860s.

*Charles Barry's Houses of Parliament*

- 4.13 The present Parliament building was designed by Sir Charles Barry and Augustus Pugin, who began works in 1840. The new building opened in 1852, but the final internal work was not completed until the 1860s. The commission for the building was limited to the site of the old Palace of Westminster and did not include the embankment of the river to the south, where the present garden is located.
- 4.14 The Victoria Tower was built as part of the competition winning plans for the reconstruction of the Palace of Westminster after the fire of 1834. Its purpose was as a "fireproof repository for books and documents", and was originally known as the King's Tower, before being renamed in 1897 as a tribute to Queen Victoria in her Diamond Jubilee year. The tower houses the Parliamentary Archives.
- 4.15 Early plans for the site show only a narrow yard to the south of the building. Reports from later years suggest that the idea of a garden to the south was occasionally discussed, but there is no evidence that there was an intention to create a garden on the site during the construction of the building.

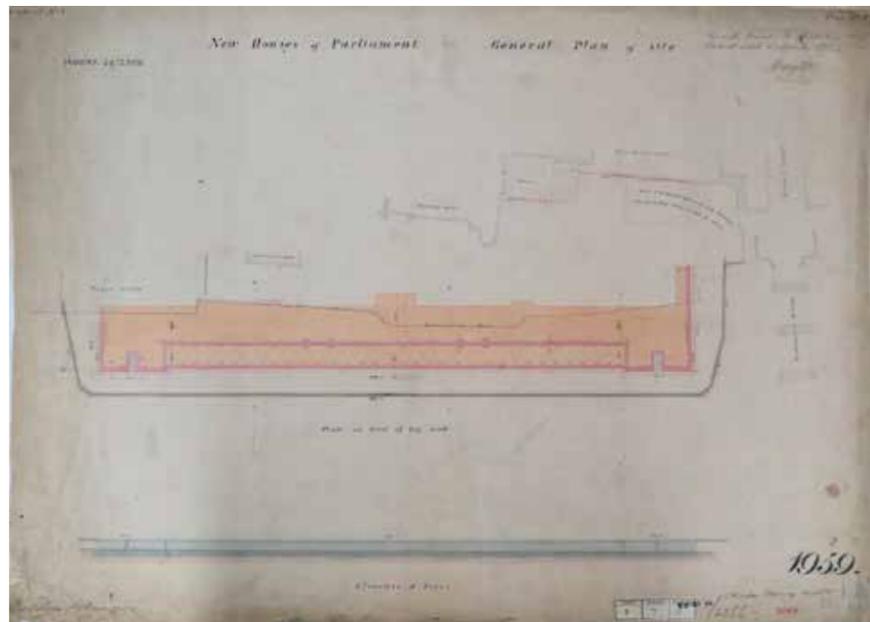


Figure 4.6 Charles Barry's plan for the embankment in front of the Houses of Parliament



Figure 4.7 1851 plan showing the narrow yard (F) to the south of the Houses of Parliament, with wharves beyond



Figure 4.8 Undated 1860s or early 1870s photograph of the Houses of Parliament showing the small embankment to the south of the building and wharves beyond



Figure 4.9 Millbank Street in 1863, looking towards the new Houses of Parliament

- 4.16 From the river, the building sat next to a tangle of wharves, while from the street it was rightly enclosed within a built up urban setting.
- 4.17 In 1857, as part of the competition for new Public Offices, Barry exhibited a grandiose scheme of improvements along both banks of the river. This was not formally entered into the competition, but according to his biographer was intended to sum up all of his ideas for metropolitan improvements in a single place. It was also apparently intended to promote the interests of his architect sons, Charles and Edward, in the hope that they would be commissioned to undertake the construction of the suggested buildings.

- 4.18 The Barry plan shows Millbank widened, a large, rectilinear garden to the south of Parliament, new bridges at Lambeth and Westminster, large new government buildings, and embankments and new buildings along the south bank. Barry's plan was never realised, although some of the improvements he suggested were later carried out in different forms.

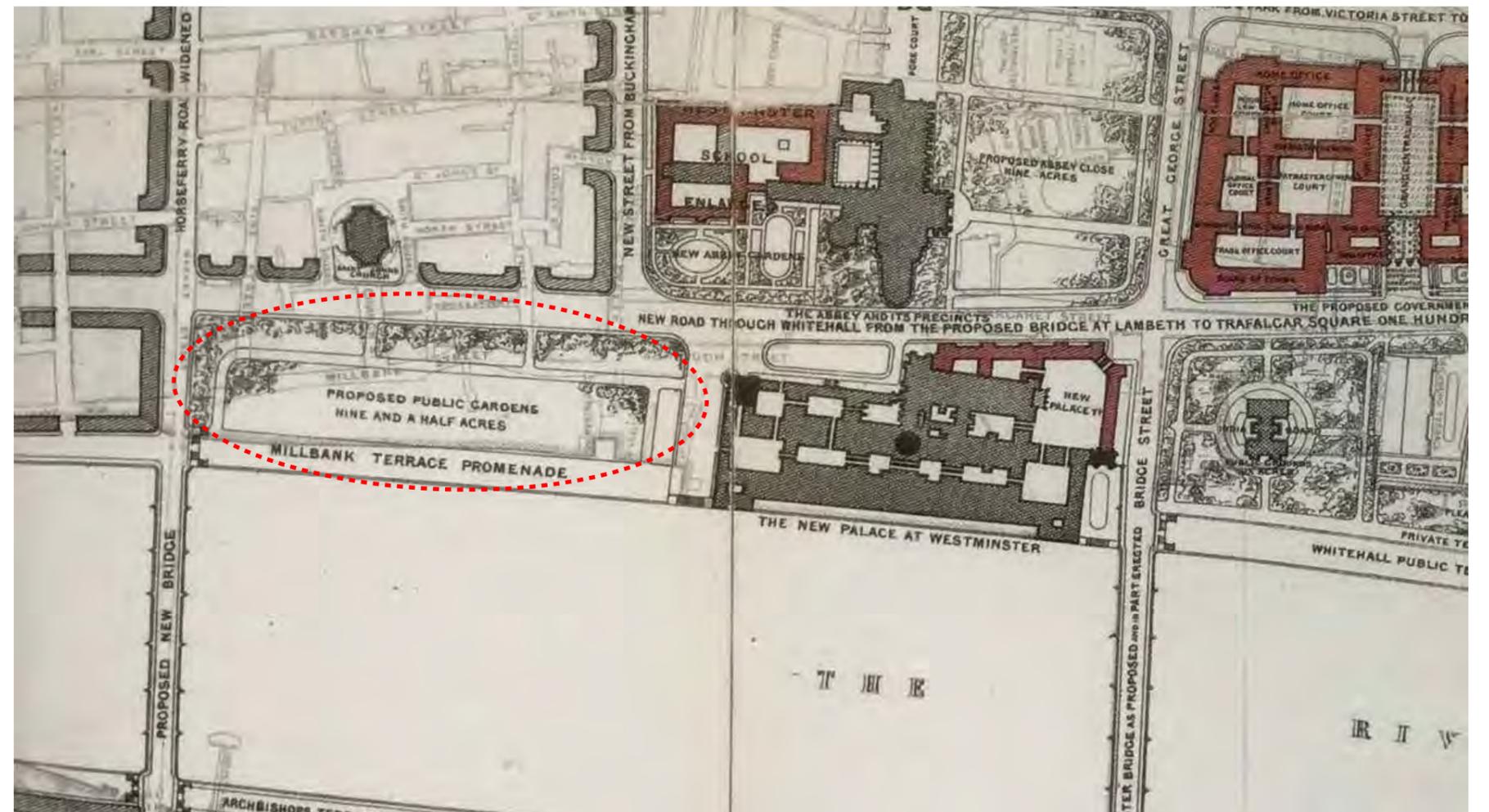


Figure 4.10 Charles Barry's 1857 plan of suggested improvements around the Houses of Parliament, including in Alfred Barry, Life and Work of the Late Sir Charles Barry, 1870

- 4.19 An embankment to the south of the Houses of Parliament was not included in the 1861 proposals for embanking the Thames that resulted in Joseph Bazalgette's Victoria Embankment, stretching from the north side of Westminster Bridge to Mansion House.
- 4.20 The Lambeth suspension bridge opened in 1862 and provided an ideal vantage point to admire the picturesque jumble of wharf buildings and cranes adjacent to the new Parliament building. These views were popular with artists and photographers.



Figure 4.11 Photograph of the early 1860s by William Strudwick looking north towards the new Parliament building, showing the wharves that existed before the Victoria Tower Gardens were built, probably taken from the Lambeth suspension bridge, opened in 1862

*Embankment and Parade Ground: c. 1867-1874*

- 4.21 In 1863 a Parliamentary commission examined the possibility of “uniting the intended Embankment at Westminster Bridge with the existing Embankment at Millbank”. The commission was primarily concerned about the proximity of the wharves to the building, and the fact that some of them were used for flammable materials like hay and wood, there were concerns about the possibility of fire. The state robing room and other apartments on the south side of the Palace had unsavoury views, and the limited amount of space near the royal entrance caused congestion, especially at the opening and closing of Parliament each year.

- 4.22 The commission rejected proposals to widen Millbank and extend the embankment as far as Millbank Prison (now the site of the Tate Gallery) on the grounds of cost, largely resulting from the necessity to buy out the private wharf holders. Instead, it proposed embanking 230' of river to the south of Parliament as far as Great College Street to create a parade ground and service area, and clearing another 185' of buildings (415' in total) to provide a site for “first class houses” facing the newly opened space. The wharves further south were to remain in use. These proposals were formalised under the Houses of Parliament Act 1867.

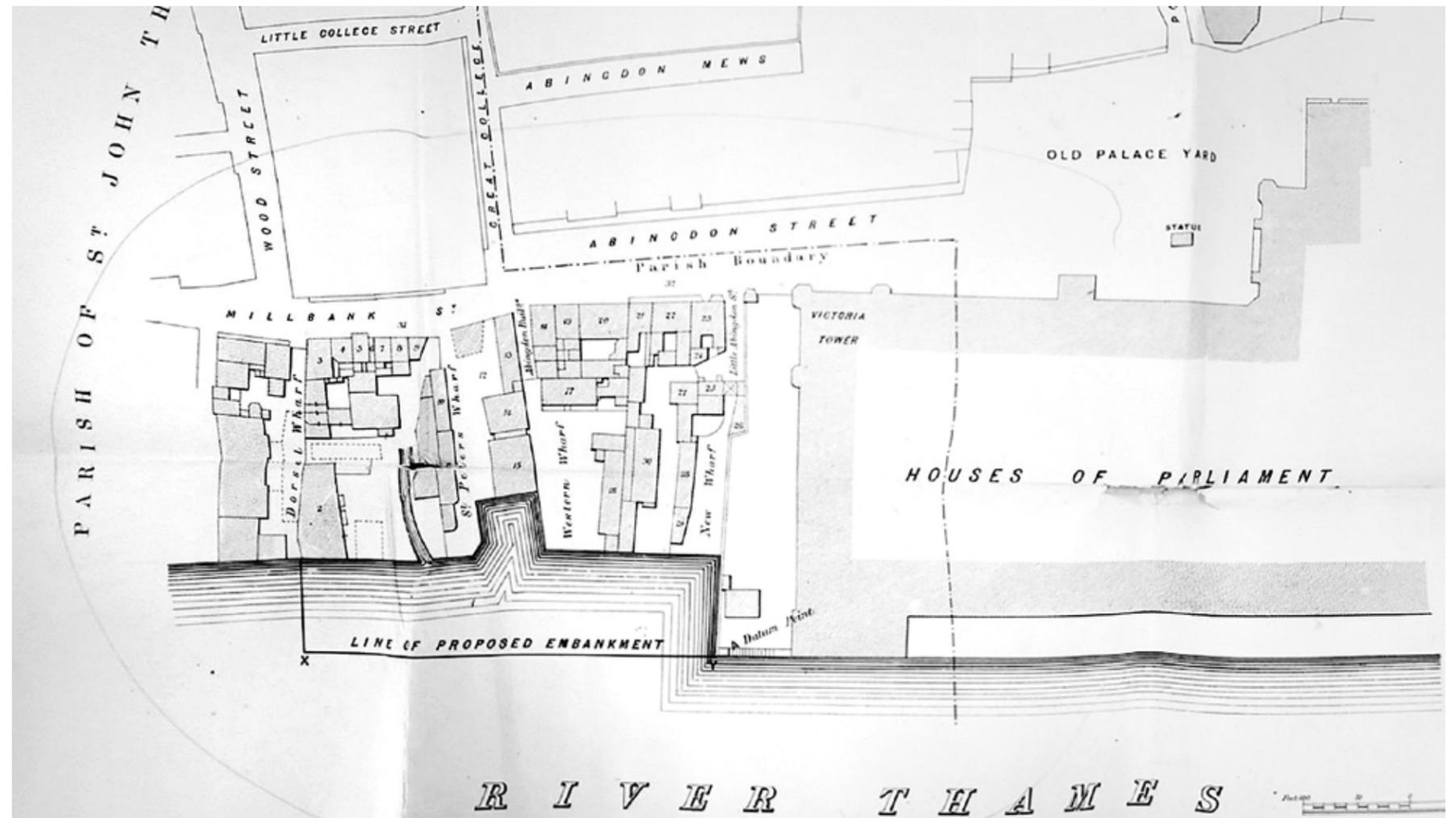


Figure 4.12 Plan of the area proposed to be embanked from the 1867 Act, showing the wharves to be demolished

- 4.23 The work was not sufficiently advanced to be recorded on the first edition Ordnance Survey, although a cleared area where some wharves had begun to be removed is shown.
- 4.24 A plan dated 1875 shows the proposed row of very large houses looking north towards Parliament across a garden rather than a parade ground. It is not clear if the garden was ever laid out in this form, but it probably was not as most records suggest that the garden was only laid out in the early 1880s.

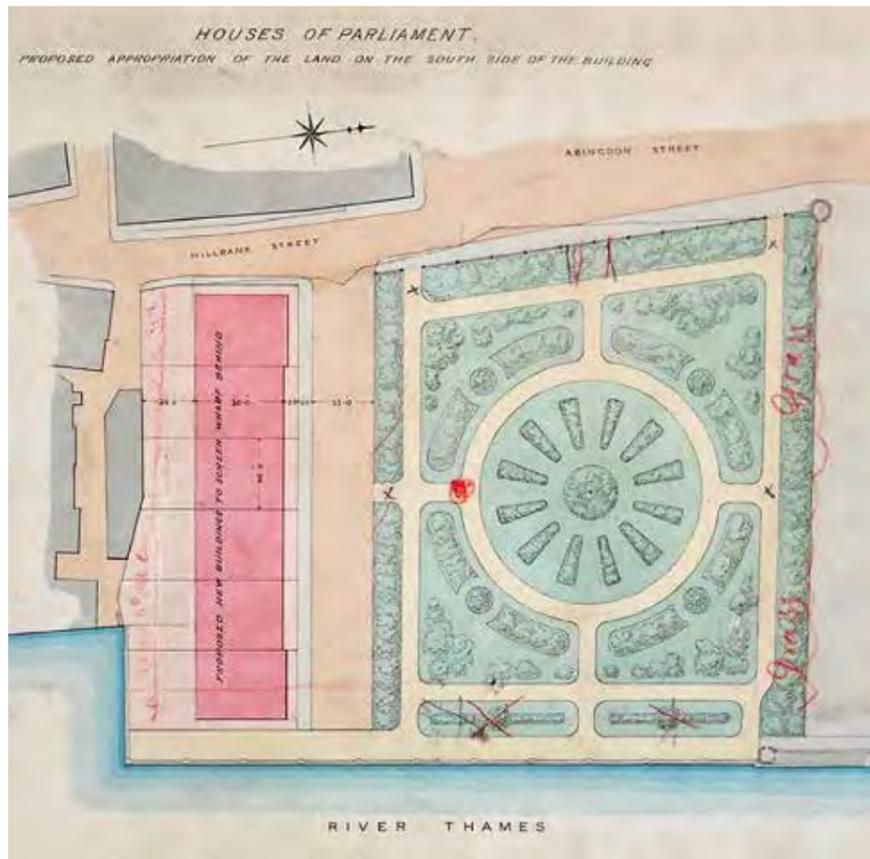


Figure 4.13 Plan dated 1875



Figure 4.14 First edition Ordnance Survey, 1875-1879

*The first Victoria Tower Gardens: 1879-1881*

- 4.25 In the late 1870s, WH Smith, MP and founder of the eponymous chain of newsagents, began to lobby for the conversion of the whole newly embanked area to a garden, and against the building of any houses in this area. The proposals were funded by a donation of £1,000 from Smith, and an additional £1,400 voted by Parliament. The work was carried out in 1800-1881.
- 4.26 The garden was built in 1881 was a rough square. It occupied the whole 415' of land embanked under the 1867 Act, and was flanked by wharves to the south. It is shown on the 2nd edition OS map of 1895, which suggests that the broad concept of the plan of 1875 had been stretched to fit the new, larger site, with a central planting feature with radial paths and many trees.



Figure 4.15 Undated late nineteenth century photograph probably taken shortly after the Garden was opened in 1882, as the trees are newly planted

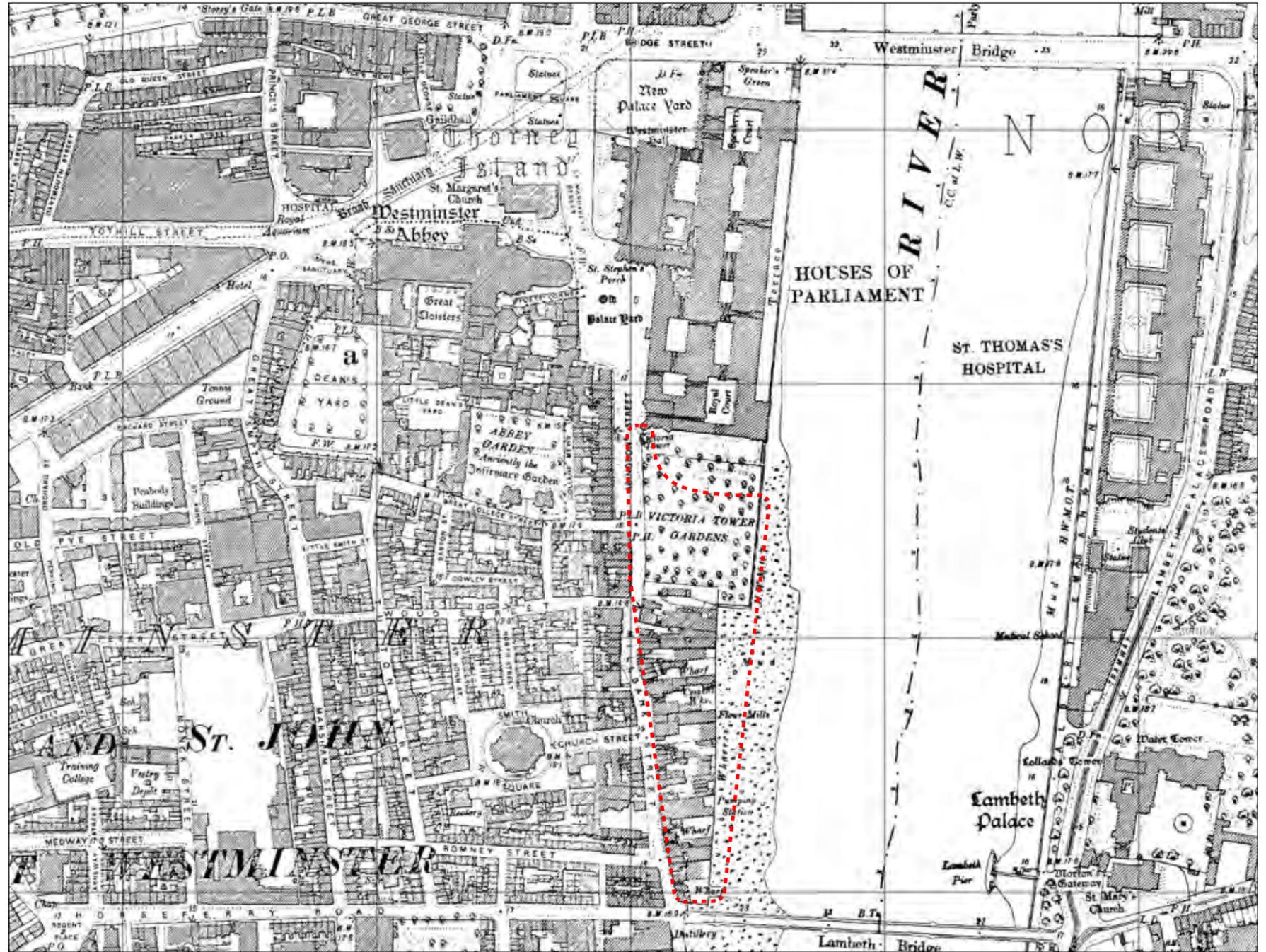


Figure 4.16 Second edition Ordnance Survey, 1895

*Garden Extension: 1910-14*

- 4.27 In 1898, there was a proposal, under a private member's bill in Parliament, for a privately-funded scheme to replace the wharves between the Garden and Lambeth bridge with a large residential block on the site of the present garden extension. This provoked considerable opposition and was defeated. Nonetheless, these proposals spurred more general plans for widening Millbank and embanking the river between the existing part of the Garden and Lambeth Bridge.
- 4.28 Under the London County Council (Improvements) Act 1900, proposals were adopted for enlarging Victoria Tower Gardens as far south as Lambeth Bridge and for widening Millbank in this area. Construction work on the scheme began c.1910 and the garden extension was opened to the public in 1914.
- 4.29 When the gardens were extended c.1910-14, the layout was completely redone. A new circular central planting area was created opposite Great Peter Street (formerly Wood Street). The complex radial paths were removed and replaced by two paths crossing the park from the street to the river, one via the planting opposite Great Peter Street, the other further south opposite Dean Stanley Street.
- 4.30 The majority of the planting in the Victorian scheme, including most of the trees, was also removed in favour of lawn with a few small flower beds. The trees at the north end of the garden next to the Houses of Parliament shown in the Taunt view were also removed and replaced with a row of shrubbery. The lines of trees along the river and the street were extended to encompass the new section, and trees were also planted adjacent to Lambeth Bridge.
- 4.31 The new part of the garden had new railings to the road was based on examples in the Victoria and Albert Museum, but these appear to have been removed in the 1950s if not actually during World War II.
- 4.32 Rodin's Burghers of Calais statue group was installed in 1914 in a position close to the Victoria Tower (near the present site of the monument to Mrs Emmeline Pankhurst, but it was not part of the original design of the extension of the Gardens. The history of how it came to be located in the Gardens is discussed in more detail below.

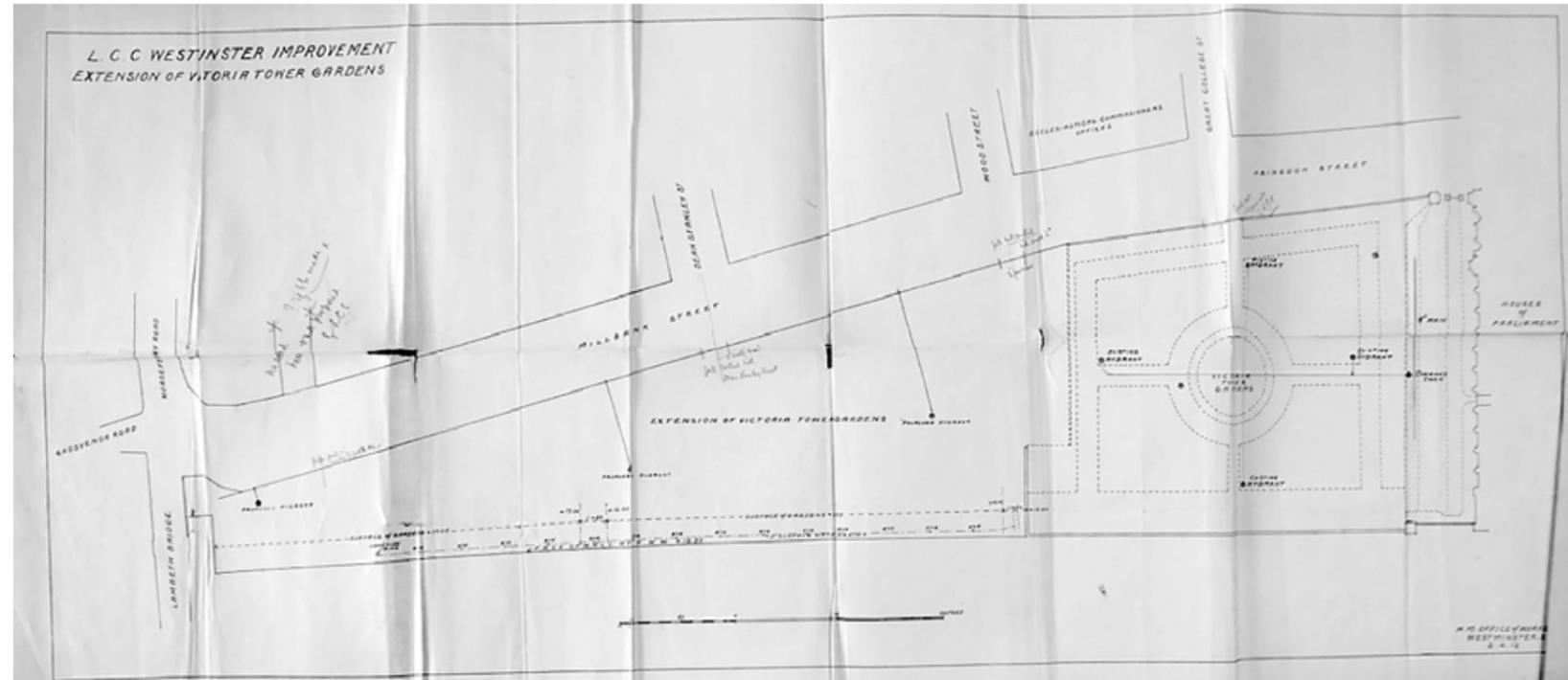


Figure 4.17 Plan of 1912, showing the extension of the garden



Figure 4.18 1915 Ordnance Survey

*The Horseferry Playground: 1923*

- 4.33 The southern part of the garden adjacent to Smith Square was covered in huts in the early 1920s, shown in an aerial view of 1921. These were used as temporary accommodation for civil servants during and after the war.
- 4.34 After the huts were removed, the Horseferry Playground area immediately to the north of Lambeth Bridge was laid out in 1923 under proposals first mooted in 1918. It was funded by the paper merchant and philanthropist Henry Gage Spicer, and was specifically intended to serve the poor children from the many working class flats in the area who might not otherwise have had a safe place to play outdoors. In its original form, it comprised a very large sandpit, seen in contemporary aerial photographs.
- 4.35 At the southern end of the playground, near Lambeth Bridge, was a semi-circular monument to Spicer that comprised a low wall with a bench and water fountains. It was designed by Philip Tilden, who was commissioned to design something “in the grand manner” but without pretty columns or temples. The sculpted animals at either end were created by a Miss Harris with the assistance of the sculptor Charles Sargeant Jagger. The monument was moved to its present position in 2015.



**Figure 4.19** Aerial photograph of 1921 showing huts, before the area to the south of Lambeth Bridge was embanked (source: Britain From Above)



**Figure 4.20** Aerial view of 1928 during the construction for the embankment south of Lambeth Bridge, but before the demolition of the old suspension bridge (source: Britain From Above)

**Rebuilding of Lambeth Bridge: 1933**

- 4.36 The old Lambeth suspension bridge was built as in 1862 replacing a horse ferry of great antiquity. It was apparently quite rickety, and was used mainly by pedestrians rather than vehicles.
- 4.37 The London County Council (Lambeth Bridge) Act 1924 allowed its rebuilding, and the new bridge opened in 1932. It was designed by architects Sir Reginald Blomfield and G. Topham Forresis and engineer Sir George Humphreys, and is now listed Grade II. The rebuilding of the bridge had several direct impacts on the gardens.
- 4.38 The footings for the new bridge took a small part of the southern end of the Gardens with the result that the children's sandpit had to be moved. There is a set of broad stairs down from the bridge into the garden. A set of public conveniences that was originally specifically designated for children was built under the stairs.

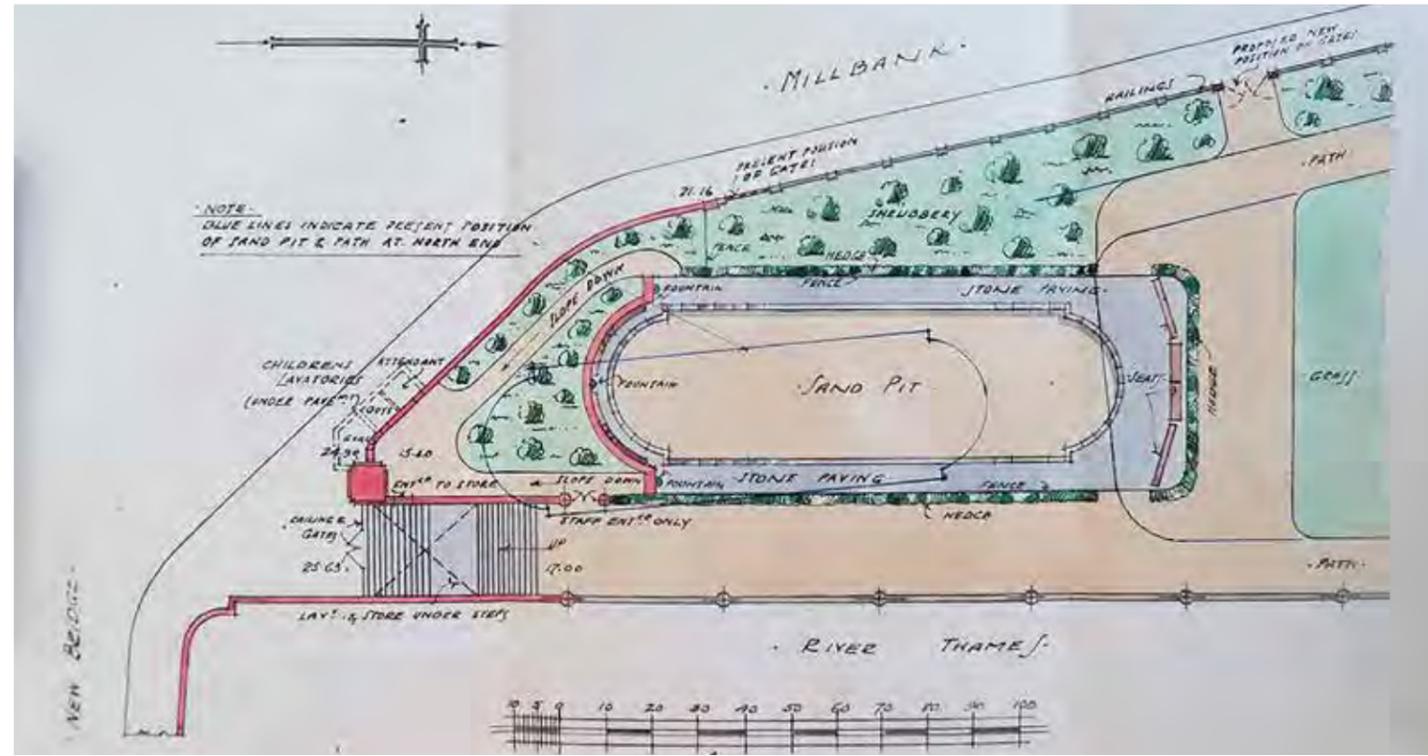


Figure 4.21 Plan of 1927 showing alterations to the sandpit to accommodate the new Lambeth Bridge



Figure 4.22 The Sandpit circa 1955



Figure 4.23 Public lavatories under Lambeth Bridge, restored in 2015

- 4.39 The long slender triangle of open space to the south of Lambeth Bridge was also created in the early 1930s as part of the rebuilding of Lambeth Bridge. Until that date, this area was part of the foreshore outside of the embanked area beyond the Chelsea embankment, and it was not originally planned to have either a garden or an extended embankment here.
- 4.40 However, following floods in Millbank in 1928, the Chelsea embankment was enlarged. The new bridge itself was also redesigned before it was built to carry more motorised traffic. Together, these changes resulted in this long, triangular strip of embanked ground being left over. Public conveniences were also built on this side, but these were intended for adults.
- 4.41 This area was formally incorporated as an extension of Victoria Tower Gardens called Victoria Tower Gardens South, but it is omitted from the area designated a Grade II Registered Park and Garden. Nonetheless, the trees planted here make a visual link to the Victoria Tower Garden to the north of the bridge.
- 4.42 The memorial to Mrs Emmeline Pankhurst, suffragette leader was installed in 1930 adjacent to the shrubbery in the centre of the garden, but this was not related to other projects in the Gardens around this time. The memorial is discussed in more detail below.
- 4.43 Circa 1934 there was a proposal to extend the Victoria Tower Gardens up to the southern edge of the Houses of Parliament, partly on the grounds that the roadway there (now Black Rod's Garden) was never used and partly to improve. It was also proposed to remove the central shrubbery behind the statue of Mrs Emmeline Pankhurst and between the garden and the Parliament building. The Parks and Gardens Register entry suggests that this work was carried out, but files in the National Archives suggest it was not. Photographs in the National Archives files apparently showing the work completed are clearly altered to show what the proposals would look like, and an aerial photographs of 1946 and plans of 1949 shows the shrubberies still in place.

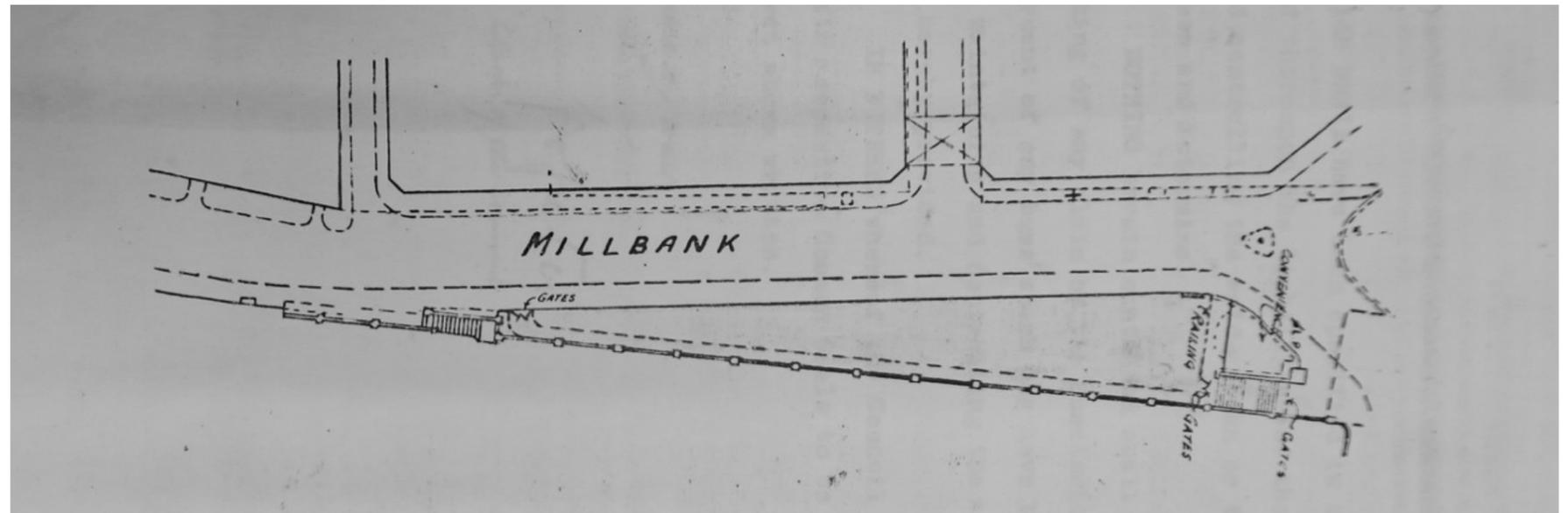


Figure 4.24 Plan of the land embanked to the south of Lambeth Bridge to form Victoria Tower Gardens South

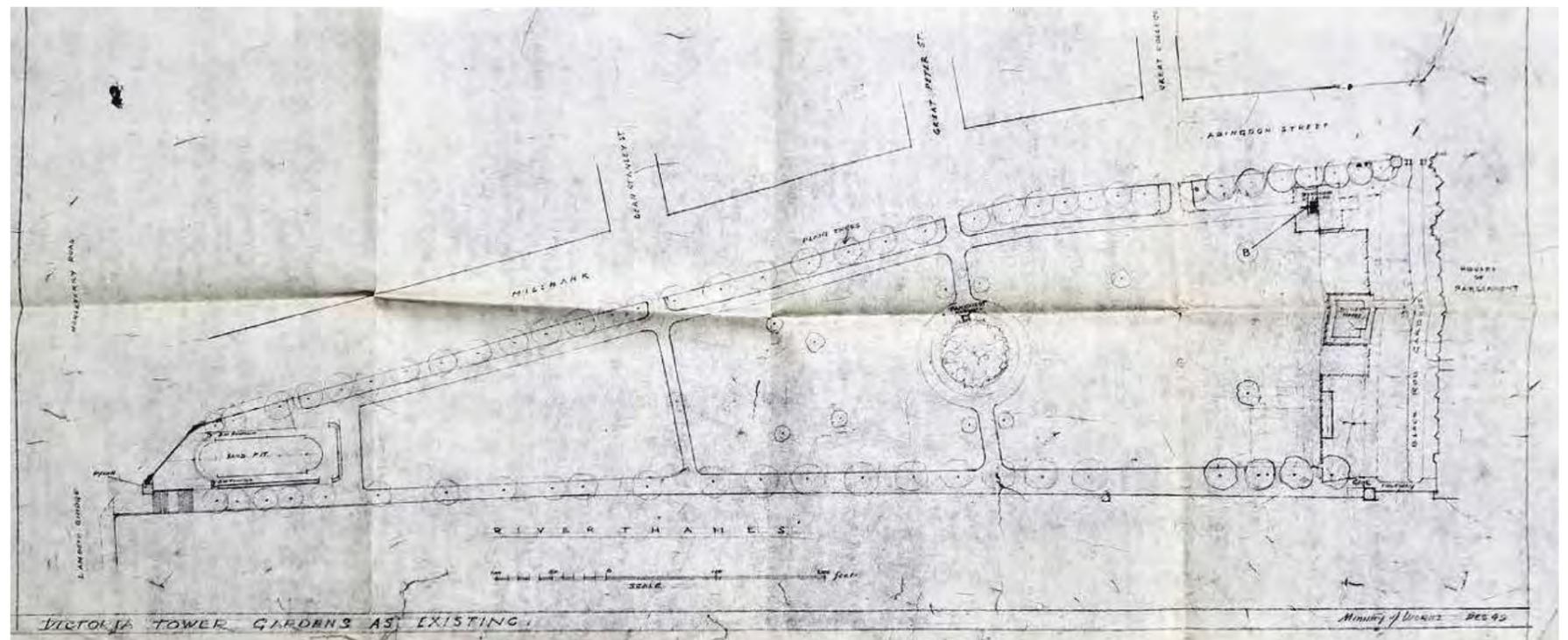


Figure 4.25 As-existing layout of the garden in 1949, almost certainly showing its pre-war arrangement

*World War II*

- 4.44 There was some damage to the river embankment in World War II, and a Westminster Green Plaque installed in 2014 commemorates the emergency repair works carried out there and elsewhere under the direction of Sir Thomas Peirson Frank, Chief Engineer to the London County Council. The repaired section can be seen from the Lambeth side at low tide.
- 4.45 The Houses of Parliament were also damaged in the war. After the war, the northern part of the park was used as a builder's yard for the restoration work.



Figure 4.26 Damage to the embankment wall, 1941



Figure 4.28 Aerial photograph of 1950, during the restoration work on the Houses of Parliament (source: Britain From Above)



Figure 4.27 Aerial photograph of 1946 (source: Britain From Above)



Figure 4.29 The Gardens circa 1955, prior to alteration

*Revised Layout: 1956-59*

- 4.46 The layout of the gardens was significantly altered in the later 1950s once the post-war restoration of the Palace of Westminster had been completed, and the garden was no longer needed as a builder's yard. The plans were drawn up in c.1955/6, and the whole garden was reopened to the public in 1959. The 1950s layout was broadly similar to the present arrangement, including the majority of the present paths, and the general locations of the three main monuments: the Burghers of Calais, the statue of Mrs Pankhurst, and the Buxton memorial fountain, all of which were placed in these positions during this work.
- 4.47 In the northern part of the Garden, the 1950s work included moving the boundary between the Victoria Tower Garden proper and Black Rod's Garden further south (but north of its present position) in a curved shape to accommodate a new plant room for Parliament within Black Rod's Garden.
- 4.48 The statuary group of the Burghers of Calais was relocated to the junction of the two new semi-circular paths meeting at a point just south of Great College Street, and its original high plinth was greatly reduced in height. The statue of Mrs Pankhurst was moved to its present position (the former location of the Burghers of Calais) near the north-west corner of the Garden and provided with its present plinth in 1959.
- 4.49 The Buxton memorial fountain, originally in Parliament Square and placed in storage in 1949, was put in its present position near the river opposite Dean Stanley Street in 1957.
- 4.50 As part of the landscaping, some missing trees along the river side in the northern part of the park, probably destroyed either by bombing or during the wartime restoration of the river wall, were replaced. These are identifiable as they are still slightly smaller than their older neighbours.



Figure 4.30 1955 Layout showing the proposed new layout, including the new locations of statues



Figure 4.31 View south from near the Burghers of Calais, 2018, still reflecting the 1950s layout

*Later Twentieth-Century*

- 4.51 The Garden was the site of the queue of mourners at Lying-in-State in Westminster Hall of King George VI in 1952, Sir Winston Churchill in 1965, and the Queen Mother in 2002.
- 4.52 An oak tree was planted by the Queen in the north lawn to the north of the Burghers of Calais in 1977 to mark her golden jubilee. It was moved to the south lawn in 2003.
- 4.53 In 1987, the Palace of Westminster and Westminster Abbey, including St Margaret's Church World Heritage Site (WHS) was inscribed. The WHS includes Black Rod's Garden to the north of the Victoria Tower Garden, but the Victoria Tower Garden itself is outwith the WHS. The Victoria Tower Garden is not mentioned in the WHS statement of Outstanding Universal Value, but it is described in the WHS management plan as one of "significant public open spaces adjacent to the site" and as the potential location of an extension of the WHS.
- 4.54 Also in 1987 the Victoria Tower Garden became a Grade II Registered Park and Garden.
- 4.55 Minor works have been undertaken to the trees at various times in recent years, including crown lifting and the removal of some branches, but generally they have grown up to provide a sense of enclosure within the garden.

*Restoration of the Burghers of Calais and New Paths: 2003-4*

- 4.56 Under consents granted in 2003, the Burghers of Calais group was extensively restored offsite and returned to the Garden in 2004. It was provided with a new plinth that echoed the original plinth more closely, and was moved 4 metres to the south-west to their present location. As part of this work, the layout of the paths in this area was altered, with new paths created along a slightly different, more symmetrical alignment.
- 4.57 View north in 2018 from near the reset Spicer memorial with late twentieth and early twenty-first-century changes including the Parliamentary education centre and the Jubilee oak.

*Parliamentary Education Centre: 2015*

- 4.58 In 2013 consent was granted for 10 years for a Parliamentary Education Centre the northern part of the Victoria Tower Garden, which was removed from the public garden and reoriented to face Black Rod's Garden and be accessed from that side. It was officially opened in 2015. It has a green wall and green roof to the public Garden, and replaces the shrubbery formerly in this position. As part of its construction, a new layout of paths was created around the Burghers Calais to accommodate the encroachment into the Garden.

*Restoration of Horseferry Playground: 2015*

- 4.59 The Horseferry Playground was extensively restored and renovated with new equipment in 2015 and a new fence designed by Chris Campbell. The work included a new, smaller sandpit, swings, slides, chimes, climbing features, seats, water play feature, improved toilets, and a small refreshment kiosk. It is surrounded by railings designed by Chris Campbell with a Thames theme. As part of this project, the Spicer memorial was restored and relocated to a new position to the north of the playground facing the main body of the Garden.



Figure 4.32 View north in 2018 from near the reset Spicer memorial, with late 20th and early 21st century changes including the Parliamentary Education Centre and Jubilee Oak



Figure 4.33 Parliamentary Education Centre in 2018, view from gates to Black Rod's Garden



Figure 4.34 Parliamentary Education Centre from Victoria Tower Gardens in 2018



// NATIONAL HOLOCAUST MEMORIAL



Assessment of Heritage Assets' Significance

## 5.0 ASSESSMENT OF HERITAGE ASSETS' SIGNIFICANCE

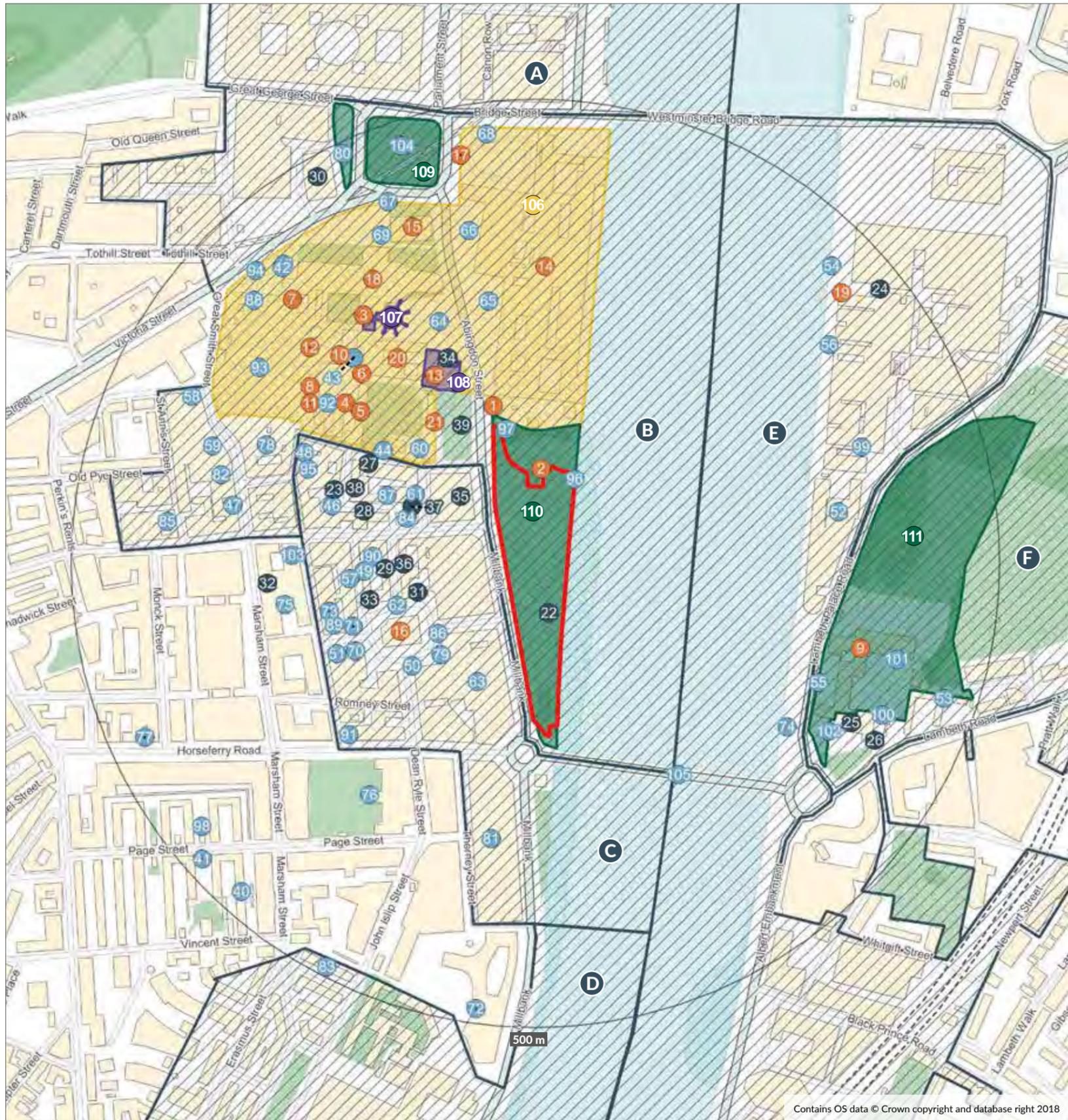
- 5.1 The Site is located in Victoria Tower Gardens (grade II RPG). The park contains a number of structures included on the statutory list, and abuts the Westminster World Heritage Site. There are also heritage receptors in the wider area and the Proposed Development has the potential to impact their setting.
- 5.2 **Table 5.1** identifies the built heritage receptors considered in the assessment and their respective heritage value identified at the baseline stage. **Figure 5.1** identifies the location of the heritage receptors.
- 5.3 In the context of the definition of setting offered in the Framework, (which advises this is 'surroundings in which a heritage asset is experienced'), this defines the setting of heritage assets in very broad terms. Indeed, such a broad scope means that many development proposals may be held to come within the setting of a heritage receptor. Most would agree however that aside from some generic inter-visibility, a great number of such proposals could not reasonably be held to engage with or alter the setting of heritage receptors in a material way.
- 5.4 Owing to the nature and the height of the Proposed Development, the prevailing height of other buildings in the surrounding area, and the screening provided by the existing building forms, the effect on the setting of some built heritage receptors is restricted, and not all receptors within the study area are likely to experience a change to their setting. Those receptors are identified in **Table 5.1**.
- 5.5 For the purposes of this HTVIA therefore professional judgement has been used to select those built heritage receptors that are likely to experience change to their setting, and by extension, their heritage value.
- 5.6 **Appendix 1.3: Built Heritage Baseline provides a detailed description of all built heritage receptors within the study area. This chapter** then provides the baseline assessment of those heritage receptors which may experience change to their setting. The effect upon that significance, or the appreciation thereof, is then considered at **Section 7.0**.

### World Heritage Site

#### Palace of Westminster, Westminster Abbey and St Margaret's Church World Heritage Site

- 5.7 The Palace of Westminster, Westminster Abbey and St Margaret's Church World Heritage Site (The 'Westminster World Heritage Site' or 'WHS') was inscribed in 1987, and its boundaries modified in 2008.
- The WHS buildings*
- 5.8 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 (**Figure 5.2**). 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 south west.
- 5.9 The earliest record of a church at the site dates from the 7th century, and a Benedictine Monastery was founded at Westminster circa 960 by St Dunstan. Westminster Abbey was begun by Edward the Confessor, and was consecrated in 1065, ahead of his own interment behind its high altar in 1066. Following the Norman Conquest, the first coronation (William I) was held in the Abbey, establishing a tradition which endures to the present day. The building underwent substantial alteration under Henry III in the 13th century, and has subsequently been altered piecemeal over successive centuries, including the addition of a chapel to the Virgin Mary under Henry VII, and two 18th century western towers by Nicholas Hawksmoor.
- 5.10 St Margaret's Church was built in the late 11th century, and became the parish church of the Palace of Westminster in 1614. It was later altered and restored by Sir George Gilbert Scott in 1877.

- 5.11 Thorney Island, on which much of the WHS stands, is believed to have been a Royal residence since the time of King Canute (1016-1035). Westminster Hall persists as a remnant of that build by William II (1056-1100), and remained as the monarch's principal residence through the medieval period. Much of the medieval palace was destroyed by fire in 1512 and 1834, with the latter destroying many later additions such as Sir John Soane's neo-classical libraries and the neo-Gothic Houses of Lords and Commons by James Wyatt.
- 5.12 The present building incorporates surviving elements of the earlier palace, such as St Stephen's Chapel and Westminster Hall, but is, in the main, the work of Augustus Pugin and Charles Barry, who were responsible for the reconstruction of Parliament following the 1834 fire.
- Heritage value (Outstanding Universal Value) of the World Heritage Site*
- 5.13 The World Heritage Site derives its heritage value 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.
- 5.14 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. 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.*"
- 5.15 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.
- 5.16 The receptor is of **Exceptional** value.



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## HERITAGE ASSET PLAN

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 Parliament 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 Standards, 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



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Holocaust Memorial, Victoria Tower Gardens

Date:

December 2018

Scale:

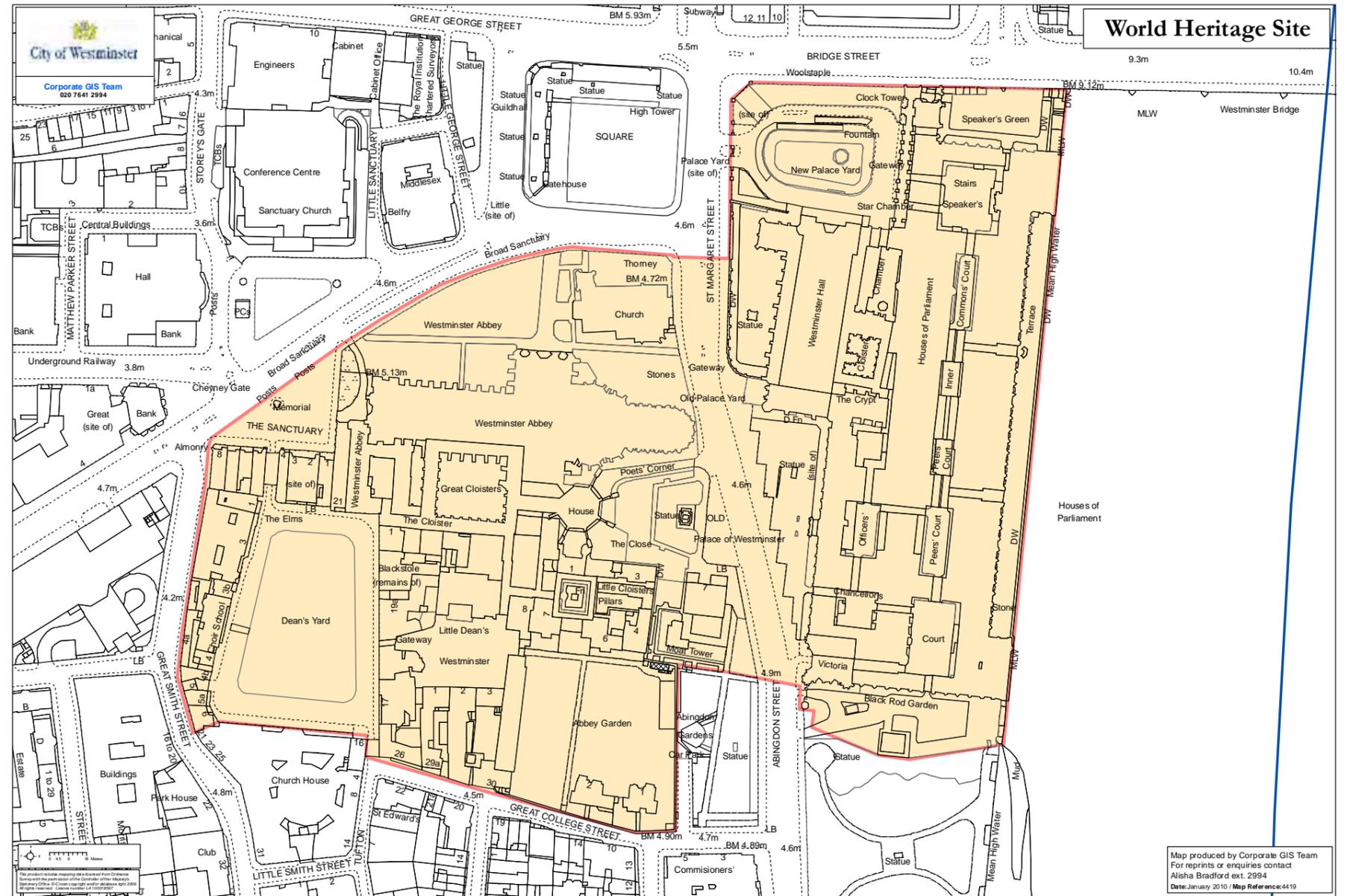
1:5,000 @ A3

Figure 5.1 Heritage Receptor Plan

▲ North

*Contribution of setting to heritage value*

- 5.17 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.”*
- 5.18 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, as recognised at **Section 9.0**. 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.
- 5.19 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.
- 5.20 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.
- 5.21 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.



**Figure 5.1** Plan of the Westminster World Heritage Site

### Registered Park and Garden

#### Victoria Tower Gardens (grade II)

- 5.22 The Victoria Tower Gardens were added to the Register of Parks and Gardens of special historic interest in 1987.
- 5.23 The park takes its name from Parliament's Victoria Tower, which is part of the House of Lords. In its present form, the garden was created in five main phases, dating to c. 1874, 1880-1881, 1910-1914, 1956-1959, and 2013-2015. A comprehensive account of the gardens' historical development is given at **Section 4.0**.
- 5.24 The park contains a number of listed monuments, including Rodin's Burghers of Calais (grade I), the Buxton Memorial Fountain (grade II\*) and a statue of Emmeline Pankhurst (grade II). It also encompasses part of the listed Victoria Embankment.
- 5.25 Recent changes to the park have included alterations to the playground and the construction of the Parliamentary Education Centre in the northern part of the garden, which was granted temporary consent (for ten years) in 2015.
- 5.26 The gardens possess historic interest for its piecemeal development, and as an important area of partially reclaimed land adjacent to the Westminster World Heritage Site.
- 5.27 The receptor is of **Medium** value.
- Contribution of setting to heritage value*
- 5.28 The park is broadly triangular in shape, bordering the River Thames to the east, Millbank to the west, and the Black Rod Garden and the Palace of Westminster to the north.
- 5.29 The Victoria Tower, for which the garden is named, is a dominant element in its setting and makes a positive contribution to the character of the open space. The proximity to the Palace of Westminster and the open space of the river define the park, and create a quiet, spacious enclave within the densely urban environment within central London.

### Conservation Areas

#### Westminster Abbey and Parliament Square Conservation Area (CoW)

- 5.30 Westminster Abbey and Parliament Square Conservation Area was first designated as part of the Government Precinct Conservation Area in 1969, and later re-designated in 1987 under its present name. The Conservation Area includes the Application Site.
- 5.31 The character of the Conservation Area is indivisible from its long evolution, spanning 1,000 years. It contains a large number of national landmarks, including the Palace of Westminster and Westminster Abbey, as well as one of the busiest traffic and pedestrian areas in the city. Towards the south and east are quieter, more enclosed spaces, including some of the semi-private spaces, such as Dean's Yard which form part of Westminster Abbey and Westminster School. These retain their medieval layout, and have an entirely different character from the CA as a whole.
- 5.32 The CA retains its historic street layout, which has developed piecemeal over a number of centuries, shaped by a range of factors including the route of the River Tyburn, patterns of historic land ownership, and widening of historic roads during the Victorian period. Parliament Square, to the north, forms a spacious setting for the arrangement of historic buildings along its perimeter, and allows their group value to be appreciated.
- 5.33 In the south east of the Conservation Area, the Victoria Tower Gardens forms an important open space within the urban environment. The linear form of the gardens and dense tree line channels views north towards the Victoria Tower, and forms the setting of a number of monuments which are included on the statutory list.
- 5.34 The heritage value of this Conservation Area is **High**.
- Contribution of setting to heritage value*
- 5.35 The CA has a densely urban setting which comprises a mix of modern and historic buildings. To the south and west is the Smith Square Conservation Area, with a large number of government buildings along Millbank. To the east, the River Thames provides an open space, allowing for intervisibility between the buildings within the CA, and those on the Albert Embankment, including Lambeth Palace (grade I). This makes a positive contribution to its heritage value and appreciation.

#### Smith Square Conservation Area (CoW)

- 5.36 The Smith Square Conservation Area has a mixed character, derived from its commercial and residential development focussed on Smith Square at its core. To the east, Millbank covers an area of the river embankment to the south of Lambeth Bridge.
- 5.37 The character of the Smith Square CA results from its underlying medieval street pattern, and irregular, formal 18th century development in adherence. The focal point of the Conservation Area is Smith Square, which is dominated by the former Church of St John the Evangelist at its centre, and forms the focal point of views from the surrounding streets.
- 5.38 The value of this Conservation Area is **Medium**.
- Contribution of setting to heritage value*
- 5.39 The Conservation Area has a mixed setting, comprised of the Westminster World Heritage Site to the north-east, the river to the east, and mixed residential and commercial development to the south and west. Views out towards Millbank are oblique, and views into the Victoria Tower Gardens are screened by the line of mature trees along the boundary, though the open character of the space contrasts positively with the dense, urban structure within the CA.
- 5.40 The inward-focussed nature of the Conservation Area means that the setting makes a limited contribution to its character and appearance.
- #### Albert Embankment Conservation Area (LBL)
- 5.41 The Albert Embankment Conservation Area was first designated in 2001, and the boundaries amended to reach their present extent in 2016.
- 5.42 The CA runs along Lambeth's Thames frontage from the borough boundary with Wandsworth to Westminster Bridge, and includes the embankment walk and retaining walls, and the significant St Thomas' Hospital complex. The CA has a number of public vantage points from which to view the Westminster World Heritage Site.
- 5.43 Architecturally, the Conservation Area has a disparate character, comprising a range of new development along the historically important Albert Embankment, an important, major piece of mid-Victorian engineering and urban planning which occupies a prominent central London position along the river.

5.44 Set back from the river frontage are larger areas of 19th century industrial buildings, and St Thomas' Hospital campus is a notable presence to the north.

5.45 The CA is characterised by the historic Albert Embankment and riverscape, with some significant historic buildings.

5.46 The value of this Conservation Area is **Medium**.

*Contribution of setting to heritage value*

5.47 The CA has a mixed setting, comprised of a range of poor quality post-war buildings on the Lambeth side of the river, the grade I listed Lambeth Palace complex to the south, and the open space of the river to the east, which has a strong influence on the character of the embankment walk. This allows wide views towards the Westminster World Heritage Site and other Conservation Areas, including Millbank. These give the Conservation Area importance through its contribution to the setting and appreciation of London's heritage assets along the River Thames. As such, views towards the Palace of Westminster and the WHS are considered noteworthy, as well as those of the Millbank Tower and Tate Gallery further south.

**Lambeth Palace Conservation Area (LBL) Listed Buildings**

5.48 The Lambeth Palace Conservation Areas was first designated in 1968, and subsequently extended a number of times. It reached its present extent in 2016.

5.49 The Conservation Area comprises the medieval complex of buildings at Lambeth Palace. The CA includes the Garden Museum (formerly the Church of St Mary) and a number of open spaces, including the large, private garden of Lambeth Palace, the public Archbishop's Park, the smaller, historic burial ground of Old Paradise Gardens and the historic churchyard to the former Church of St Mary.

5.50 The CA is set adjacent to the river, with intervisibility across to the north bank. It is adjacent to the Westminster World Heritage Site, with which the palace has strong historical connections, and the intervisibility between the two contributes to the heritage value of both.

5.51 The value of this Conservation Area is **High**.

*Contribution of setting to heritage value*

5.52 The Lambeth Palace CA Appraisal notes the significance of the constitutional and physical relationship between the buildings within the CA and the Palace of Westminster. The river facilitated quick transport between the two, and their visual relationship allows for an appreciation of this important proximity.

5.53 The Victoria Tower Gardens make a positive contribution to views toward the WHS from the CA.

**Listed Buildings within the Victoria Tower Gardens**

*Statuary Group of the Burghers of Calais (grade I)*

5.54 The Statuary group of the Burghers of Calais ('Les Bourgeois de Calais') was added to the statutory list in 1970.

5.55 The sculpture commemorates an event from the Hundred Years' War (1337-1453), comprising a bronze group of figures on a stone pedestal, erected in 1915 by Auguste Rodin. The history of its presentation in the park is discussed at **Section 4.0**.

5.56 The statue has historic and architectural (design) significance as a notable work by Rodin, and one of only twelve casts in the world.

5.57 The value of this receptor is **High**.

*Contribution of setting to heritage value*

5.58 The immediate setting of the receptor comprises the Victoria Tower Gardens, and the Houses of Parliament, which are in close proximity to the north. The statuary group is best experienced in views from the south, in which its heritage value can be appreciated in conjunction with the governmental buildings.

5.59 The hard standing around the receptor allows for its appreciation by pedestrians, as does its location close to the northern entrance to the park space.

5.60 The open character of the northern part of the park contributes to the appreciation of the receptor. In longer views, the scale of the sculpture limits the opportunity for its appreciation.

*Statue of Mrs Emmeline Pankhurst (grade II)*

5.61 The Statue of Mrs Emmeline Pankhurst was added to the statutory list in 1970.

5.62 The statue was sculpted by AG Walker and erected in 1930, before being moved to its present location in 1956. It depicts the women's suffrage leader in bronze, on a stone pedestal with side screens.

5.63 The statue possesses historic and architectural interest as a commemorative work depicting a notable historical figure, and as an attractive sculpture which makes a positive contribution to the Victoria Tower Gardens.

5.64 The value of this receptor is **Medium**.

*Contribution of setting to heritage value*

5.65 The receptor has a setting defined by dense hedge boundaries to the west, creating an enclave close to the entrance to the park within which it is appreciated. The busy footpath close to the east of the receptor contributes to its appreciation by a large number of people passing through parliament. Owing to the historic interest of the receptor, the proximity to Parliament is an important element in its setting, which makes a positive contribution to its setting.

5.66 The wider Victoria Tower Gardens does not meaningfully contribute to the heritage value of the receptor, as part of the wider area in which it is experienced.

*River Embankment from the Houses of Parliament to Lambeth Bridge (grade II)*

5.67 The River Embankment was added to the statutory list in 1987. It comprises the 19th century embankment wall, with mooring rings and weather coped parapet.

5.68 The embankment possesses historic and architectural interest as part of the Victorian alterations to this part of the river bank, and forms an intrinsic part of the riverside experience in this part of London.

5.69 The value of this receptor is **Medium**.

- Contribution of setting to heritage value*
- 5.70 The setting of the receptor comprises two differing elements; the open space of the river, which allows for wide views across to the south bank, and the Victoria Tower Gardens to the west, the extent of which are defined by the receptor.
- 5.71 This contrast between the open space of the river and the contained gardens space makes a positive contribution to the appreciation of the receptor. There is a strong historical relationship between the Victoria Tower Gardens and the embankment by virtue of their establishment and original development, though this is not obvious to the casual visitor.
- Buxton Memorial Fountain, Victoria Tower Gardens (grade II\*)*
- 5.72 The Buxton Memorial Fountain was added to the statutory list in 1970 and is located within the Westminster and Abbey and Square and Conservation Area and Victoria Tower Gardens (a Grade II Registered Park and Garden).
- 5.73 The memorial is an octagonal structure in a gothic style, designed by SS Teulon and Charles Buxton MP (son of Sir Thomas Buxton) in 1865. The memorial commemorates the emancipation of slaves in Britain in 1834, and originally had statuettes (since lost) of British and English rulers: Caractacus, the Emperor Constantine, Canute, King Alfred, William the Conqueror, Henry VII, Charles I and Queen Victoria. The metal figures, by T. Earp, which once stood at eaves level, were stolen in 1960 and 1971. These were recast in 1980, but have since disappeared.
- 5.74 The construction of the fountain and its waterworks was undertaken by the Metropolitan Drinking Fountain Association. It was originally erected in Parliament Square circa February 1866, but was removed from its original position in 1949, when the Government redeveloped Parliament Square to Grey Warnum's new layout in preparation for the Festival of Britain. The list description notes that "the fanciful Gothic design of the fountain had few admirers".
- 5.75 In December 1949, it was established through a condition of the removal of the fountain from Parliament Square that it should be re-erected in the vicinity. The site for relocation was debated in the Commons in November 1955, when the Minister of Works emphasised that the Anti-Slavery Society had originally wanted it to stand near Parliament. The Ministry of Works proposed to re-erect the fountain in Victoria Tower Gardens.
- 5.76 Finally, it was placed in the Victoria Tower Gardens in 1957. It has since been restored in 1980, and more recently by Royal Parks in 2007. The present location of the statue is not the original one, and there is limited significance to the present location beyond its association with Parliament. The relatively isolated location of the statue restricts its exposure to visitors.
- 5.77 The fountain possesses historic and architectural interest as a good example of a memorial associated with Parliament, and as a work by SS Teulon.
- 5.78 The value of this receptor is **High**.
- Contribution of setting to heritage value*
- 5.79 The Buxton Memorial is situated within the Victoria Tower Gardens, towards the eastern, or river side. Its setting is defined primarily by the space within the park, bounded by dense tree belts east and west. There is a small interpretation board to the east of the monument, which gives an overview of its heritage value.
- 5.80 The proximity to parliament, the forum in which the 1833 Slavery Abolition Act was enacted, is an important part of its setting, and the Gothic detailing of the memorial responds to that of the towers.
- 5.81 The convergence of paths around the monument contributes towards a transient experience, whereby visitors move past and around the memorial whilst traveling through the park.
- 5.82 The open space of the park allows the attractive form and detailing of the memorial to be appreciated. From the east, there are some partial views of the monument along Dean Stanley Street, which is on an axis to Smith Square.
- 5.83 The setting of the receptor makes a mixed contribution to its heritage value. Its location close to Parliament contributes to its historic interest, though appreciation of the monument's purpose is limited by its placement at the convergence of paths within the park, which inadvertently places the memorial as the central feature of a pedestrian traffic island.
- Listed Buildings within the Westminster World Heritage Site*
- Houses of Parliament and the Palace of Westminster (grade I)*
- 5.84 The Houses of Parliament and Palace of Westminster were designated in 1970. They are of exceptional heritage value owing to their piecemeal architectural development spanning almost 900 years, and historical interest as the seat of government.
- 5.85 Westminster Hall forms the earliest part of the building, and was first constructed between 1097 and 1099. Later alterations include remodelling between 1394-1401 by Henry Yevele and Hugh Herland.
- 5.86 St Stephen's Chapel dates from circa 1292-1297, with later alterations in 1320 and the associated cloister and chantry chapel built between 1526 and 1529.
- 5.87 The Houses of Parliament were built later, in a sympathetic style, in the early 19th century.
- 5.88 The value of this receptor is **High**.
- Contribution of setting to heritage value*
- 5.89 The setting of the receptor comprises the busy traffic interchange and RPG at Parliament Square to the west, the open space of the Thames to the east, and Victoria Tower Gardens to the south. As recognised in LVMF views, the receptor is widely visible in river views, which make a positive contribution to its setting. The adjacent buildings within the WHS, including Westminster Abbey and St Margaret's Church, make a positive contribution to the setting of the receptor, and reinforce its role as the centre of government.
- 5.90 The Victoria Tower Gardens forms an important open space within the setting of the receptor. The linear form of the gardens and dense tree line channels views north towards the Victoria Tower, which allow for an appreciation of the heritage value of the building.

*Westminster Abbey (grade I)*

- 5.91 Westminster Abbey was designated in February 1958. It was first built as Edward the Confessor's Church circa. 1050-1065, before rebuilding under Henry III in 1245. The building underwent subsequent extensions during the 13th and 14th centuries, with later additions including the Henry VII Chapel circa 1503, and 18th and 19th century restorations by Wren, George Gilbert Scott and others, whose contributions add to the exceptional architectural value of the building.
- 5.92 The church is built in Reigate stone in a geometric gothic style, with an aisled 11 bay nave. Some 13th century fragments of stained glass survive, though the majority date from the 15th century onwards. These contribute to the building's considerable historical value.
- 5.93 The listing description describes the Abbey as "a unique embodiment of church, state and crown, and national mausoleum." It has exceptional historical and architectural value, and forms a key constituent part of the Westminster World Heritage Site.
- 5.94 The value of the receptor is Exceptional.
- Contribution of setting to heritage value*
- 5.95 The receptor is set on the south side of Parliament Square, separated from Broad Sanctuary by an area of defined open space which allows for its appreciation in views from the north.
- 5.96 The Houses of Parliament and St Margaret's Church are important elements in the setting of the receptor, which contribute to the collection of nationally important ecclesiastical and governmental buildings focussed on Parliament Square.
- 5.97 To the south, the range of cloisters and ancillary buildings contribute to the heritage value of the whole, and form part of the ensemble of structures and buildings designated as the Westminster World Heritage Site.
- 5.98 These elements make a positive contribution to the setting of the receptor.
- 5.99 Whilst the Victoria Tower Gardens does not form part of the immediate experience of the receptor, there are a number of important views which take in the dense tree line of the park in conjunction with the uppermost parts of the Abbey, and the Houses of Parliament, and thus is experienced in the setting of the receptor, making a limited contribution to the appreciation of its heritage value.

*Victoria Tower Lodge and Gates to Black Rod Garden (grade I)*

- 5.100 The Victoria Tower Lodge and Gates to Black Rod Garden were designated in 1987. They form the entrance to Black Rod Garden, adjacent to the Palace of Westminster, which lies to the north, and date from circa 1850-1860, as part of the designs for the Palace of Westminster created by AWN Pugin and Sir Charles Barry.
- 5.101 The lodge has an octagonal footprint, and comprises one storey with a pointed arched doorway and cusped lancet lights. The gate piers are also octagonal, with Gothic ironwork to the gates.
- 5.102 The value of this receptor is High.
- Contribution of setting to heritage value*
- 5.103 The setting of the Lodge and Gates is contained within the busy frontage to Abingdon Street, which forms a popular tourist thoroughfare. The dense tree line surrounding Victoria Tower Gardens limits views of the park and lodge, but the contrast between the busy, urban environment of Abingdon Street and the landscaped open space beyond makes a positive contribution to the setting of the receptor.
- The Church Commissioners (grade II\*)*
- 5.104 The Church Commissioners was added to the statutory list in 1970, and comprises a 1903 island block of offices by WD Caroe, built in red brick with Portland Stone dressings.
- 5.105 The building has 5-6 storeys with two tiers of dormer windows to the attics, and incorporates details of Free Style northern Renaissance design, including Plateresque motifs and staircase fenestration.
- 5.106 The building possesses historic and architectural interest as a good example of an attractive early 20th century office building by a recognised architect.
- 5.107 The value of this receptor is **High**.
- Contribution of setting to heritage value*
- 5.108 The Church Commissioners is situated on the west side of Millbank, immediately south of Abingdon Street Gardens and Great College Street. The building has a busy, city centre setting, with heavy traffic along Abingdon Street/ Millbank and to the north at Parliament Square.

- 5.109 Along Millbank, tree planting screens views towards the receptor from within the Victoria Tower Gardens, though it appears as an attractive feature in the streetscape which contributes to the ensemble of historic buildings in this part of Westminster. The proximity to the open space at Abingdon Street Gardens and Victoria Tower Gardens makes a positive contribution to its appreciation and relief from its primarily urban setting.

*9 Little College Street*

- 5.110 9, Little College Street was added to the statutory list in 1970, and comprises a terraced house dating from circa 1722, later refaced circa 1900.
- 5.111 The building is of three storeys in red brick, with a polychromatic brick rear to Cowley Street.
- 5.112 The building possesses historic and architectural interest as a good example of a house of this period, and as part of the 'exceptionally well preserved' enclave of 18th century housing in the vicinity.
- 5.113 The value of this receptor is **High**.
- Contribution of setting to heritage value*
- 5.114 9 Little College Street is situated to the west of Millbank, and north of Great Peter Street, within an area of dense urban development. College Green to the west provides relief from the urban environment, and makes a positive contribution to its setting, as do the surrounding red brick buildings.
- 5.115 There are some views along Great Peter Street towards the Victoria Tower Gardens which take in the receptor, and make a limited contribution to the appreciation of its heritage value.

### Listed Buildings at Smith Square

#### *St John's Smith Square Concert Hall (grade I)*

5.116 The Concert Hall, formerly the Church of St John the Evangelist, was first designated in February 1958. It was built as a parish church by Thomas Archer in 1713-1728, with later refurbishment following fire damage in 1742, Second World War damage and restoration by Marshall Sisson from 1965-1968.

5.117 The building is Portland Stone in the Baroque style, with giant Venetian windows to the east and west end.

5.118 The building derives its special historic and architectural interest from its role as "the climax of the exceptionally well preserved early 18th century enclave comprising the north side of Smith Square and Lord North, Barton and Cowley Streets."

5.119 The value of this receptor is **High**.

#### *6, 7-9 Smith Square SW1 (grade II\*)*

5.120 These receptors lie on the north side of Smith Square, and form part of Sir James Smith's development of the square in 1726, built in brown brick with red brick dressings over three storeys.

5.121 They possess intrinsic historic and architectural interest as houses of this date, and as part of the 18th century enclave of development which also includes Lord North, Barton and Cowley Streets, which collectively make a positive contribution to the setting of the buildings.

5.122 The value of these receptors is High.

#### *Lampstandard numbered G1 on corner of Smith Square (grade II), 7 Lampstandards numbered G4, 5 and 6 and G9, 10, 11 and 12 (grade II), Lampstandard numbered G1 on corner of Smith Square (grade II)*

5.123 These Lampstandards were added to the statutory list in 1987, and possess historic and architectural (design) interest as mid-19th century cast iron lamp standards which form part of a group within the Smith Square layout.

5.124 The value of these receptors is Medium.

### *2 Bollards flanking junction of Smith Square and Lord North Street (grade II)*

5.125 The two bollards were added to the statutory list in 1970, and comprise a pair of 1720-1725 chamfered, conical shape bollards on the curb edge.

5.126 The bollards possess historic and architectural interest as part of the early 18th century street furniture.

5.127 The value of the receptor is **Medium**.

### *13 stone bollards on pavement curb surrounding St John's Smith Square Concert Hall (grade II)*

5.128 These receptors were added to the statutory list in 1987, and form part of Sir James Smith's original layout of the square. They are built in Portland stone, with a tapered octagonal form.

5.129 The bollards possess historic and architectural interest as part of the early 18th century street furniture.

5.130 The value of the receptor is **Medium**.

#### *Contribution of setting to heritage value*

5.131 The immediate setting of these buildings is defined by the planned arrangement at Smith Square, which provides a contemporaneous and sympathetic backdrop against which the landmark quality of the former St John's Church can be appreciated. Views towards these receptor are predominantly contained within the planned layout of the square.

5.132 The space outside of this planned arrangement makes a limited contribution to the appreciation of receptors' heritage value. The busy traffic thoroughfare along Millbank to the east contributes to the sense of a city centre location, and the dense tree boundaries within the Victoria Tower Gardens provide relief.

### Listed Buildings at St Thomas' Hospital and Albert Embankment

#### *Bronze statue of Edward VI at north entrance to ward block of north wing at St Thomas' Hospital (grade II\*)*

5.133 This statue was designated in 1979, and cast by Scheemakers in 1736. It features a figure in period costume on a tall plinth, and was erected at St Thomas' in 1870. It possesses historic and architectural (design) value as a well-preserved bronze work by Scheemakers.

5.134 The value of this receptor is High.

#### *Statue of Robert Clayton at North Entrance to Ward Block of North Wing at St Thomas' Hospital (grade I)*

5.135 The statue was designated in 1979. It was created by Grinling Gibbons in 1714, with a Latin inscription on the plinth describing Clayton's role as President and benefactor at the hospital. The statue was moved to its current position along Lambeth Palace Road circa 1870. It possesses historic and architectural (design) interest as a notable work by Gibbons, and for its association with Robert Clayton.

5.136 The value of this receptor is High.

#### *South wing at St Thomas' Hospital excluding post-1926 courtyard infill buildings (grade II)*

5.137 The South Wing was added to the statutory list in 1973, and comprises a red Fareham brick hospital building, constructed between 1868 and 1871 by Henry Currey, Architect and Surveyor to the Hospital, and later altered in the early 20th century.

5.138 The building possesses historic and architectural interest as the grandest of English pavilion- plan hospitals, deliberately designed to take advantage of its position on the south bank, opposite the Palace of Westminster. It also derives some special interest from its group value with the former Medical School.

5.139 The value of this receptor is Medium.

*Block 9 of St Thomas' Hospital Medical School (grade II)*

- 5.140 Block 9 of St Thomas' Hospital Medical School was added to the statutory list in 1979, and comprises an Italianate style two storey building dating from circa 1870, built by Henry Currey. It has a red brick exterior with Portland stone quoins, and a tower with deep windows.
- 5.141 The building possesses historic and architectural interest as a good example of an 1870s medical school building, and as part of the historic St Thomas' Hospital complex.
- 5.142 The value of this receptor is Medium.

*Fifteen Public Benches on Embankment footpath between Lambeth Bridge and Westminster Bridge (grade II)*

- 5.143 The fifteen public benches were added to the statutory list in 1981, and comprise a set of 19th century benches, with a cast iron centre and end supports, and ornamental open-work panels and arms in the shape of swans.
- 5.144 The benches possess historic and architectural (design) interest as part of the 19th century street furniture in the locality, and as well-designed public seating which makes a positive contribution to the street scene.
- 5.145 The value of this receptor is Medium.

*Wall along western boundary of St Thomas' Hospital (grade II)*

- 5.146 The wall was added to the statutory list in 1981, and comprises a mid to late 19th century Portland stone wall with a high roll-moulded plinth, flat buttresses and a cornice.
- 5.147 It possesses historic and architectural (design) interest as part of the historic St Thomas' Hospital complex, and as an attractive boundary treatment which makes a positive contribution to the street scene.
- 5.148 The value of this receptor is Medium.

*K6 telephone Kiosk, Lambeth Palace Road/ Albert Embankment (grade II)*

- 5.149 This K6 kiosk was added to the statutory list in 1987, and conforms to a type designed by Giles Gilbert Scott in 1935. It is built in cast iron, in square form with a domed roof and unperforated crowns to the top panels.
- 5.150 The kiosk possesses historic and architectural (design) interest as a kiosk conforming to a recognised type by Scott, and as an attractive part of the street furniture in the locality.

*Contribution of setting to heritage value*

- 5.151 This group of receptors is situated on the 'south' bank of the river, to the east of the Site. Their setting primarily comprises the tree-lined river embankment, and the open space of the Thames to the east, which provides an open vista towards the western bank and the wider skyline. The Palace of Westminster is a prominent feature in the setting of the receptors, and the benches in particular are arranged to afford views towards the landmark buildings.
- 5.152 This setting makes a positive contribution to the receptors and their appreciation as part of the city centre streetscene.

*Listed Buildings at Millbank/ Abingdon Street**Knife Edge two piece sculpture (grade II\*)*

- 5.153 The Knife Edge two piece sculpture was added to the statutory list in 2016.
- 5.154 The sculpture was created between 1962 and 1964 and erected in 1967, by Henry Moore. It comprises a bronze work of interlocking forms, created by one of the most influential sculptors of the 20th century. It sits upon a concrete, granite faced pedestal, and was created as a substantial gift to the nation from the Contemporary Art Society, and Moore himself.
- 5.155 The sculpture possesses historic and architectural (design) interest as a work by a sculptor of note, and aesthetic value for its contribution to the street scene.
- 5.156 The value of this receptor is High.

*Norwest House (grade II)*

- 5.157 Norwest House was added to the statutory list in 1981, and comprises an office block built in 1928 to designs by Sir F Banes, as part of a uniform composition with nearby Thames House.
- 5.158 The building has five storeys in Portland stone, with a 27-bay range and a four storey attic. The exterior elevations are adorned with sculpted figures by Jagger and a Classical manner.
- 5.159 The building possesses historic and architectural interest as an office building by Banes, and as part of planned composition with nearby Thames House.
- 5.160 The value of this receptor is Medium.

*Millbank Tower (grade II)*

- 5.161 Millbank Tower was added to the statutory list in 1995, and comprises a tower office building constructed by Roland Ward and Partners in 1959-1963, as the Vickers Tower. The building has 32 storeys, and was briefly the tallest building in London. It has a reinforced concrete frame with glass curtain walling and stainless steel mullions.
- 5.162 The building possesses historic and architectural interest as an elegant tower with a distinctive form, and as one of the earliest tall buildings in London.
- 5.163 The value of this receptor is Medium.

*Thames House (north and south blocks with bridge link) (grade II)*

- 5.164 Thames House was added to the statutory list in 1981, and comprises two blocks of office accommodation with a link bridge between. The building was constructed in 1928 to designs by Sir F Banes, and has five storeys with a three storey attic and entablature to the first floor.
- 5.165 The building possesses historic and architectural interest as a good example of a 1920s office block by a known architect, which has some group value with Norwest House.
- 5.166 The value of this receptor is Medium.

*Contribution of setting to heritage value*

- 5.167 These receptors are situated along Millbank and Abingdon Street, and their setting comprises the range of office buildings along Millbank, the open space of the road, Victoria Tower Gardens North and South, and the River Thames, which affords wide ranging views of built form on the opposite bank. The Knife Edge Two Piece Sculpture has an immediate setting defined by the open space at Abingdon Street Gardens, which contributes to its appreciation.
- 5.168 Lambeth Bridge forms a dividing feature in the receptor's setting, and separates this part of Millbank from the Victoria Tower Gardens (north) and core of civic Westminster to the north.
- 5.169 The leafy character of the Victoria Tower Gardens makes a positive contribution to the receptor's setting.

Map Ref	Name	Grade	Heritage Value	Full Assessment Required
World Heritage Sites				
106	Palace of Westminster, Westminster Abbey and St Margaret's Church World Heritage Site	N/A	Exceptional	Yes
Listed Buildings				
1	Victoria Tower Lodge and gates to Black Road Garden	I	High	Yes
2	Statuary group of the Burgurers of Calais	I	High	Yes
3	The Great Cloisters, including St Faiths Chapel, The Chapter House, The Parlour, Nos. 1 and The Cloisters, The Dark Cloisters and Dormitory with the Chapel of St Dunstan (School for Busby Library)	I	High	No
4	Little Deans Yard	I	High	No
5	Little Deans Yard (College of Westminster School)	I	High	No
6	Little Deans Yard Staircase to Doorway and Gateway to School and Busby Library	I	High	No
7	The Deanery and Sub Dean's Residence with The Jericho Parlour	I	High	No
8	Dean's Yard	I	High	No
9	Lambeth Palace	I	High	No
10	Little Deans Yard Ashburnham House	I	High	No
11	Dean's Yard	I	High	No
12	19, 19a and 20, Broad Sanctuary SW1	I	High	No
13	The Jewel House (or Tower) of the Palace of Westminster and former dock retaining walls to moat around Jewel House	I	High	No
14	Houses of Parliament the Palace of Westminster	I	High	Yes
15	Church of St Margaret Westminster	I	High	No
16	St John's Smith Square Concert Hall	I	High	Yes
17	Gates, Railings, Gate Piers to New Palace Yard, Houses of Parliament	I	High	No
18	Westminster Abbey (The Collegiate Church of St Peter)	I	High	Yes
19	Statue of Robert Clayton at north entrance to ward block of north wing of St Thomas' Hospital	I	High	Yes
20	Clerk of the Works Office and The Remains of the Chapel of St Catherine Little Cloisters Lodgings	I	High	No
21	Abbey Precinct Wall	I	High	No
22	Buxton Memorial Fountain, Victoria Tower Gardens	II*	High	Yes
23	9 and 10-14, Barton Street SW1	II*	High	No

Map Ref	Name	Grade	Heritage Value	Full Assessment Required
24	Bronze Statue of Edward VI at North Entrance to Ward Block of North Wing at St Thomas' Hospital	II*	High	Yes
25	Church of St Mary	II*	High	No
26	Tomb of William Sealy in St Mary's Churchyard, Tomb of St John Tradescant and his family in St Mary's Churchyard and Tomb of Admiral Bligh in St Mary's Churchyard	II*	High	No
27	16-19 Great College Street SW1	II*	High	No
28	1-3, 13-19 Cowley Street SW1	II*	High	No
29	13-19 Lord North Street	II*	High	No
30	Middlesex Guildhall	II*	High	No
31	6-9 Smith Square SW1	II*	High	Yes
32	Ninth Church of Christ Scientist	II*	High	No
33	1 and 2, 3 - 5, Smith Square SW1	II*	High	Yes
34	Number 7 (including Former No. 6)	II*	High	No
35	The Church Commissioners	II*	High	Yes
36	Numbers 2, 3, 5, 7, 8, 10 and 11, Lord North Street	II*	High	No
37	9, Little College Street, SW1	II*	High	Yes
38	1, 3-6 Barton Street, SW1	II*	High	No
39	Knife Edge Two Piece Sculpture	II*	High	Yes
40	Rogers House	II	Medium	No
41	Number 83 and Gate Piers Between Rogers House and Tothill House	II	Medium	No
42	5 Lamp Standards Lettered G	II	Medium	No
43	Little Deans Yard Turle's House	II	Medium	No
44	Abbey (Canons') Garden 4 Statues	II	Medium	No
45	Abbey Precinct Railings to West of Abbey and to East End and Abbey Close	II	Medium	No
46	8, Barton Street SW1	II	Medium	No
47	36-40 Great Smith Street SW1	II	Medium	No
48	"Number 22 including The Chapel of St Peter and St John St Edward's House including St Edward's Chapel"	II	Medium	No
49	17-21 Gayfere Street SW1	II	Medium	No
50	Lampstandard Numbered G1 on corner of Smith Square	II	Medium	No
51	2 and 4 Dean Trench Street SW1	II	Medium	No

Map Ref	Name	Grade	Heritage Value	Full Assessment Required
52	Block 9 of St Thomas's Hospital Medical School	II	Medium	Yes
53	'Lambeth Palace Cottages Wall to East of Lambeth Palace Courtyard	II	Medium	No
54	Fifteen Public Benches on Embankment Footpath between Lambeth Bridge and Westminster Bridge	II	Medium	Yes
55	Wall to West of the Great Hall at Lambeth	II	Medium	No
56	Wall along Western Boundary of St Thomas' Hospital	II	Medium	Yes
57	Gayfere Lodge, 7, Gayfere Street SW1, 10 and 11, Gayfere Street SW1	II	Medium	No
58	Orchard House	II	Medium	No
59	Park House	II	Medium	No
60	Abbey (Canons') Garden	II	Medium	No
61	10-12, Little College Street SW1 and Lampstandard Numbered G1	II	Medium	No
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	II	Medium	Yes
63	Norwest House	II	Medium	Yes
64	Statue of George V	II	Medium	No
65	Statue of Richard I	II	Medium	No
66	Statue of Oliver Cromwell in front of Westminster Hall	II	Medium	No
67	St Margaret's Churchyard Railings, Obelisks and Bollards	II	Medium	No
68	14 Lamp standards flanking Carriage Drive in New Palace Yard, Houses of Parliament	II	Medium	No
69	6 Lamp standards in St Margaret's Churchyard lettered G	II	Medium	No
70	Thorney House	II	Medium	No
71	36 and 37, Smith Square SW1	II	Medium	No
72	Millbank Tower	II	Medium	Yes
73	57 and 57a, Tufton Street	II	Medium	No
74	K6 Telephone Kiosk, Lambeth Palace Road/ Albert Embankment	II	Medium	Yes
75	Millicent Fawcett Hall	II	Medium	No
76	Monument to Christopher Cass The Elder on East Side of St John's Gardens	II	Medium	No
77	Number 90 including Railings	II	Medium	No
78	Church House	II	Medium	No
79	7 Lampstandards Numbered G4, 6 and 6 and G9, 10, 11 and 12	II	Medium	Yes

Map Ref	Name	Grade	Heritage Value	Full Assessment Required
80	Statue of Abraham Lincoln in front of Middlesex Guildhall	II	Medium	No
81	Thames House (North and South Blocks with Bridge Link)	II	Medium	Yes
82	Westminster Public Library	II	Medium	No
83	Morland House, Millbank Estate	II	Medium	No
84	Corner House	II	Medium	No
85	Church of St Matthew and St Matthew's Clergy House	II	Medium	No
86	Lampstandard Numbered G1 on Corner of Smith Square	II	Medium	Yes
87	4, Cowley Street SW1	II	Medium	No
88	The Sanctuary	II	Medium	No
89	1 and 3, Dean Trench Street SW1	II	Medium	No
90	North House and Gayfere House	II	Medium	No
91	62 and 64, Horseferry Road SW1	II	Medium	No
92	Little Deans Yard	II	Medium	No
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	II	Medium	No
94	Crimean War and Indian Mutiny Memorial	II	Medium	No
95	Faith House	II	Medium	No
96	River Embankment from the Houses of Parliament to Lambeth Bridge	II	Medium	Yes
97	Statue of Mrs Emmeline Pankhurst	II	Medium	Yes
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)	II	Medium	No
99	South Wing at St Thomas' Hospital excluded post-1926 Courtyard Infill Buildings	II	Medium	Yes
100	Wall on south side of Main Courtyard at Lambeth Palace	II	Medium	No
101	Mounting block to east of entrance to Lambeth Palace Residential Apartments	II	Medium	No
102	Walls, railings, gates and gate piers to south and west of Church of St Mary	II	Medium	No
103	Mary Sumner House	II	Medium	No
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	II	Medium	No

Map Ref	Name	Grade	Heritage Value	Full Assessment Required
105	Lambeth Bridge and attached parapets, light standards, associated walls to approaches and obelisks	II	Medium	No
Scheduled Monuments				
107	The Chapter House and Pyx Chamber in the Abbey Cloisters, Westminster Abbey	N/A	High	No
108	The Jewel Tower	N/A	High	No
Registered Parks and Gardens				
109	Parliament Square	N/A	High	No
110	Victoria Tower Garden	N/A	High	Yes
111	Lambeth Palace	N/A	High	No
Conservation Areas				
A	Whitehall CA (WCC)	N/A	Medium	No
B	Westminster Abbey and Parliament Square (WCC)	N/A	High	Yes
C	Smith Square (WCC)	N/A	High	Yes
D	Millbank (WCC)	N/A	Medium	No
E	Albert Embankment (LBL)	N/A	Medium	Yes
F	Lambeth Palace (LBL)	N/A	High	Yes



// NATIONAL HOLOCAUST MEMORIAL



Baseline: Townscape and Visual

## 6.0 BASELINE: TOWNSCAPE AND VISUAL

6.1 The following section provides an analysis of townscape character areas in the vicinity of the Site. The section also identifies the viewpoints from which the Proposed Development has been assessed.

### Townscape

6.2 The townscape including and surrounding the Site may be categorised into ten distinct areas. These broadly comprise civic, commercial and residential areas. For the purposes of this assessment the character areas are referred to as:

- **Character Area 1:** Victoria Tower Gardens;
- **Character Area 2:** Westminster World Heritage Site and Parliament Square;
- **Character Area 3a:** Millbank;
- **Character Area 3b:** Victoria Tower Gardens South;
- **Character Area 4:** The River Thames;
- **Character Area 5:** St Thomas' Hospital;
- **Character Area 6:** Lambeth Palace;
- **Character Area 7:** Albert Embankment;
- **Character Area 8:** Government Offices;
- **Character Area 9:** Residential development adjacent to Westminster; and
- **Character Area 10:** Smith Square.

6.3 The broad boundaries of the character areas are identified in **Figure 6.1**. The character and appearance of the character areas is discussed below. In some cases, these areas are similar in character to non-adjacent areas, reflecting both the historic development of the area and subsequent redevelopment that has altered original character.

### Character Area 1: Victoria Tower Gardens

6.4 This character area comprises the defined open space of the grade II Registered Victoria Tower Gardens, which form one of a number of important open spaces along the northern bank of the River Thames. It also falls within the Westminster Abbey and Parliament Square CA.

6.5 Victoria Gardens forms a well-contained area – it is separated from surrounding character areas by mature trees and attractive boundary railings. It is more open to views from the Thames and forms an attractive visual element in the setting of a number of character areas on its eastern bank. Public art- in the way of memorials - has an established presence in the area and forms a key component of the local townscape.

6.6 The present arrangement of the gardens results from piecemeal development over a number of phases taking place since 1880.

6.7 Expansions in 1900 and 1910-14 brought the park to its present extent, which is broadly triangular in shape, and includes a large, central lawn, flanked by a dense belt of deciduous trees. The park contains a number of monuments, including Rodin's grade I listed statuary group of the Burghers of Calais, the grade II\* Buxton Memorial, and a grade II statue of Emmeline Pankhurst.

6.8 The open character of the space contrasts with the dense surrounding development, and gives the space the character of an enclave, separated from the surrounding development. The space is heavily influenced by the surrounding environment; principally, the Victoria Tower to the north of the gardens is a defining feature, and the heavy traffic passing along Millbank/ Abingdon Street is a prominent part of the experience. To the east, the river provides wide views across to the opposite bank of the river, as well as north and south.

6.9 Associated viewpoints: 9, 11, 16, 17, 18, 19, 20, 21, 22.

6.10 Townscape value: **High**

### Character Area 2: Westminster World Heritage Site and Parliament Square

6.11 Character area two comprises the core of Westminster, including the Palace of Westminster and Westminster Abbey World Heritage Site. The focal buildings contained therein are The Palace of Westminster, Westminster Abbey, the Church of St Margaret, and the Jewel Tower, all of which are included on the statutory list at grade I, with many others included at grades II\* and II.

6.12 The area falls within the Westminster Abbey and Parliament Square CA and Parliament Square is a Registered Parks and Garden.

6.13 The character area is very busy and attracts significant numbers of tourists throughout the year, along with other heavy road and pedestrian traffic. The roundabout at Parliament Square forms a busy traffic interchange between vehicles traveling along the north bank of the river, crossing Westminster Bridge and traveling north along the A3212. Traffic noise around Parliament Square is very intrusive and Parliament Square is effectively isolated within the area due to traffic.

6.14 A number of strategic and local views are focussed on the Palace of Westminster, and these are included in the Visual Assessment at **Section 9.0**.

6.15 Associated viewpoint: N/A

6.16 Townscape value: **Exceptional**

### Character Area 3a: Millbank

6.17 This character area stretches along the western bank of the River Thames and is delineated by the river to the east, residential development to the west, and the Westminster historic core to the north. The majority of the area falls within the Millbank Conservation Area and the northern part falls within the Smith Square Conservation Area.

6.18 This character area comprises the dense larger scale office development around Millbank and Horseferry Road, the majority of which are occupied by government departments such as MI5, Ofgem and DEFRA. Towards the south of the area, the Millbank Tower (grade II) is a landmark feature which introduces private commercial uses.

6.19 The area is heavily urbanised with built form comprised of office buildings with large footprints, and many of those facing Millbank are faced in Portland Stone. The open aspect to the river means that there is wide intervisibility with the Albert Embankment to the west.

6.20 Millbank forms part of the A3212, a major traffic route along the north bank of the river, which contributes road noise and pollution to the environment. This, coupled with the continuous building line and lack of active frontages, creates a hostile environment for pedestrians. The sporadic tree planting along the bank provides some relief from the urban environment.

6.21 Associated viewpoints: 10, 12

6.22 Townscape value: **Medium**

**Character Area 3b: Victoria Tower Gardens South**

- 6.23 This character area comprises of a small area of open space, located south of Lambeth Bridge and borders with the River Thames. This small pocket park contains an area of green space, with seats overlooking a balustrade to the River Thames.
- 6.24 The area developed as extension of the Victoria Tower Gardens in the 1930s with the rebuilding of the Lambeth Bridge, and the enlargement of the Chelsea embankment.
- 6.25 The adjacent vehicular highways of Millbank to the west and the Millbank roundabout/Lambeth Bridge to the north are a prominent part of the experience to the character area. The open aspect to the river means that there is wide intervisibility with the Albert Embankment to the west, as well as views to the north and south.

6.26 **Associated viewpoint: N/A**

6.27 **Townscape value: Medium**

**Character Area 4: The River Thames**

- 6.28 The River Thames acts as a zone of transition at the interface between the surrounding character areas. It is located within the Westminster Abbey and Parliament Square CA, Smith Square CA, Millbank CA and the Albert Embankment CA.
- 6.29 The river is heavily trafficked with a range of pleasure craft, river buses, and other uses including waste transport and police boats, and the experience of the area predominantly comprises the linear progression north or south, providing a transitory impression of development along the riverbank.
- 6.30 The character area itself provides an open space from which the surrounding townscape can be surveyed; and many of those who travel by boat through the area do so for the views afforded of the surrounding townscape. A number of piers protrude into the riverscape, including the Fire Brigade at the Albert Embankment and the Westminster Embankment.
- 6.31 Associated viewpoints: 1, 8
- 6.32 Townscape value: **High**

**Character Area 5: St Thomas' Hospital**

- 6.33 The St Thomas' Hospital Character Area has its origins in the 19th century, though substantial parts of the complex have been altered and redeveloped. The area is contained by the Thames to the west, Lambeth Palace to the south and Westminster Bridge Road to the north. The riverside walk within Character Area 7 separates the hospital from the river frontage. The character area is located within the Albert Embankment CA.
- 6.34 St Thomas' Hospital complex has a busy, modern atmosphere and is a prominent landmark by virtue of its location on the bank of the Thames opposite the Westminster World Heritage Site. The buildings are best viewed from the Thames, or from the Westminster bank. Building heights range from 4-5 storeys for the 19th century buildings, to 11 storeys in the later 20th century. The area has a self-contained quality, and block structure.
- 6.35 Associated viewpoints: 2, 3, 4, 5, 6
- 6.36 Townscape value: **Medium**

**Character Area 6: Lambeth Palace**

- 6.37 This is a small character area encompassing Lambeth Palace and gardens, St Mary's Church, part of the Archbishop's Park and historic buildings along Lambeth Road. It is one of the most historic areas of the borough, with Lambeth Palace dating from the 13th century.
- 6.38 The character area has well-defined boundaries with Lambeth Road to the south, and Albert Embankment and the Thames to the west. Lambeth Palace has an important historical relationship with the Thames (which used to run along the route of the modern day Lambeth Palace Road), and with the Palace of Westminster on the opposite bank-owing their proximity to their historical significance as the seats of Church and State respectively.
- 6.39 The character area falls within the Lambeth Palace Conservation Area. The buildings are predominantly of a high quality, and most, including Lambeth Palace, are included on the statutory list. The buildings are mainly of 3-4 storeys in height, and of traditional forms and materials.
- 6.40 Lambeth Palace Garden is a grade II Registered Park and Garden, though it is not usually accessible to the public.

- 6.41 The townscape quality is adversely affected by the heavily trafficked Lambeth Road and the roundabout in the neighbouring Albert Embankment Conservation Area, which isolates the Palace from the river.
- 6.42 Views towards the Site are occluded by the boundary wall surrounding Lambeth Palace, which defines the boundary of the character area.
- 6.43 The area is both physically and functionally separated from the Site, and therefore, the Proposed Development does not have the potential to result in a significant effect to the Lambeth Palace character area. Consequently, Character Area 6 is scoped out of further assessment.
- 6.44 Associated viewpoint: N/A
- 6.45 Townscape value: **High**

**Character Area 7: Albert Embankment**

- 6.46 This character area comprises a small part of the Albert Embankment, on the south bank of the river, west of the Site. The character area includes a number of office buildings with large footprints, many of which have been developed in recent years, giving the area a modern character which contrasts with the buildings of Lambeth Palace, in the adjacent area to the north. The majority of the character area falls within the Albert Embankment CA.
- 6.47 The "open" western boundary allows a direct visual connection to be made between the two sides of the River and provides important views to the north towards the Palace of Westminster and west across the River Thames.
- 6.48 The environmental and townscape quality of the character area is lessened by the high traffic levels on the Albert Embankment, a 4-lane thoroughfare, which effectively separates the buildings on the east side of the road from the River and the busy Thameside pedestrian route.
- 6.49 The juncture with Lambeth Bridge introduces heavy traffic into the area, and the A3036 is a major arterial route along the south bank of the river, which introduces traffic noise and pollution into the character area.
- 6.50 Associated viewpoint: 7
- 6.51 Townscape value: **Medium**

**Character Area 8: Government Offices**

- 6.52 This character area comprises the area of large governmental offices arranged around Great Smith Street and Marsham Street. The area has a contained character, set back from the main frontages along the river, and from the Houses of Parliament.
- 6.53 Materially, the area is diverse, but is united through the consistent scale and grain of development, and through the uses, being in the main connected with government. The area is set at the juncture of residential development to the west and south, and the Westminster World Heritage site to the north east.
- 6.54 The Character Area is both physically and functionally separated from the Application Site by Character Area 10, and owing to the interposing development and irregular street arrangement, visibility between Character Area 8 and the Application Site is limited. There is no potential for the Proposed Development to have a significant effect on the character of the area, and thus, Character Area 8 is scoped out of further assessment.
- 6.55 Associated viewpoint: N/A
- 6.56 Townscape value: **Medium**

**Character Area 9: Residential development adjacent to Westminster**

- 6.57 This character area comprises the fine grain residential development at the south and west of the study area, south of Horseferry Road and west of St Anne’s Street. The area includes blocks of flats constructed as part of slum clearance and philanthropic redevelopment in the 19th century, including the large Peabody Estate development around Perkin’s Rents.
- 6.58 The planned development of housing initiatives has, in part, contributed to a regular, legible streetscape along Monck Street and Page Street, which sits alongside retained elements of the medieval street arrangement.
- 6.59 Built form is of varied age, with historic buildings and converted terraces interspersed with modern blocks of flats, some of which accommodate retail or other uses at ground floor.

- 6.60 The area is unified by its residential use, which sets it apart from the surrounding civic and commercial character of development to the north and east.
- 6.61 The Character Area is both physically and functionally separated from the Application Site by Character Areas 8 and 10, and owing to the interposing development and irregular street arrangement, visibility between Character Area 9 and the Application Site is very limited, and change therein would not have an effect on the character of the area. Therefore, the Character Area is scoped out of further assessment.

6.62 Associated viewpoint: N/A

6.63 Townscape value: **High**

**Character Area 10: Smith Square**

- 6.64 This character area is situated west of the Victoria Tower Gardens, separated from the river frontage by Millbank. The character area boundaries are broadly consistent with those of the Smith Square Conservation Area, extending north to Great College Street, west to Tufton Street and south as far as Romney Street.
- 6.65 Smith Square forms the focal point of the character area, with an 18th century street arrangement comprising residential buildings and the St John’s Smith Square Concert Hall to the centre. Tree planting around the church and in the square provides some relief from the urban environment, and frames views towards the former church.
- 6.66 The inward looking nature of the Smith Square CA means that its setting makes a limited contribution to its heritage value and the surrounding urban form means that there is limited intervisibility. There are some views to the north east of the Smith Square CA towards the Houses of Parliament, which make a positive contribution to the setting of the Smith Square CA and this character area.
- 6.67 Along the streets surrounding the square are a number of larger footprint buildings, some of which are in office use. There are no limited views out of the character area owing to the density of surrounding development, and this contributes to a sense of enclosure. The predominant materials in the area are brown brick, and Portland stone, often with an ashlar finish.
- 6.68 Associated viewpoints: 13, 14, 15

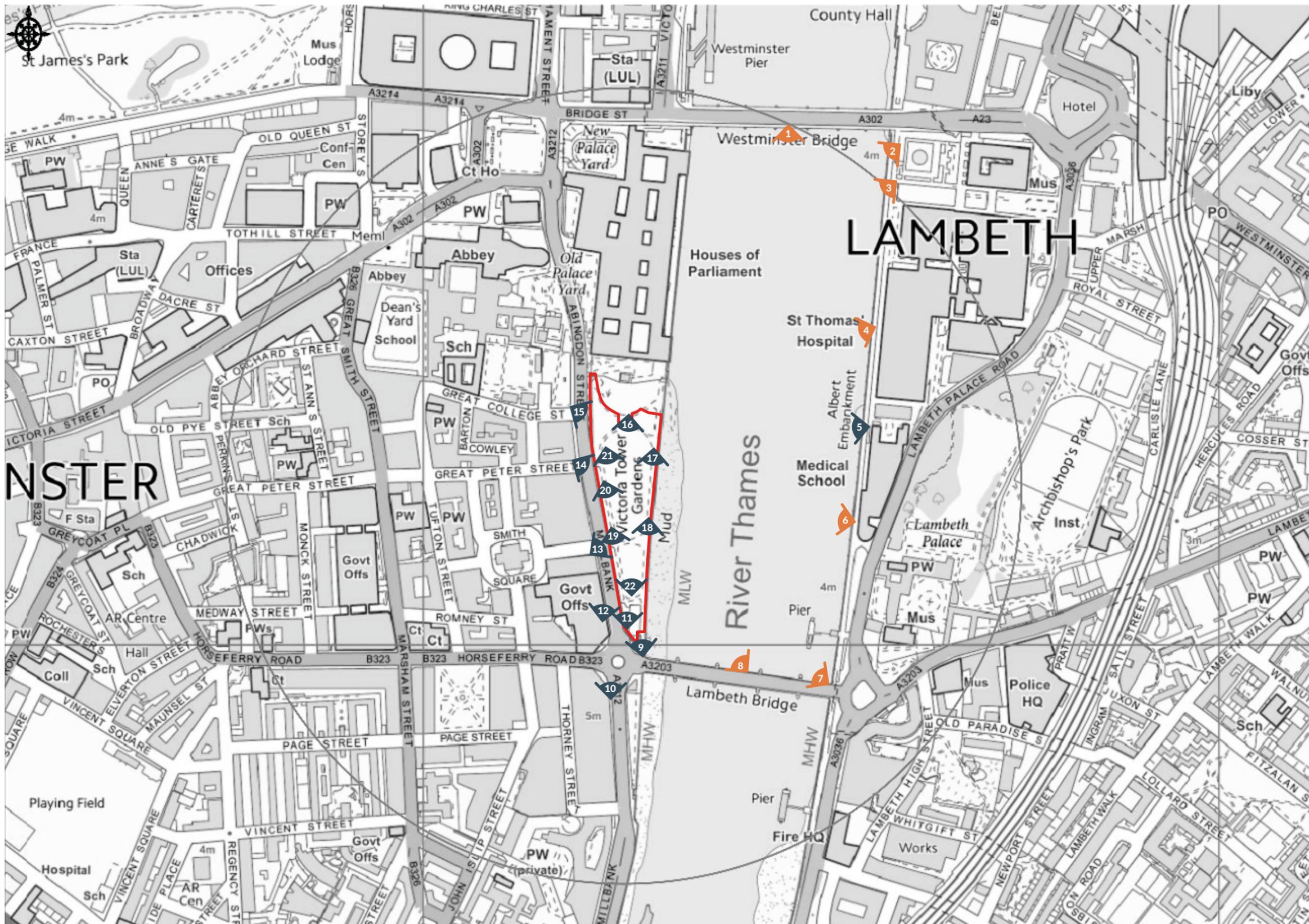
6.69 Townscape value: **Medium**

Name	Map Reference	Townscape Value	Full Assessment
Victoria Tower Gardens	1	High	Yes
Westminster WHS & Parliament Square	2	Exceptional	Yes
Millbank and Victoria Tower Gardens South	3a and 3b	Medium	Yes
The River Thames	4	High	Yes
St Thomas’ Hospital	5	Medium	Yes
Lambeth Palace	6	High	No
Albert Embankment	7	Medium	Yes
Government Offices	8	Medium	No
Residential Development adjacent to Westminster	9	Medium	No
Smith Square	10	Medium	Yes

Table 6.2 Summary of Townscape Baseline

**Visual**

- 6.70 The HTVIA is supported by accurate visual representations (AVRs) of the Proposed Development from 22 viewpoints. The location of the AVRs is provided at **Figure 6.2**. **Table 6.2** 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.
- 6.71 A description of the existing scene for each identified view and the likely visual receptors are provided at **Section 10**. This description is set alongside a corresponding AVR of the Proposed Development and analysis of any significant effect occurring.



**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



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**CHARTERED SURVEYORS**

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**Location:**  
 Holocaust Memorial, Victoria Tower Gardens

**Date:**  
 December 2018

**Scale:**  
 1:5,000 @ A3

Figure 6.3 Viewpoint Location Plan

▲ North

Number	Location	Townscape Character	Heritage Assets	Visual Receptors	AVR Type	Additional Considerations
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)	
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)	
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)	
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)	

Number	Location	Townscape Character	Heritage Assets	Visual Receptors	AVR Type	Additional Considerations
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)	
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)	
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)	
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)	
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)	

Number	Location	Townscape Character	Heritage Assets	Visual Receptors	AVR Type	Additional Considerations
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)	
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)	
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)	
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)	
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)	
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)	
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)	

Number	Location	Townscape Character	Heritage Assets	Visual Receptors	AVR Type	Additional Considerations
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)	
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)	
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)	
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)	
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)	
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)	

Table 6.4 Summary of Visual baseline



// NATIONAL HOLOCAUST MEMORIAL



## Potential Impacts and Mitigation Measures

## 7.0 POTENTIAL IMPACTS AND MITIGATION MEASURES

7.1 This section considers the potential impacts of the Proposed Development both during the construction stage and when the development would be completed. A full description of the Proposed Development is included in the supporting Planning Statement, Design and Access Statement and Section 2 of Volume 2 of the ES.

7.2 The existing Site comprises the publically accessible grounds of the grade II Registered Park and Garden (RPG) Victoria Tower Gardens.

7.3 A description of the proposals (the 'Proposed Development') is provided within the Planning Statement prepared by DP9. The Proposed Development may, however, be summarised as:

*"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."*

7.4 The design of the Proposed Development has evolved over two years, including a two stage international design competition that began on 14 September 2016.

7.5 The Proposed Development has been designed to be an attractive, high quality addition to the collection of memorials located within the Victoria Tower Gardens, the scale and prominence of which has been informed by its subject matter and to respond 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.

### Potential Construction Impacts

7.6 Direct and/or indirect effects to receptors may arise from the Proposed Development during the construction stage of the Proposed Development. Potential effects are likely to relate to construction hoarding, materials and machinery (including cranes) and include potential increases in activity affecting the local road network, and the potential for noise, dust and vibration associated with site preparation works required to facilitate the construction of the new memorial.

7.7 Construction effects are generally treated as less significant in relation to indirect effects to receptors, subject to there being no physical change to built fabric or due to lateral effects of the demolition and construction process, as they are temporary in nature. This approach is consonant with established best practice. Heritage values, being enduring, are accepted as capable of sustaining temporary impositions without any loss of intrinsic value.

7.8 Areas of the construction site and associated infrastructure may be visible from receptors outside of the site boundary for the duration of the construction period, but these would be limited and temporary in nature. In addition, these would generally be seen over distances and a familiar feature of central London, which includes numerous ongoing infrastructure maintenance and construction activities.

7.9 These effects are the necessary first steps to enable the Proposed Development.

### Potential Operational Impacts

7.10 The provision of the new memorial and associated hard and soft landscaping would alter the existing site. The proposals and resulting change in appearance, would permanently alter the existing townscape character and appearance of the existing application Site.

7.11 Views to, from and through the application Site, including the setting of heritage receptors, would potentially be altered as a result of the Proposed Development. Visual receptors, including residents, visitors and workers, would potentially be affected by views to and from the application Site as a result of the Proposed Development.

### Mitigation Measures

#### Embedded Construction Mitigation Measures

7.12 Direct and indirect impacts arising from the construction stage would be controlled through the implementation of a Construction Management Plan (CMP), whose purpose would be to reduce the risk of adverse impact of construction on sensitive environmental resources and to minimise disturbance to local residents and workers throughout the demolition and construction works.

7.13 There is the opportunity to use the construction process and hoardings to provide information to the public by means of, for example changing boards, observation holes in the hoardings and use of any historical information to help tell the 'story' of the Site and its future development.

7.14 A detailed CMP would be prepared once a principal contractor has been appointed. It would include hours of operation and details for the erection of hoardings during the construction stage, which would mitigate visual impact arising from the development. A detailed traffic management plan would also be prepared for the Proposed Development to mitigate potential demolition and construction traffic effects.

7.15 The detailed CMP is anticipated to require contractors to reinstate all working areas both within and outside the application Site and accesses as work proceeds and on completion of the construction works. All plant, materials, vehicles, and temporary hoardings, will be removed.

7.16 Throughout the construction phase safe pedestrian access and routes will be maintained by contractors where possible.

7.17 The implementation of the mitigation measures outlined above would minimise the direct impact of alterations to existing heritage receptors.

- 7.18 The application would be approved on the basis of the submitted plans and relevant submission documents that include details of the proposals (e.g. application drawings). It is anticipated that further details of relevant elements of the proposals would be secured by relevant conditions and/or Section 106 Agreement, as appropriate.
- 7.19 It is anticipated that permission will be conditional on a detailed CMP or similar mitigation measures being prepared and approved by the Council before the construction work begins.
- 7.20 Further details of proposed mitigation of construction impacts are contained within the relevant section of the ES and supporting application documents, including the Construction Management Plan.
- 7.21 Mitigation for archaeology during the construction phase is provided within the relevant section of the ES and supporting application documents, including the Archaeological Desk Based Assessment.
- Embedded Design Mitigation**
- 7.22 As part of the Applicant's commitment to ensure an appropriate design response, the Applicant and its design team have developed a number of measures within the Proposed Development to ensure that the potential for adverse effects are avoided. These are discussed in the following paragraphs.
- 7.23 The positioning, layout and form of the Proposed Development has been informed by pre-application design development and designed to respond to the heritage sensitivities and opportunities of the application Site. Careful regard was also paid to the protection of area of the existing trees. The proposed location and form of the new memorial, including hard and soft landscaping, has been designed to minimise the impact of the Proposed Development on the heritage receptors and to integrate with the townscape context of the Site.
- 7.24 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 Victoria Tower Gardens and the built form in the surrounding environment, and in terms of scale, it sits significantly lower than the surrounding buildings to the north. 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. New views from an elevated area of new landscaping would create a destination from which to appreciate the Houses of Parliament from the south.
- 7.25 The detailed design of the Proposed Development is set out within the Design and Access Statement. The design principles for the Proposed Development have been informed by a detailed assessment of the existing site and a contextual analysis of the surrounding area and seek to both respect and utilise the existing application Site context.
- 7.26 The design of the Proposed Development is of high quality and responds to the sensitivities of relevant heritage receptors and the local context. The high quality design and materials affect the qualitative part of the assessment and are therefore factored into this.
- Embedded Operational Mitigation Measures**
- 7.27 The detailed design of the Proposed Development would be secured by appropriate conditions, where necessary and further detail is required. The development of the detailed design of the proposals would consider how any further mitigation, if necessary, could be incorporated to reduce any potential effects the development may have in heritage, townscape and visual terms.
- 7.28 Victoria Tower Gardens is already frequented by many visitors; the new hard and soft landscaping treatment across the Site will make it more accessible and easier to enjoy. Increased activity arising from a greater number of visitors to the new memorial will be addressed through a Visitor Management Strategy for the facility, submitted as part of this application.
- 7.29 It is anticipated that the long/term maintenance and management of the Application Site, including the associated landscaping, would be secured by appropriate conditions and/or Section 106 Agreement.
- 7.30 The embedded mitigation measures are taken into account in the assessment of residual effects, as appropriate.



// NATIONAL HOLOCAUST MEMORIAL



Assessment: Heritage Receptors

## 8.0 ASSESSMENT: HERITAGE RECEPTORS

- 8.1 This section assesses the effect of the Proposed Development on the built heritage receptors identified in **Table 7.1**.
- 8.2 The Site is located within The Westminster Abbey and Parliament Square Conservation Area and the Victoria Tower Gardens RPG (grade II), which also contains a number of listed structures.
- 8.3 A qualitative assessment of the potential effect of the Proposed Development on each receptor is provided below.
- 8.4 In reading this section, reference should be made to the submitted drawings and Design and Access Statement prepared by Adjaye Associates, including the design rationale and architectural approach that has governed the proposals.
- Site Preparation and Construction Phase**
- 8.5 In this assessment, construction effects, being temporary, are generally treated as less significant. This approach is consonant with established best practice. Heritage values, being enduring, are accepted to be capable of sustaining temporary intrusions without loss of intrinsic value. Conditions on any consent would of course be applied to minimise any disruption to amenity, including visual amenity, more generally.
- 8.6 Appendix C of the ES describes the anticipated programme of works and the key activities which would be undertaken on the Site during the Site preparation and construction work necessary to erect the Memorial and Learning Centre. The construction phase is anticipated to last approximately 31 months.
- 8.7 The demolition and construction period is short to medium-term, defined within the context of the ES. The proposed development incorporates construction and management mitigation measures for avoiding and reducing environmental effects during this phase.
- 8.8 The construction phase would result in increased noise, vibration, dust and traffic in the immediate surrounding area. The construction phase seeks to ensure that the maximal area of Victoria Tower Gardens remains open to the public during the construction phase. During Phase 1, parts of the park will be enclosed within hoardings, including the Horseferry Playground. During phase 2, two pedestrian access points along Millbank will be repurposed as vehicular access points. This is likely to result in additional noise and areas of the site being enclosed with hoardings within the area of the Victoria Tower Gardens. We therefore judge that the construction phase would have a **temporary Minor Adverse** effect on the Victoria Tower Gardens Registered Park.
- 8.9 This effect would be direct, local and temporary.  
*The Buxton Memorial would be retained in situ during the construction phase, and protected by site hoardings. The approach to its conservation is outlined in the Construction Management Plan at Appendix C, which states:*
- 8.10 *“The Buxton Memorial is located adjacent to the proposed Memorial structure and will therefore require special attention to preserve its appearance and structural integrity. The responsibility for this will form a condition of contract with the appointed contractor, ensuring full responsibility for the Buxton Memorial is accounted for. It is expected that the Contractor will be required to carry out a condition survey, documentation, protection and regular monitoring throughout the construction process, in accordance with all planning permission requirements.”*
- 8.11 The effect on the Buxton Memorial would be **temporary Minor Adverse** for the period of construction. However, being temporary in nature, and necessary to facilitate the creation of the Proposed Development.
- 8.12 The construction period is local to the Site, and will be temporary in duration. We therefore judge that the construction phase will have a **temporary Minor Adverse** effect on the heritage value of the following receptors:
- Statuary Group of the Burghers of Calais (grade I);
  - Statue of Mrs. Emmeline Pankhurst (grade II);
  - River Embankment from the Houses of Parliament to Lambeth Bridge (grade II); and
  - Westminster Abbey and Parliament Square Conservation Area.
- 8.13 This effect would be direct, local and temporary.
- We anticipate that the Construction phase of works will result in a Negligible effect on the following heritage receptors:
  - Palace of Westminster, Westminster Abbey and St Margaret’s Church World Heritage Site;
  - Victoria Tower Lodge and gates to Black Rod Garden (grade I);
  - Houses of Parliament and the Palace of Westminster (grade I);
  - Westminster Abbey (the Collegiate Church of St Peter);
  - St John Smith Square Concert Hall (grade I);
  - 6-9 Smith Square, SW1 (grade II\*);
  - The Church Commissioners (grade II\*);
  - 9 Little College Street, SW1 (grade II\*);
  - Knife Edge Two Piece Sculpture (grade II\*);
  - South Wing at St Thomas’ Hospital excluding post-1926 Courtyard Infill Buildings (grade II);
  - Block 9 of St Thomas’ Hospital Medical School (grade II);
  - Wall along Western Boundary of St Thomas’ Hospital (grade II);
  - Fifteen Public Benches on Embankment Footpath between Lambeth Bridge and Westminster Bridge (grade II);
  - Norwest House (grade II);
  - Millbank Tower (grade II);
  - Thames House (North and South Blocks with Bridge Link) (grade II);
  - Smith Square Conservation Area; and
- Albert Embankment Conservation Area.**
- There will be Nil effect on the following receptors:
  - Bronze statue of Edward VI at north entrance to ward block of North Wing at St Thomas’ Hospital (grade II\*);
  - Statue of Robert Clayton at north entrance to ward block of north wing of St Thomas’ Hospital (grade I);
  - K6 Telephone Kiosk, Lambeth Palace Road/ Albert Embankment (grade II);
  - 7 lamp standards numbered G4, 5 and 6 and G9, 10, 11 and 12 (grade II);
  - Lamp standard numbered G1 on corner of Smith Square (grade II);

- 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 (grade II).
- 8.14 This is due to the localised nature of the works, their limited duration, and the continued ability to appreciate their heritage value during the construction phase.
- Operational Phase**
- World Heritage Sites**
- Palace of Westminster, Westminster Abbey and St Margaret's Church World Heritage Site*
- 8.15 As discussed at baseline stage, the considerable heritage value of the Westminster World Heritage Site is derived from its function as the seat of government and focus of religion for over 900 years. The Application Site is situated outside the WHS boundary, within the Victoria Tower Gardens to the south, which are noted in the WHS Management Plan (2007) as an important aspect of its setting which provides relief from the heavily urbanised environment on the north bank of the river.
- 8.16 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.
- Form and Function of the Proposed Development**
- 8.17 The OUV of the WHS is derived in part from its long history as one of the world's oldest parliamentary democracies, supported by an unparalleled collection of built form which illustrates the development of the nation over more than a thousand years.
- 8.18 It is established that a memorial is an entirely appropriate form of development in the setting of the Westminster World Heritage Site.
- 8.19 In terms of its form, the series of bronze fins respond to the materiality and perpendicular character of the Palace of Westminster, whilst introducing a high quality, sculptural form to the setting.
- 8.20 The gentle undulation of the land within the Proposed Development, culminating in the area of raised ground above the fins, will contribute to an attractive, well-planned setting, which will be maintained through a management scheme. The new viewpoint introduced at the top of this mound will create a new perspective from which the form and OUV of the WHS can be appreciated by visitors to the park.
- 8.21 The proposed entrance pavilion and courtyard have been designed to remain subservient to the fins of the monument, and to form attractive additions to the park space.
- 8.22 The play area at the southern extent of the park is to be re-landscaped and enhanced with new play equipment, and the new café kiosk is situated close to the south of the park, and these elements will not affect the OUV of the WHS, or change the visitor's ability to appreciate its international importance.
- 8.23 The high quality of the design of the memorial, the national resonance of its function, and its relationship with the buildings of the WHS would make a positive contribution to the Outstanding Universal Value of the World Heritage Site, as an important, and entirely appropriate, development in its setting.
- Character of the Victoria Tower Gardens**
- 8.24 The Victoria Tower Gardens forms an area of open space in the environs of the WHS, separate from the busy, heavily trafficked environment beyond.
- 8.25 This contrast between the heavily urbanised environment within the WHS at Parliament Square, and the parkland character of the space within the Victoria Tower Gardens, makes an important contribution to the setting, and thus OUV of the World Heritage Site.
- 8.26 The northern portion of the park, closer to the WHS, will retain its open character through the Proposed Development. The landscaping scheme will retain the wide expanse of lawn and linear pedestrian routes, and introduce new, curved footpaths towards the memorial.
- 8.27 The Operational Parameters Assessment submitted with this Application identifies the northernmost gate in the park, at Black Rod's Garden, as visitors' principal access route into the park, from which point they will travel south along the footpaths towards the memorial.
- 8.28 The Proposed Development would necessarily increase the number of visitors to the park, and reinforce the memorial function of the space through the creation of a distinctive, high quality memorial and learning centre. It is possible that visitors to the learning centre would spend time in the park space as part of their visit, and the Visitor Management Strategy demonstrates that these could be accommodated comfortably within the space.
- 8.29 Therefore, whilst more visitors would visit the park space, this would not change the contribution made by the space to the setting of the WHS, and by extension, its OUV.
- Impact on setting through views**
- 8.30 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.
- 8.31 The effect on setting in views of the WHS overlaps to a degree with the Visual Impact Assessment at **Section 10.0**, though the assessment of the effect on the setting is distinct from that of the effect on visual amenity. Therefore, where applicable, we have cross-referred to relevant viewpoints included in the visual assessment.
- 8.32 The scale of the Proposed Development is below that of the surrounding trees, and responds to the height of the Buxton Memorial within the park, and the setting of the WHS. This means that awareness of the Proposed Development from outside the Victoria Tower Gardens is limited, and the ability of the viewer to appreciate the OUV of the WHS from areas outside the park, including the protected silhouette of the buildings against the skyline, whilst traveling along the opposite bank of the river, will not change.

- 8.33 The Victoria Tower and southern elevation of the Palace of Westminster are the dominant features in views north from within the space of Victoria Tower Gardens, and these views contribute to the appreciation the OUV of the World Heritage Site. From the northern portion of the park, views towards the WHS would be preserved.
- 8.34 Some views towards the Victoria Tower from further south in the park would be curtailed by the Proposed Development, which would appear in the foreground. The loss of these views is, however, mitigated through the creation of a new, designed view, from a raised area of landscaping above the monument (**Figure 8.1**).
- 8.35 This would allow the appreciation of the receptor from a new perspective, and create a space from which the visitor's attention would be deliberately focussed on the view towards the WHS.
- 8.36 The new viewing area would therefore be beneficial to the appreciation of the receptor's OUV.
- 8.37 Considering these effects collectively, we conclude that the overall effect on the World Heritage Site would be Moderate Beneficial.

#### Registered Parks and Gardens

##### *Victoria Tower Gardens (grade II)*

- 8.38 The Victoria Tower Gardens forms an area of open space in the environs of the WHS, which possesses historic interest for its piecemeal development, described in detail at **Section 4.0**, and as an important area of partially reclaimed land adjacent to the Westminster World Heritage Site.
- 8.39 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. The park contains a number of memorials, and the interrelationship between the public works within the park and the WHS in its immediate setting is an important part of the park's heritage value.
- 8.40 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.



**Figure 8.1** New designed viewpoint from the top of the memorial

- 8.41 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. This will include provision for the maintenance of the memorial and the green character of the park as a whole.
- 8.42 The landscape is already frequented by many visitors, including office workers, local residents and others moving through the area.
- 8.43 The Operational Parameters Assessment submitted with this Application identifies the northernmost gate in the park, at Black Rod's Garden, as visitors' principal access route into the park, from which point they will travel south along the footpaths towards the memorial.
- 8.44 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. It is possible that visitors to the learning centre would spend time in the park space as part of their visit, and the Operational Parameters Assessment demonstrates that these could be accommodated comfortably within the space.
- 8.45 Therefore, more visitors will not materially erode the heritage value of the park.
- 8.46 The basement element of the learning centre will not form part of the experience of the park for casual visitors to the space, and will have no effect upon its heritage value as an urban park within a city centre.
- 8.47 The gentle slope of the landscape to the north rising to the curved plane above the fins will be an attractive feature within the park, which will enhance the opportunity for visitors to appreciate its unique setting adjacent to the WHS.
- 8.48 The proposed entrance pavilion and courtyard have been designed to remain subservient to the fins of the monument, and to form attractive additions to the park space.
- 8.49 The play area at the southern extent of the park is to be re-landscaped and enhanced with new play equipment, which continues the existing use and character of the RPG.
- 8.50 The narrowing space at the southern extent of the park, and the café kiosk, creates some congestion at this furthest part of the RPG, however, these are necessary features which will not affect the visitor's overall ability to appreciate the heritage value of the park as an open space adjacent to the WHS.
- 8.51 The high quality of the design of the memorial and the national resonance of its function are in keeping with the existing use of the park, which houses a number of memorials.
- 8.52 The competition-winning design of the Proposed Development, and symbolic purpose of the memorial will make a positive contribution to the historic and design interest of the park.
- Therefore, considering these effects collectively, we find that the overall effect on the Victoria Tower Gardens would be Moderate Beneficial.**
- Listed Buildings**
- Victoria Tower Lodge and gates to Black Rod Garden (grade I)**
- 8.53 The Victoria Tower Lodge and gates to Black Rod Garden are situated at the north of the Victoria Tower Gardens, and the busy interchange near Parliament Square forms a prominent aspect of their setting. The gates and lodge are primarily associated with the Victoria Tower and Palace of Westminster.
- 8.54 The Proposed Development would be a change to the wider setting of the receptor, within the open space of the park. The separating distance would retain a sense of distinction between the receptor and the Proposed Development, and the immediate setting of the receptor would not change.
- 8.55 The heritage value of the receptor, and the ability to appreciate it, would not change.
- 8.56 Therefore, the magnitude of impact would be Negligible. The likely significant effect would be **Negligible**.
- 8.57 This effect would be direct, permanent, and local.
- Statuary Group of the Burghers of Calais (grade I)**
- 8.58 The statuary group of the Burghers of Calais is situated at the northern extent of the park, close to Black Rod Garden and the Victoria Tower. Its setting comprises the immediate area of hardstanding surrounding the plinth, and the wider open space within the park, which allows for its appreciation.
- 8.59 The open character of the land at the north of the park would be preserved.
- 8.60 The new landscaping scheme would create a gentle, curved slope in the setting of the receptor to the south, above which the sculptural bronze fins of the Proposed Development would be an attractive, sculptural addition which would be an appropriate addition to the setting of the receptor.
- 8.61 The new view created from the top of the curved mound would create a new perspective from which to appreciate distant views towards the receptor, seen in the context of the Victoria Tower.
- 8.62 Therefore, the magnitude of impact would be Medium. The likely significant effect would be **Moderate Beneficial**.
- 8.63 This effect would be direct, local and permanent.
- Houses of Parliament and the Palace of Westminster (grade I)**
- 8.64 The buildings of the Houses of Parliament, in particular, have an immediately recognisable form and silhouette which is recreated in countless depictions, from paintings by Turner to souvenir photographs by visitors. The appreciation of this silhouette in views from the river would not change, as demonstrated in the visual assessment at **Section 10.0**.
- 8.65 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.
- 8.66 The setting of the receptor to the north, and within Parliament Square would not change.
- 8.67 The Proposed Development would change the appreciation of the Victoria Tower in some views from the south, to include the form of the Proposed Development.

- 8.68 The new area of landscaping would create a destination from which to appreciate the buildings from the south, which would facilitate the appreciation of the receptor from a new perspective, better revealing its significance.
- 8.69 The high quality of the design responds to its context, and its form and materials provide a symbolic, sculptural feature which is an entirely appropriate form of development in the receptor's setting.
- 8.70 Therefore, we judge that the Proposed Development would preserve the heritage value of 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 the listed building from this part of its setting.
- 8.71 Therefore, considering these effects collectively, we find that the overall effect would be **Moderate Beneficial**.
- 8.72 This effect would be direct, local and permanent.
- Westminster Abbey (the Collegiate Church of St Peter)*
- 8.73 Westminster Abbey derives its heritage value from its longstanding function as the embodiment of the interplay between the church and state in Britain, spanning almost 1000 years.
- 8.74 The Abbey is experienced primarily from Parliament Square to the north, and the enclosed, semi-private space of the cloisters to the south, and the relationship with the adjacent Houses of Parliament is of particular importance, recognised in their collective designation as a WHS.
- 8.75 The Victoria Tower Gardens makes a limited contribution to the wider setting of the receptor as an area of park space.
- 8.76 The Abbey is also appreciated in some views as part of the protected silhouette of the World Heritage Site. This is considered in more detail at **Section 10.0**.
- 8.77 The Proposed Development would not change the ability to appreciate the heritage value of the receptor. The immediate setting within the heart of Westminster, and the legibility of the relationship with the Houses of Parliament and adjacent World Heritage Site buildings, would not change.
- 8.78 The Proposed Development would be partially visible in some views towards the receptor as part of the WHS silhouette, but where this is the case, it would not be a prominent feature, and would have no effect on the appreciation of views towards the receptor from this perspective.
- 8.79 Therefore, the magnitude of impact would be Negligible. The likely significant effect would be **Negligible**.
- 8.80 This effect would be direct, local and permanent.
- Buxton Memorial Fountain, Victoria Tower Gardens (grade II\*)*
- 8.81 The Buxton Memorial Fountain is an attractive, octagonal structure by SS Teulon which commemorates the emancipation of slaves in Britain in 1834. As discussed at **Section 5.0**, the fountain was relocated to its present position in the 1950s, having been removed from its original position in Parliament Square in 1949.
- 8.82 The memorial is currently situated at the conjunction of pedestrian paths, and is a prominent feature visible from across the park.
- 8.83 Closer in, however, the open space and pathways are not conducive to meaningful contemplation of the monument; there is no clear space for the visitor to pause and reflect.
- 8.84 For these reasons, our baseline analysis concluded that the present setting of the receptor makes a mixed contribution to its appreciation. Therefore, there is scope to enhance the contribution made by elements of its setting to the appreciation of its heritage value.
- 8.85 The Proposed Development will change the character of the receptor's setting from one of open parkland to a new, designed landscape, and introduce a large structure in close proximity. Therefore, special consideration has been given through the design development process to the preservation and enhancement of the Buxton Memorial's setting.
- 8.86 Consequently, the height of the Proposed Development will not exceed that of the receptor, which will therefore remain as a prominent feature within the park. In views from the river side, the partial views of the Buxton Memorial, filtered through the tree line, will remain, as will the view towards the monument from the west, along Dean Stanley Street.
- 8.87 The ability to appreciate the memorial's proximity to Parliament, and the importance of the relationship between the two, would be preserved.
- 8.88 Some views towards the receptor will be screened by the Proposed Development, such as those from the western side of the park, and from parts of its northern extent. Whilst these views do allow for some appreciation of the monument, they are incidental, and are not the position from which the heritage value of the receptor can be best appreciated.
- 8.89 Historic England's guidance, *Setting of Heritage Assets* (GPA3, December 2017), states that proposals should explore ways to maximise enhancement and avoid or minimise harm to the setting of heritage assets. In accordance with paragraph 38 of GPA3 the proposals would introduce a wholly new complimentary feature that attracts visitors to this part of the Victoria Tower Gardens. The proposals would encourage greater public appreciation of the asset and would introduce new views and opportunities to appreciate the asset that add to the public experience of the listed statue.
- 8.90 In accordance with paragraph 200 of the NPPF and Policy S25 of the Westminster City Plan the proposals would enhance aspects of the immediate setting of the Buxton Memorial and better reveal the significance of the listed statue by creating new views and an enhanced visitor experience, with a new seating area and opportunity for improved interpretation.
- 8.91 The immediate setting of the memorial will be defined by a low seating wall, which will provide a space for visitors to pause, appreciate the memorial's physical form, and also its purpose. This will facilitate the visitor's better understanding of the purpose of the memorial, as well as an appreciation of its aesthetic quality.
- 8.92 Whilst the loss of some longer views would constrain the space from which the visitor is able to appreciate the receptor's heritage value, this appreciation would, in fact, be enhanced through the provision of new interpretation, and a designed setting which responds to the memorial and creates a space from which to regard its historic and architectural interest.
- 8.93 The change to the setting would not, therefore, be harmful, and the ability of the visitor appreciate the monument's heritage value will be enhanced through the new landscaping and interpretation.
- 8.94 Therefore, the magnitude of impact would be Medium. The likely significant effect would be **Moderate Beneficial**.
- 8.95 This effect would be direct, local and permanent.

<p><i>St John Smith Square Concert Hall (grade I)</i></p> <p>8.96 The St John Smith Square Concert Hall is of interest as the centrepiece of the 18th century arrangement focussed on Smith Square.</p> <p>8.97 Its setting consists primarily of the formal layout of 18th century townhouses around Smith Square, within which it forms the focal point.</p> <p>8.98 The receptor will be partially visible in views east along Dean Stanley Street over a distance of approximately 110m, however, the setting of the receptor is focussed on the space of the square, and it would not appear concurrently in views with the Proposed Development.</p> <p>8.99 Therefore, the magnitude of impact would be Negligible. The likely significant effect would be <b>Negligible</b>.</p> <p>8.100 This effect would be direct, permanent, and local.</p>	<p><i>6-9 Smith Square, SW1 (grade II*)</i></p> <p>8.109 This receptor is situated on the west side of Smith Square, and forms part of the planned layout of 18th century houses therein, which are its primary setting.</p> <p>8.110 There is the potential for some, partial views towards the Proposed Development along Dean Stanley Street taking in the receptor, however, these would be partial, incidental, and would not affect the legibility of the 18th century Smith Square development. The heritage value of the receptor, and appreciation thereof, would not change as a result of the Proposed Development.</p> <p>8.111 Therefore, the magnitude of impact would be Negligible. The likely significant effect would be <b>Negligible</b>.</p> <p>8.112 This effect would be direct, permanent, and local.</p>	<p>8.120 This effect would be direct, permanent, and local.</p> <p><i>Knife Edge Two Piece Sculpture (grade II*)</i></p> <p>8.121 The Knife Edge Two Piece Sculpture is set within its own defined open space, which is separated from the Application Site by the busy Abingdon Street approach to Parliament Square.</p> <p>8.122 The Proposed Development would not materially affect the experience or heritage value of the receptor, and the ability to appreciate its special interest would be preserved.</p> <p>8.123 Therefore, the magnitude of impact would be Negligible. The likely significant effect would be <b>Negligible</b>.</p> <p>8.124 This effect would be direct, permanent, and local.</p>
<p><i>Statue of Robert Clayton at north entrance to ward block of north wing of St Thomas' Hospital (grade I)</i></p> <p>8.101 The receptor is primarily experienced within a contained setting within the campus of St Thomas' Hospital. Whilst there are some views towards the river, the opposing bank and, by extension, the Application Site, do not meaningfully contribute to the setting of the receptor.</p> <p>8.102 If the Proposed Development is distantly perceptible in the wider setting of the receptor, the change would not affect its heritage value, or the appreciation thereof.</p> <p>8.103 Therefore, the magnitude of impact would be Neutral. The likely significant effect would be <b>Nil</b>.</p> <p>8.104 This effect would be direct, permanent, and local.</p>	<p><i>The Church Commissioners (grade II*)</i></p> <p>8.113 The Application Site is separated from the receptor by the dense tree boundary at the edge of the park, and the busy traffic thoroughfare along Abingdon Street.</p> <p>8.114 The open character of Black Rod's Garden and the northernmost part of the park closest to the receptor would be preserved.</p> <p>8.115 The Proposed Development would introduce a new element in the wider setting of the receptor to the south east, which would be a perceptible change, however it would have no effect on the heritage value of the receptor, or its appreciation.</p> <p>8.116 Therefore, the magnitude of impact would be Negligible. The likely significant effect would be <b>Negligible</b>.</p> <p>8.117 This effect would be direct, permanent, and local.</p>	<p><i>Block 9 of St Thomas' Hospital Medical School (grade II), South Wing at St Thomas' Hospital excluding post-1926 Courtyard Infill Buildings (grade II)</i></p> <p>8.125 These receptors are situated on the opposite bank of the river to the east of the Application Site.</p> <p>8.126 The receptors' relationship with the open space of the river makes an important contribution to their setting, and due to their proximity, the Victoria Tower Gardens contribute to the appearance of the opposite bank.</p> <p>8.127 The Proposed Development would be a perceptible change in the wider setting of the receptor to the west. The degree of intervisibility between the two would be subject to seasonal variation, and the existing tree line in the Victoria Tower Gardens would filter views towards the memorial. It would not change the overall character of the receptor's setting, or the contribution made to that setting by the Victoria Tower Gardens.</p>
<p><i>Bronze Statue of Edward VI at north entrance to Ward Block of North Wing at St Thomas' Hospital (grade II*)</i></p> <p>8.105 The receptor is situated within the campus of St Thomas' Hospital, and has a contained setting.</p> <p>8.106 The Proposed Development would have no effect on the setting or appreciation of the receptor.</p> <p>8.107 Therefore, the magnitude of impact would be Nil. The likely significant effect would be <b>Nil</b>.</p> <p>8.108 This effect would be direct, permanent, and local.</p>	<p><i>9 Little College Street, SW1 (grade II*)</i></p> <p>8.118 9 Little College Street is situated to the west of the receptor, set behind the primary frontages to Millbank. The Application Site does not meaningfully contribute to its setting or heritage value, and whilst there is the potential for some intervisibility with the Proposed Development along Great Peter Street, this would not change the heritage value of the receptor, or the ability to appreciate its special interest.</p> <p>8.119 Therefore, the magnitude of impact would be Negligible. The likely significant effect would be <b>Negligible</b>.</p>	<p>8.128 Therefore, whilst the observer might be aware of the change from the east side of the receptor, it would not have an effect on its heritage value or appreciation thereof.</p> <p>8.129 Therefore, the magnitude of impact would be Negligible. The likely significant effect would be <b>Negligible</b>.</p> <p>8.130 This effect would be direct, permanent, and local.</p>

*Fifteen Public Benches on Embankment Footpath between Lambeth Bridge and Westminster Bridge (grade II)*

- 8.131 These receptors are situated on the east side of the Thames, in the environs of St Thomas' Hospital. They are experienced in the context of the open space of the river to the west. The dense tree boundary of the Victoria Tower Gardens to the south west forms part of the wider setting, against which the Houses of Parliament are seen.
- 8.132 The Proposed Development would not change the overall character of the receptors' setting, or the contribution made to that setting by the Victoria Tower Gardens. Whilst there may be some partial, filtered views of the Proposed Development through the tree line within the park, these would not change the heritage value of the receptors, or their appreciation.
- 8.133 Therefore, the magnitude of impact would be Negligible. The likely significant effect would be **Negligible**.
- 8.134 This effect would be direct, permanent, and local.

*Wall along Western Boundary of St Thomas' Hospital (grade II)*

- 8.135 This receptor defines the extent of the St Thomas' Hospital Campus, and therefore has a setting comprised of two key parts; the space within the campus, and the riverside walk and Thames adjacent.
- 8.136 Whilst there is the potential for some views of the Proposed Development, these would be screened, seasonally, by the dense tree cover within the Victoria Tower Gardens, and would be a small, incidental element within the wide expanse of the receptor's riverside setting. The Proposed Development would have no effect on the heritage value or appreciation of the receptor.
- 8.137 Therefore, the magnitude of impact would be Negligible. The likely significant effect would be **Negligible**.
- 8.138 This effect would be direct, permanent, and local.

*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 (grade II)*

- 8.139 The setting of these receptors is primarily contained within the 18th century planned development focussed on Smith Square. Any intervisibility with the Proposed Development would be incidental, and not affect the heritage value or appreciation of the receptor.
- 8.140 Therefore, the magnitude of impact would be Neutral. The likely significant effect would be **Nil**.
- 8.141 This effect would be direct, permanent, and local.
- Norwest House (grade II)*
- 8.142 Norwest House is an office block designed as part of a uniform composition with Thames House. Horseferry Road and Lambeth Bridge are important elements in its setting, as is the dense, urban environment along Millbank and Horseferry Road, and the leafy park space within Victoria Tower Gardens.
- 8.143 The Proposed Development would introduce a new element within the park space in the setting of the receptor. The sculptural form of the monument would be an attractive addition to the space, and would be understood as part of a wider context of memorials within the park space.
- 8.144 The fundamental character of the receptor's setting would not change. Its intrinsic heritage value, and the appreciation thereof, would be preserved.
- 8.145 Therefore, the magnitude of impact would be Negligible. The likely significant effect would be **Negligible**.
- 8.146 This effect would be direct, local and permanent.
- Millbank Tower (grade II)*
- 8.147 The Millbank Tower derives its heritage value from its status as one of the earliest tall buildings in London.
- 8.148 Due to the scale of the tower, and that of surrounding development, it has a wide setting, comprised of the urban space on the north bank of the river, the open space of the Thames, and wide ranging views across London. It is experienced primarily from Millbank, and in views taking in the riverscape and north bank.

- 8.149 Victoria Tower Gardens forms an element within this wider setting, though the curved embankment limits intervisibility between the two. There is the potential for some views of the Proposed Development in conjunction with the receptor, but these would be understood within the context of the mixed development in this part of Westminster, and would not meaningfully change its setting.
- 8.150 The Proposed Development may be a perceptible change in the wider setting of the receptor, though this would not change the heritage value of the Millbank Tower, or the appreciation of its heritage value.
- 8.151 Therefore, the magnitude of impact would be Negligible. The likely significant effect would be **Negligible**.
- 8.152 This effect would be direct, permanent, and local.
- K6 Telephone Kiosk, Lambeth Palace Road/ Albert Embankment (grade II)*
- 8.153 This receptor is situated to the east of the Application Site, on the opposite bank of the Thames. Its setting comprises the open space of the Riverside Walk, and Lambeth Palace Road to the east, and Lambeth Pier to its immediate west, which partially screens views across the river towards the Site. The Site does not meaningfully contribute to the setting or appreciation of the receptor.
- 8.154 The Application Site is screened from view by the existing dense tree line in Victoria Tower Gardens, and any views towards the Proposed Development would be partial, seasonal, and seen in this context.
- 8.155 Whilst the Proposed Development may be a perceptible change within the setting of the receptor, it would not affect the intrinsic heritage value of the receptor, or the appreciation thereof.
- 8.156 Therefore, the magnitude of impact would be Neutral. The likely significant effect would be **Nil**.
- 8.157 This effect would be direct, permanent, and local.

<p><i>7 lamp standards numbered G4, 5 and 6 and G9, 10, 11 and 12 (grade II), Lamp standard numbered G1 on corner of Smith Square (grade II)</i></p> <p>8.158 These 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 focussed on their immediate context within the Smith Square development. The space outside of the planned arrangement makes a very limited contribution to their setting.</p> <p>8.159 The Proposed Development may be visible in some views along Dean Stanley Street, but this would be understood separately from the historic arrangement at Smith Square.</p> <p>8.160 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.</p> <p>8.161 Therefore, the magnitude of impact would be Neutral. The likely significant effect would be <b>Nil</b>.</p> <p>8.162 This effect would be direct, permanent, and local.</p>	<p><i>River Embankment from the Houses of Parliament to Lambeth Bridge (grade II)</i></p> <p>8.168 The river embankment derives its heritage value from its development as part of the Victorian alterations to this part of the river bank. The setting of the receptor comprises two main elements; the open space of the Thames to the east, and the Victoria Tower Gardens to the west, which are defined by the dense tree line in views toward the receptor.</p> <p>8.169 The Proposed Development would be partially visible in the background of some views towards the receptor from the Albert Embankment, on the south side of the river, and would introduce a new, high quality structure in the setting of the receptor, which would be in keeping with the existing character of views from this perspective (see viewpoint 5 at <b>Section 10.0</b>).</p> <p>8.170 The open character of the land at the north of the park would be preserved, and the new landscaping scheme would create a gentle, curved slope, which would contribute to the setting of the receptor.</p> <p>8.171 To the north of the park, the sculptural quality of the Proposed Development would be an attractive, appropriate feature, and the enhanced landscaping along the east side of the park would form an attractive environment in the receptor's setting.</p> <p>8.172 The contribution made by the trees within the park would be preserved, and the fundamental components of the embankment's setting- the river, and the gardens, would remain distinct and legible.</p> <p>8.173 The change in the character of the land within the park would not affect the visitor's ability to appreciate the heritage value of the embankment, or its development. Indeed, the increased footfall of visitors to the Victoria Tower Gardens as a result of the Proposed Development may enable the heritage value of the receptor to be experienced by a greater number of people</p> <p>8.174 Overall it is considered that the Proposed Development would have a <b>Minor Beneficial</b> effect on the heritage receptor.</p> <p>8.175 This effect would be direct, permanent, and local.</p>	<p>the entrance from Abingdon Street, close to Black Rod Gardens. The Memorial is oriented west.</p> <p>8.177 The Proposed Development would introduce a new memorial in the wider setting of the receptor to the south. This would form part of the existing portfolio of monuments located within the gardens, which already form part of the wider setting of the receptor.</p> <p>8.178 The increased footfall of visitors to the Victoria Tower Gardens as a result of the Proposed Development may enable the heritage value of the receptor to be experienced by a greater number of people, particularly owing to its position close to an entrance to the gardens.</p> <p>8.179 The immediate setting of the receptor, comprised of an area of hard standing and framed by dense vegetation, would not change. The relationship with the adjacent Houses of Parliament, an important part of the receptor's setting, would be preserved.</p> <p>8.180 Whilst the Proposed Development would result in a change to the character of the receptor's setting to the south, those elements which contribute to its heritage value, and the appreciation thereof, would not change.</p> <p>8.181 Therefore, the magnitude of impact would be Negligible. The likely significant effect would be <b>Negligible</b>.</p> <p>8.182 This effect would be direct, permanent, and local.</p>
<p><i>Thames House (North and South Blocks with Bridge Link) (grade II)</i></p> <p>8.163 Thames House is situated to the south west of the Application Site, from which it is separated by Millbank and the Lambeth Bridge/ Horseferry Road junction. Its primary setting comprises the area to the south of Lambeth Bridge, including views across the river, and the southern portion of the Victoria Tower Gardens.</p> <p>8.164 The Proposed Development would be visible in the setting of the receptor, but would not feature in any significant views towards the building, or its front elevation.</p> <p>8.165 Therefore, whilst it would change an element of its wider setting, this change would not affect the heritage value of the receptor, or the appreciation thereof.</p> <p>8.166 Therefore, the magnitude of impact would be Negligible. The likely significant effect would be <b>Negligible</b>.</p> <p>8.167 This effect would be direct, permanent, and local.</p>	<p><i>Statue of Mrs Emmeline Pankhurst (grade II)</i></p> <p>8.176 The Statue of Mrs Emmeline Pankhurst is situated at the northern extent of the Victoria Tower Gardens, and is best experienced close to</p>	<p><b>Conservation Areas</b></p> <p><i>Westminster Abbey and Parliament Square Conservation Area</i></p> <p>8.183 The Westminster Abbey and Parliament Square Conservation Area derives its special character from its long history and piecemeal development, reflected in its historic street layout and range of built form, as well as its long standing use as the seat of government.</p> <p>8.184 The experience of the memorial is primarily contained within the southern part of the Conservation Area, by virtue of its scale, which remains subservient to the branch line of the surrounding trees, and is lower than the adjacent Buxton Memorial. The historic, civic character of the Conservation Area as a whole would be preserved.</p> <p>8.185 The Victoria Tower Gardens is an important open space within the CA, which provides relief from the surrounding urban environment.</p>

- 8.186 Paragraph 200 of the NPPF states that local planning authorities should look for opportunities for new development within Conservation Areas, and within the setting of heritage assets, to enhance or better reveal their significance.
- 8.187 The Proposed Development would introduce a new element which would respond to the character and appearance of this part of the Conservation Area, whilst creating a new, symbolic feature which commemorates and memorialises victims of the Holocaust.
- 8.188 The landscaping scheme preserves the wide expanse of lawn to the northern portion of the park, which forms an important contrast with the built form in this part of the Conservation Area. The new landscaping scheme introduces a gently curved mound which is reminiscent of the romantic tradition of planned landscapes. This integrates into the sinuous, sculpted form of the bronze fins, which are gradually revealed as the visitor moves toward the southern part of the park. The high quality of the designed landscape and the form of the memorial responds to that of its context, and to the importance of its symbolic purpose.
- 8.189 The addition of a memorial and learning centre within the CA is entirely appropriate, and reflective of the existing uses within the park, and the CA.
- 8.190 The basement element of the proposals would not change the contribution made by the park to the CA.
- 8.191 The Proposed Development has been carefully designed to introduce a sensitive, high quality hard and soft landscaping scheme which will be an attractive addition to the space and creating an attractive space to be enjoyed by all visitors to the park. The existing uses of the space, as a public park frequented by office workers, local residents and other visitors, will be preserved.
- 8.192 The Operational Parameters Assessment submitted with this Application identifies the northernmost gate in the park, at Black Rod's Garden, as visitors' principal access route into the park, from which point they will travel south along the footpaths towards the memorial. This also demonstrates that the increased number of visitors can be accommodated comfortably within the space. Therefore, more visitors will not materially erode the heritage value of the park and the
- Proposed Development would enable the heritage value of this aspect of the receptor to be experienced by a greater number of people.
- 8.193 The principle of establishing a National Holocaust Memorial and Learning Centre within the Conservation Area befits its existing character, and the high quality of the design would make an important contribution to its character and appearance.
- 8.194 Therefore, we consider that the overall effect of the Proposed Development on the Conservation Area would be **Moderate Beneficial**.
- 8.195 This effect would be direct, local and permanent.
- Smith Square Conservation Area*
- 8.196 The intrinsic heritage value of the Smith Square Conservation Area is derived primarily from its character as an 18th century planned development, with the former Church of St John the Evangelist (now a concert hall) at its focal point. To the east, Millbank covers an area of the river embankment to the south of Lambeth Bridge.
- 8.197 These elements, and their appreciation, would not change as a result of the Proposed Development.
- 8.198 There is the potential for some views out of the Conservation Area along Dean Stanley Street to take in part of the Proposed Development. This view is identified in the Conservation Area Appraisal, and though the positioning is incidental, frames the Buxton Memorial within the park. This element of the view would be preserved.
- 8.199 Views into the Victoria Tower Gardens are screened by the mature trees lining the boundary. The Proposed Development introduces a new element in the setting of the Conservation Area to the west.
- 8.200 The Proposed Development would not be a harmful element in the setting of the Conservation Area, and would be understood as a monument in its appropriate context.
- 8.201 The inward-focussed character, and the appearance of the Conservation Area would not change, and the appreciation of its special interest as an enclave of historic development within the heart of Westminster would be preserved.
- 8.202 Therefore, the magnitude of impact would be Negligible. The likely significant effect would be **Negligible**.
- 8.203 This effect would be direct, permanent, and local.
- Albert Embankment Conservation Area*
- 8.204 The Albert Embankment Conservation Area has a disparate character, comprising a range of new development along the historically important Albert Embankment, an important, major piece of mid-Victorian engineering and urban planning which occupies a prominent central London position along the river.
- 8.205 Views across the river towards the Westminster World Heritage Site form an important part of its setting, experienced from the riverside walk. The ability to appreciate the form and appearance of the World Heritage Site, and specifically the protected silhouette, would not change as a result of the Proposed Development. The visual assessment at **Section 10.0** provides an assessment of the visual impact of the Proposed Development.
- 8.206 Any partial views towards the Proposed Development would not represent a noticeable change in its setting. The character and appearance of the Conservation Area, and the contribution made by its setting, would be preserved.
- 8.207 Therefore, the magnitude of impact would be Negligible. The likely significant effect would be **Negligible**.
- 8.208 This effect would be direct, permanent, and local.
- Lambeth Palace Conservation Area*
- 8.209 The heritage value of the Lambeth Palace Conservation Area is derived in part from the historic relationship between the palace and that of Westminster. This relationship would not change as a result of the Proposed Development. As demonstrated at **Section 10.0**, any partial views of the Proposed Development would preserve the ability to appreciate the silhouette and form of the Palace of Westminster. Thus, the contribution made by the Site to the appreciation of the receptor's heritage value would not change.
- Therefore, the magnitude of impact would be Nil. The likely significant effect would be **Nil**.

Map Ref	Receptor	Heritage Value	Susceptibility to Change	Sensitivity	Magnitude of Impact (Site Preparation and Construction)	Likely Effect (Site Preparation and Construction)	Magnitude of Impact (Operation)	Likely Effect (Operation)
World Heritage Site								
106	Palace of Westminster, Westminster Abbey and St Margaret's Church World Heritage Site	Exceptional	Medium	High	Negligible	Negligible	Low	Moderate Beneficial
Listed Buildings								
1	Victoria Tower Lodge and gates to Black Rod Garden	High	Medium	Moderate/High	Negligible	Negligible	Negligible	Negligible
2	Statuary Group of the Burgurers of Calais	High	Medium	Moderate/High	Low	Temporary Minor Adverse	Medium	Moderate Beneficial
14	Houses of Parliament and the Palace of Westminster	High	Medium	Moderate/High	Negligible	Negligible	Medium	Moderate Beneficial
18	Westminster Abbey (the Collegiate Church of St Peter)	High	Low	Moderate	Negligible	Negligible	Negligible	Negligible
16	St John's Smith Square Concert Hall	High	Low	Moderate	Negligible	Negligible	Negligible	Negligible
19	Statue of Robert Clayton and north entrance to ward block of north wing of St Thomas' Hospital	High	Low	Moderate	Neutral	Nil	Neutral	Nil
22	Buxton Memorial Fountain, Victoria Tower Gardens	High	Medium	Moderate/High	Low	Temporary Minor Adverse	Medium	Moderate Beneficial
24	Bronze Statue of Edward VI at north entrance to ward block of North Wing at St Thomas' Hospital	High	Low	Moderate	Neutral	Nil	Neutral	Nil
31	6, 7-9 Smith Square SW1	High	Low	Moderate	Negligible	Negligible	Negligible	Negligible
	1 and 2 Smith Square	High	Low	Moderate	Negligible	Negligible	Negligible	Negligible
	3-5 Smith Square	High	Low	Moderate	Negligible	Negligible	Negligible	Negligible
35	The Church Commissioners	High	Medium	Moderate/ High	Negligible	Negligible	Negligible	Negligible
37	9, Little College Street, SW1	High	Low	Moderate	Negligible	Negligible	Negligible	Negligible
39	Knife Edge Two Piece Sculpture	High	Low	Moderate	Negligible	Negligible	Negligible	Negligible
52	Block 9 of St Thomas' Hospital Medical School	Medium	Low	Low/Moderate	Negligible	Negligible	Negligible	Negligible
54	Fifteen Public Benches on Embankment footpath between Lambeth Bridge and Westminster Bridge	Medium	Low	Low/ Moderate	Negligible	Negligible	Negligible	Negligible
56	Wall along western boundary of St Thomas' Hospital	Medium	Low	Low/ Moderate	Negligible	Negligible	Negligible	Negligible
62	2 bollards flanking junction of Smith Square and Lord North street, and 13 bollards on pavement curb surrounding St John's Smith Square Concert Hall	Medium	Low	Low/ Moderate	Neutral	Nil	Neutral	Nil
63	Norwest House	Medium	Medium	Moderate	Negligible	Negligible	Negligible	Negligible
72	Millbank Tower	Medium	Low	Low/ Moderate	Negligible	Negligible	Negligible	Negligible
74	K6 telephone kiosk, Lambeth Palace Road/ Albert Embankment	Medium	Low	Low/ Moderate	Neutral	Nil	Neutral	Nil

79	7 Lampstandards numbered G4, 5 and 6 and G9, 10 11 and 12	Medium	Low	Low/ Moderate	Neutral	Nil	Neutral	Nil
81	Thames House (north and south blocks with bridge link)	Medium	Low	Low/ Moderate	Neutral	Nil	Negligible	Negligible
86	lamp standard numbered G1 on corner of Smith Square	Medium	Low	Low/ Moderate	Neutral	Nil	Neutral	Nil
96	River Embankment from the Houses of Parliament to Lambeth Bridge	Medium	Low	Low/ Moderate	Low	Temporary Minor Adverse	Medium	Minor Beneficial
97	Statue of Mrs Emmeline Pankhurst	Medium	Low	Low/Moderate	Low	Temporary Minor Adverse	Negligible	Negligible
99	South Wing at St Thomas' Hospital excluding post-1926 courtyard infill buildings	Medium	Low	Low/ Moderate	Negligible	Negligible	Negligible	Negligible
Registered Parks and Gardens								
110	Victoria Tower Gardens	Medium	Medium	Moderate	Low	Temporary Minor Adverse	High	Moderate Beneficial
Conservation Areas								
B	Westminster Abbey and Parliament Square Conservation Area	High	Medium	Moderate/ High	Low	Temporary Minor Adverse	Medium	Moderate Beneficial
C	Smith Square Conservation Area	High	Low	Moderate	Negligible	Negligible	Negligible	Negligible
E	Albert Embankment Conservation Area	Medium	Low	Low/ Moderate	Negligible	Negligible	Negligible	Negligible
F	Lambeth Palace Conservation Area	High	Low	Low/ Moderate	Neutral	Nil	Neutral	Nil

Table 8.1 Heritage Receptor Effects

// NATIONAL HOLOCAUST MEMORIAL



Assessment: Townscape

## 9.0 ASSESSMENT: TOWNSCAPE

- 9.1 This section assesses the effect of the Proposed Development on the townscape character areas identified in **Table 6.1**.
- 9.2 A qualitative assessment is provided below. A summary of the effects arising from impacts to townscape receptors is provided at **Table 8.1**.
- Site Preparation and Construction Phase**
- 9.3 ES Section 2, Volume 2 describes the anticipated programme of works and activities to be undertaken on the Site during the construction phase, which is necessary to facilitate the development. The site preparation and construction phase is anticipated to last up to 36 months.
- 9.4 The Site would be enclosed with hoardings during the phase, which will provide a visual buffer to the immediate environment, and result in reduced views through the park. The phase will also likely result in increased noise, vibration, dust and traffic in the surrounding area. The magnitude of this impact will be greatest within the contained space of Victoria Tower Gardens, and along Abingdon Street to the west, a popular tourist route and heavily used thoroughfare through the area.
- 9.5 Throughout the construction phase safe pedestrian access and routes would be maintained by contractors where possible, where any path closures are required these would be short term. On completion of the construction works all plant, materials, vehicles, and temporary hoardings, would be removed.
- 9.6 The construction works would be temporary in nature and would be controlled by the mitigation measures outlined above and in Section 7.
- 9.7 Any effects would be temporary and are the necessary first steps to enable the proposed development.
- 9.8 The effects of the construction phase of the Proposed Development are considered to have a temporary Negligible effect on the value of townscape receptors surrounding the application Site.
- 9.9 Character Area 1 is primary in public use and, whilst disruptive, the works would be primarily experienced by people moving through the area, as well as by vehicular traffic along Abingdon Street/Millbank.
- 9.10 The continued functioning of the local area is an important consideration for the vitality of the townscape, particularly given the governmental function of the Houses of Parliament, and high volume of visitors to Westminster. Construction activity would have a temporary adverse impact on the function of this townscape character area. The proposed mitigation measures would reduce the disruption caused by construction and site preparation. However, the construction works are considered to potentially result in some temporary adverse effects such as the presence of construction activity within and around the application Site. Overall, it is considered there would be a low magnitude of impact to Townscape Character Area 1, given the moderate sensitivity of the receptor there would be a temporary Minor Adverse effect on the value of the receptor.
- Operational Phase**
- 9.11 An assessment of the direct and indirect effects of the completed development on townscape receptors forming part of this assessment is provided below. This assessment has been informed by the Accurate Visual Representations contained in Section 10 and Technical **Appendix 1.2** and relevant application supporting information including the Design and Access Statement and architectural plans prepared by Adjaye Associates.
- 9.12 We consider the Proposed Development in relation to the townscape character areas described in **Section 6** below. The townscape baseline assessment identifies 11 townscape character areas of varying sensitivity, and a plan of these is reproduced at **Technical Appendix 1.1: Figure 1.1.3: Townscape Character Area Plan**. These character areas include recognised heritage designations, and have been defined in relation to their characteristic uses, physical traits and building types and forms.
- Character Area 1: Victoria Tower Gardens**
- 9.13 The garden is a Grade II registered park and garden and contains a series of listed buildings, as well as being located within a Conservation Area and within the setting of the Westminster World Heritage Site. **The character area boundary is clearly defined by the River Thames to the East and the highway of Millbank to the west. Section 6.0** identifies the townscape as having a **High** value. Its susceptibility to change is considered to be medium and its sensitivity to change overall is moderate.
- 9.14 The character area has a dense tree canopy, which limits views to the west and south. The gardens have a recognisable context of green space set within a wider urban environment. Perceptible from the park is the Houses of Parliament to the North, and the four - eight storey buildings which front onto Millbank.
- 9.15 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.
- 9.16 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.
- 9.17 Overall, the creation of a new memorial with associated landscaping complements the use and functioning of the existing character area. There will be greater vitality and activity, including more visitors to Victoria Tower Gardens, the impact of whom will be mitigated through careful 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 Victoria Tower Gardens, 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.

- 9.18 The Proposed Development would form a congruent and attractive addition to the townscape. It will demonstrably improve the character, appearance and function of the area. Overall the Proposed Development would result in a high magnitude of impact to the receptor. Overall the Proposed Development would have a Moderate Beneficial effect because it will introduce high quality design, and improve the character appearance and overall functionality of the area.
- Character Area 2: Westminster World Heritage Site and Parliament Square**
- 9.19 Character Area 2 is located to the north of the Site. The character area is made up of a World Heritage Asset; consisting of the Palace of Westminster, Westminster Abbey and St. Margaret's Church. The historical, cultural and architectural significance of the area is represented through other historical assets, including conservation areas, listed buildings, scheduled monuments and registered parks and gardens. **Section 6.0** identifies the townscape as having Exceptional townscape value. Its susceptibility to change is considered to be medium and its sensitivity to change overall is high.
- 9.20 The Proposed Development will be primary be visible from this character along Abingdon Street, though views of the Proposed Development would be partially screened by the dense tree canopy around Victoria Tower Gardens. The Proposed Development will have a limited impact to the character and appearance of this character area.
- 9.21 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.
- 9.22 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. 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.
- 9.23 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.
- 9.24 Overall the Proposed Development would result in a low magnitude of impact to the receptor. Overall the Proposed Development would have a Moderate Beneficial effect.
- Character Area 3a: Millbank**
- 9.25 Character Area 3a comprises of the dense commercial development around Millbank and Horseferry Road, the majority of which compromise of governmental buildings. Buildings primarily consists of 20th and 21st development, which on average are between eight and ten storeys high. The 33 storeys Millbank Tower to the south of the character area acts a landmark in the area feature in the area and adds in creating an interesting townscape. **Section 6.0** identifies the townscape as having a Medium value. The susceptibility to change is low. The overall sensitivity of the character area is low.
- 9.26 Character Area 3a is located to the south/south-west of the Site. Due to the high density of buildings, there will be limited views of the Site from the receptor. The Proposed Development will primarily be visible along Millbank. Within the foreground the Proposed Development would be restricted to glimpses through gaps in the tree canopy around Victoria Tower Gardens.
- 9.27 The Proposed Development will be identifiable by its high quality and architectural design, situated within a landscaped setting. The Proposed Development will have a limited impact to the character and appearance of the area.
- 9.28 Overall the Proposed Development would result in a low magnitude of impact to the receptor. Overall the Proposed Development would have a Minor Beneficial effect.
- Character Area 3b: Victoria Gardens South**
- 9.29 Character Area 3b comprises of a Victoria Gardens, a small grassed area, located to along Millbank, to the south of the Lambeth Bridge. The small character area features mature planting and public benches which are orientated away from the application Site and overlook the River Thames. **Section 6.0** identifies the townscape as having a **Medium** value. The susceptibility to change is considered to be low. The overall sensitivity of the character area is low.
- 9.30 The Proposed Development would not be readily discernible from within the character area and would generally obscured by the interposing Lambeth Bridge and embankment. Overall the Proposed Development would result in a negligible magnitude of impact to the receptor. Overall the Proposed Development would have a Negligible effect.

#### Character Area 4: The River Thames

- 9.31 Character Area 4 is made up of the River Thames and consist of the river running north to south from Westminster Bridge to an area south of the Fire Brigade at the Albert Embankment. The river is heavily trafficked with a range of boats including pleasure crafts, water buses and emergency craft. A number of piers protrude into the riverscape, including the Fire Brigade pier at the Albert Embankment and the Westminster Embankment. **Section 6.0** identifies the townscape as having a **Medium** value. The susceptibility to change is considered to be low. The overall sensitivity of the character area is low.
- 9.32 The rivers forms a key route through London and the character and appearance differentiates the area from the surrounding townscape. Within the middle ground the Proposed Development would be glimpsed between the boats along with the River Thames. The Proposed Development would further be restricted to glimpses through gaps in the tree canopy around Victoria Tower Gardens. The views in Section 10 demonstrate that, where partially visible, the Proposed Development would been of considerably smaller scale than the existing development within the background and fronting the river. When visible, the Proposed Development will be identifiable by its high quality and architectural design, situated within a landscaped setting. The Proposed Development will have a limited impact to the character and appearance of the area.
- 9.33 Overall the Proposed Development would result in a low magnitude of impact to the receptor. Overall the Proposed Development would have a Minor Beneficial effect. The high quality of the architecture and landscaping of the Proposed Development would improve the overall character and appearance of Victoria Tower Gardens where visible from the river and would add interest to the existing townscape.

#### Character Area 5: St Thomas' Hospital

- 9.34 Character Area 5 contains the St Thomas' Hospital, which is made up of 19th, 20th and 21st century buildings. The buildings which form part of the hospital vary in architectural style, scale and massing. The character area is bound to east by Lambeth Place Road (A3036) and to the west by the River Thames. **Section 6.0** identifies the character area as having **Medium** townscape value. The susceptibility to change is considered to be low. The overall sensitivity of the character area is low.

- 9.35 The Proposed Development will have limited impact on the character and appearance of the character area due to the separating distance and screening providing by existing mature trees. Within the foreground the Proposed Development would be glimpsed between the boats along with the River Thames. Within the middle ground, the Proposed Development would be further restricted to glimpses through gaps in the tree canopy around Victoria Tower Gardens. When visible, it would be seen within the context of existing development along the river and behind Victoria Tower Gardens, which is of a higher density and scale.
- 9.36 Overall the Proposed Development would result in a low magnitude of impact to the receptor. Overall the Proposed Development would have a Minor Beneficial effect. The high quality of the architecture and landscaping of the Proposed Development would improve the overall character and appearance of Victoria Tower Gardens where visible from this character area and would add interest to the existing townscape.

#### Character Area 7: Albert Embankment

- 9.37 Character Area 7 comprises of development fronting onto Albert Embankment and the A3036. The busy traffic route along the A3036 and the roundabout are a prominent feature which isolate the character area from the riverscape. The residential and commercial buildings within the character area are characterised by late 20th and 21st century development. The character area borders with the River Thames and Lambeth Bridge. **Section 6.0** identifies the character area as having Medium townscape value. The susceptibility of the character area to change is considered to be low. The overall sensitivity of the character area is low.
- 9.38 Proposed Development will have limited impact on the character and appearance of the character area due to the separating distance and screening providing by existing mature trees. When visible, it would be seen within the context of existing development, which is of much larger scale lining the riverbank and in the background of Victoria Tower Gardens. The Proposed Development will be identifiable by its high quality architectural design, situated within a landscaped setting, which will add interest to the existing townscape.
- 9.39 Overall the Proposed Development would result in a low magnitude of impact to the receptor. Overall the Proposed Development would have a Minor Beneficial effect.

#### Character Area 10: Smith Square

- 9.40 Character area 10 is situated to the west of the Site. Smith Square forms a focal point of the area, characterised by an 18th century streets and residential development. **Section 6.0** identifies the character area as having **Medium** townscape value. The susceptibility of the character area to change is considered to be low. The overall sensitivity of the character area is low.
- 9.41 The Proposed Development will have a limited impact on the character and appearance of the area. Between the Site and the character area there are a series of large buildings of between 4 and 8 storeys, which would obscure the Proposed Development from views out of the character area. The Proposed Development would potentially be glimpsed when looking east down Great Peter Street and Dean Stanley Street. The design of the proposals has sought to maintain the axial view along Dean Stanley Street of Victoria Tower Gardens and the Buxton Memorial, though these views are often obscured by vehicular traffic and partly screened by the mature trees and hedgerow and fencing around Victoria Tower Gardens.
- 9.42 Where discernible the Proposed Development would form a sympathetic contextual response and attractive addition to the townscape. 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 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.
- 9.43 Overall the Proposed Development would result in a low magnitude of impact to the receptor. Overall the Proposed Development would have a Minor Beneficial effect.

Map Ref	Name	Townscape Value	Susceptibility to Change	Sensitivity	Magnitude of Impact (Site Preparation and Construction)	Likely Effect (Site Preparation and Construction)	Magnitude of Impact (Operation)	Likely Effect (Operation)
1	Victoria Tower Gardens	High	Medium	Moderate	Low	Temporary Minor Adverse	High	Moderate Beneficial
2	Westminster World Heritage Site and Parliament Square	Exceptional	Medium	High	Negligible	Temporary Negligible	Low	Moderate Beneficial
3a	Millbank	Medium	Low	Low	Negligible	Temporary Negligible	Low	Minor Beneficial
3b	Victoria Gardens South	Medium	Low	Low	Negligible	Temporary Negligible	Negligible	Negligible
4	The River Thames	Medium	Low	Low	Negligible	Temporary Negligible	Low	Minor Beneficial
5	St Thomas' Hospital	Medium	Low	Low	Negligible	Temporary Negligible	Low	Minor Beneficial
7	Albert Embankment	Medium	Low	Low	Negligible	Temporary Negligible	Low	Minor Beneficial
10	Smith Square	Medium	Low	Low	Negligible	Temporary Negligible	Low	Minor Beneficial

Table 9.1 Townscape Receptor Effects



// NATIONAL HOLOCAUST MEMORIAL



Assessment: Visual

## 9.0 ASSESSMENT: VISUAL

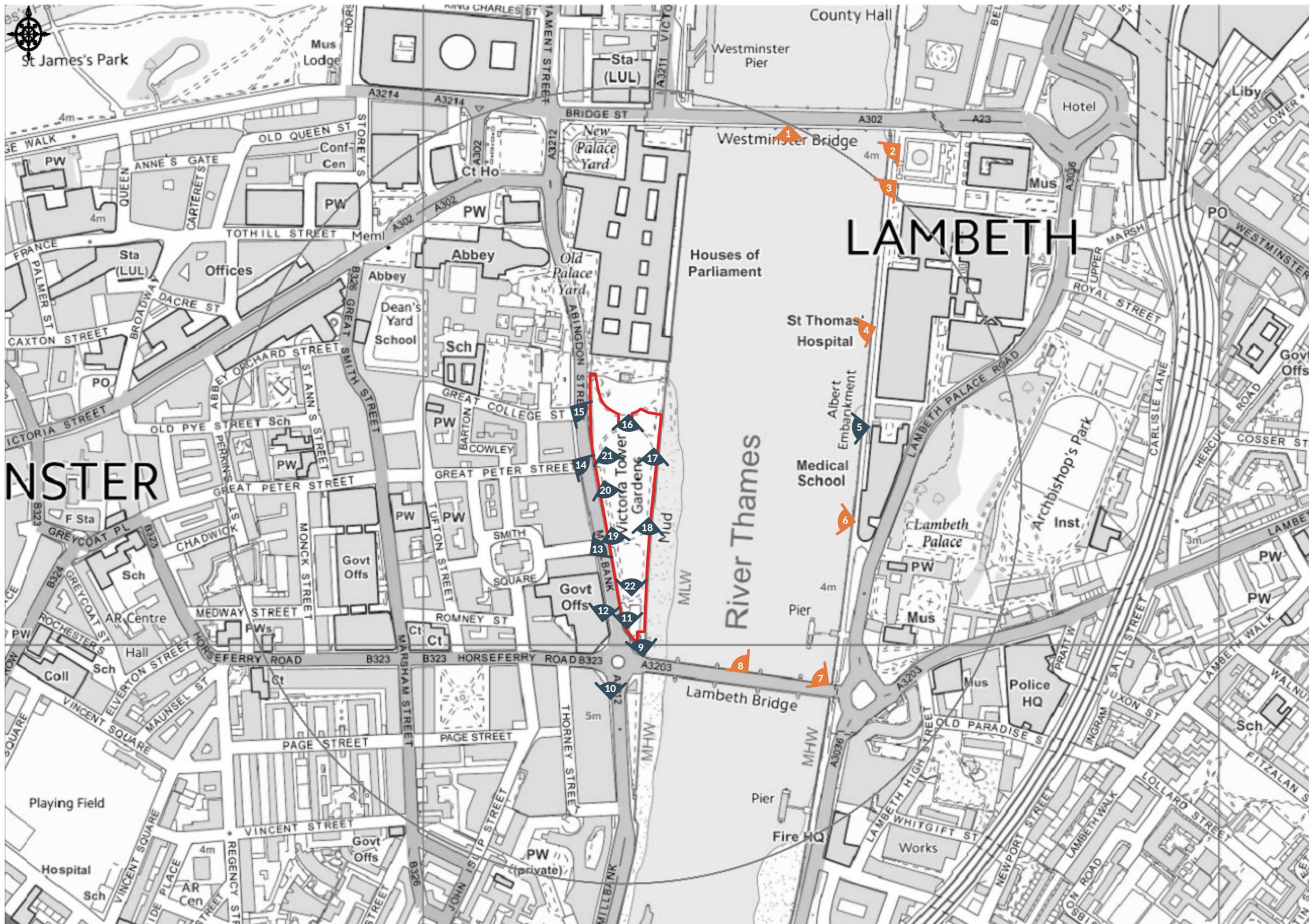
- 9.1 This section assesses the likely effect of the Development on the visual receptors identified in Table 9.1. For ease of reference the ViewLocation Plan is re-provided at the start of this section (Figure 9.1).
- 9.2 Paragraph 6.14 of GLVIA3 states that *“People generally have differing responses to changes in views and visual amenity depending on the context (location, time of day, season, degree of exposure to views) and purpose for being in a particular place (for example recreation, residence or employment, or passing through on roads or by other modes of transport). During passage through the landscape, certain activities or locations may be specifically associated with the experience and enjoyment of the landscape, such as the use of paths, tourist or scenic routes and associated viewpoints.”*
- 9.3 Therefore, not all visual receptors will necessarily experience a view in the same way, and a discursive analysis is appropriate.
- Site Preparation and Construction Phase**
- 9.4 Following the adoption of the identified mitigation measures in the Construction Management Plan (Appendix C), the presence of hoardings and construction activity is likely to still result in minor adverse effects depending on the extent of the role of the application Site in relation to visual receptors. Any effects would however be temporary and are considered to be an expected part of a development site within a central London location.
- 9.5 These effects are the necessary first steps to enable the Proposed Development and would be removed following completion. In visual impact assessments generally, construction effects, being short to medium-term, are treated as less significant.
- 9.6 In views from Victoria Tower Gardens clear views of the Site are possible and, despite the presence of hoardings, construction activity is likely to still result in temporary adverse effects on View nos. 9, 11, 12, 13, 22, 18, 19, 21, 20, 16 and 17. These effects would however be temporary and are considered to be an expected part of a development site within a central London location.
- 9.7 The application Site would be visible in views located within the local vicinity of the Site, these views include View nos. 10, 14 and 15. Due to mitigation the majority of construction activities would be screened by hoardings and the mature trees and landscape boundary surrounding Victoria Tower Gardens. The significance of effect on these views would be temporary Negligible.
- 9.8 The application Site would be partially, seasonally obscured by dense tree cover in distant views located within the wider vicinity of the Site, these views include View nos. 1, 2, 3, 4, 5, 6, 7 and 8, and construction activities would be contained within the Application Site. Due to the distance from the application Site and interposing development and landscape features the significance of effect would be temporary Negligible.
- Summary**
- 9.9 **Table 9.1** below summarises our conclusions regarding the visual effects of the Proposed Development.
- 9.10 Whilst each of the viewpoints at **Section 10.0** is represented as a snapshot image, these would, in practice, be experienced by the visitor as part of a continuous sequence of kinetic views. To analyse each as an isolated frame creates a misleading impression overall.
- 9.11 **Viewpoints 10, 12, 13, 14 and 15** seek to illustrate the experience of visual receptors traveling along Millbank and Abingdon Street. The memorial has a greater impact on views closer to the south of the park, where it is located, and would be understood as a symbolic, visually striking addition to the visual experience. This would correspondingly result in a loss of the open character of the park from some positions along the road, though this would be preserved in others, and enhanced through the high quality scheme of landscaping.
- 9.12 As shown in the sequence of views at **16, 17, 18, 19, 20 and 21**, within the park itself, the aesthetic experience would develop as the viewer moved from the north to the south of the park, or vice versa. Viewed from the north, the monument forms a romantic, softly curved landscape. The raised bronze fins, and the expressive, powerful form of the monument, is gradually revealed as the viewer travels towards the south. These contrasting forms are part of the competition-winning design and contribute to an intentional aesthetic experience. Towards the south of the park, there are some adverse impacts from a sense of congestion close to the steps to Lambeth Bridge, and this is reflected in the analysis of **viewpoints 9 and 11**.
- 9.13 **Viewpoint 22** shows the entrance to the proposed memorial within the courtyard, from which position the direct view of the sculptural fins forms part of the profound visitor experience within the courtyard.
- 9.14 Below, we provide an assessment of each individual viewpoint, including those views designated in the LVMF.

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)	Likely Effect (Cumulative)
1	LVMF 18A.2 – Westminster Bridge Upstream	Exceptional	Pedestrians	Medium	High	Negligible	Temporary Negligible	Negligible	Negligible	Negligible
			Road Users	Low	Moderate	Negligible	Temporary Negligible	Negligible	Negligible	Negligible
2	LVMF 18A.1 – Westminster Bridge Upstream	Exceptional	Pedestrians	Medium	High	Negligible	Temporary Negligible	Negligible	Negligible	Negligible
			Road Users	Low	Moderate	Negligible	Temporary Negligible	Negligible	Negligible	Negligible
3	LVMF 22A.3 – Albert Embankment opposite the Palace of Westminster	Exceptional	Pedestrians	Medium	High	Negligible	Temporary Negligible	Nil	Nil	Nil
			Visitors to the area	Medium	High	Negligible	Temporary Negligible	Nil	Nil	Nil
4	LVMF 22A.2 – Albert Embankment opposite the Palace of Westminster	Exceptional	Pedestrians	Medium	High	Negligible	Temporary Negligible	Nil	Nil	Nil
			Visitors to the area	Medium	High	Negligible	Temporary Negligible	Nil	Nil	Nil
5	River Thames: Summer	High	Pedestrians	Medium	Moderate	Negligible	Temporary Negligible	Nil	Nil	Nil
	Winter	High	Pedestrians	Medium	Moderate	Negligible	Temporary Negligible	Negligible	Negligible	Negligible
6	LVMF 22A.1 – Albert Embankment opposite the Palace of Westminster: Summer	Exceptional	Pedestrians	Medium	High	Negligible	Temporary Negligible	Nil	Nil	Nil
			Visitors to the area	Medium	High	Negligible	Temporary Negligible	Nil	Nil	Nil
	LVMF 22A.1 – Albert Embankment opposite the Palace of Westminster: Winter	Exceptional	Pedestrians	Medium	High	Negligible	Temporary Negligible	Negligible	Negligible	Negligible
			Visitors to the area	Medium	High	Negligible	Temporary Negligible	Negligible	Negligible	Negligible
7	LVMF 19A.2 – Lambeth Bridge downstream: Summer	Exceptional	Pedestrians	Medium	High	Negligible	Temporary Negligible	Negligible	Negligible	Negligible
			Road users	Low	Moderate	Negligible	Temporary Negligible	Negligible	Negligible	Negligible
			Visitors to the area	Medium	High	Negligible	Temporary Negligible	Negligible	Negligible	Negligible
	LVMF19A.2 – Lambeth Bridge downstream: Winter	Exceptional	Pedestrians	Medium	High	Negligible	Temporary Negligible	Negligible	Negligible	Negligible
			Road users	Low	Moderate	Negligible	Temporary Negligible	Negligible	Negligible	Negligible
			Visitors to the area	Medium	High	Negligible	Temporary Negligible	Negligible	Negligible	Negligible
8	LVMF 19A.1 – Lambeth Bridge downstream: Summer, Daytime	Exceptional	Pedestrians	Medium	High	Negligible	Temporary Negligible	Negligible	Negligible	Negligible
			Road users	Low	Moderate	Negligible	Temporary Negligible	Negligible	Negligible	Negligible
			Visitors to the area	Medium	High	Negligible	Temporary Negligible	Negligible	Negligible	Negligible
	LVMF 19A.1 – Lambeth Bridge downstream: Summer, Night Time	Exceptional	Pedestrians	Medium	High	Negligible	Temporary Negligible	Negligible	Negligible	Negligible
			Road users	Low	Moderate	Negligible	Temporary Negligible	Negligible	Negligible	Negligible
			Visitors to the area	Medium	High	Negligible	Temporary Negligible	Negligible	Negligible	Negligible
	LVMF19A,1 – Lambeth Bridge downstream: Winter, Daytime	Exceptional	Pedestrians	Medium	High	Negligible	Temporary Negligible	Negligible	Negligible	Negligible
			Road Users	Low	Moderate	Negligible	Temporary Negligible	Negligible	Negligible	Negligible
			Visitors to the area	Medium	High	Negligible	Temporary Negligible	Negligible	Negligible	Negligible
	LVMF 19A.1 – Lambeth Bridge downstream: Winter, Night Time	Exceptional	Pedestrians	Medium	High	Negligible	Temporary Negligible	Negligible	Negligible	Negligible
			Road users	Low	Moderate	Negligible	Temporary Negligible	Negligible	Negligible	Negligible
			Visitors to the area	Medium	High	Negligible	Temporary 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)	Likely Effect (Cumulative)
9	TC4	Low	Pedestrians	Medium	Moderate	Low	Temporary Minor Adverse	Low	Minor Adverse	Minor Adverse
			Users of amenity space	Medium	Moderate	Low	Temporary Minor Adverse	Low	Minor Adverse	Minor Adverse
10	MI5	Low	Pedestrians	Medium	Moderate	Negligible	Temporary Negligible	Negligible	Negligible	Negligible
			Road Users	Low	Low	Negligible	Temporary Negligible	Negligible	Negligible	Negligible
11	Millbank towards north	Low	Pedestrians	Medium	Moderate	Low	Temporary Minor Adverse	Low	Minor Adverse	Minor Adverse
			Road Users	Low	Low	Low	Temporary Minor Adverse	Low	Minor Adverse	Minor Adverse
12	Horseferry Road	Low	Pedestrians	Medium	Moderate	Low	Temporary Minor Adverse	Low	Minor Adverse	Minor Adverse
			Road Users	Low	Low	Low	Temporary Minor Adverse	Low	Minor Adverse	Minor Adverse
13	Dean Stanley Street	Medium	Pedestrians	Medium	Moderate	Low	Temporary Minor Adverse	Medium	Moderate Adverse	Moderate Adverse
			Road Users	Low	Low	Low	Temporary Minor Adverse	Medium	Moderate Adverse	Moderate Adverse
14	Great Peter Street	Low	Pedestrians	Medium	Moderate	Negligible	Temporary Negligible	Medium	Moderate Beneficial	Moderate Beneficial
			Road Users	Low	Low	Negligible	Temporary Negligible	Medium	Moderate Beneficial	Moderate Beneficial
15	Great College Street	Low	Pedestrians	Medium	Low	Negligible	Temporary Negligible	Medium	Minor Beneficial	Minor Beneficial
			Road users	Low	Low	Negligible	Temporary Negligible	Medium	Minor Beneficial	Minor Beneficial
16	TC6A	Medium	Users of Amenity Space	Medium	Moderate	Low	Temporary Minor Adverse	Medium	Moderate Beneficial	Moderate Beneficial
			Pedestrians	Low	Moderate	Low	Temporary Minor Adverse	Medium	Moderate Beneficial	Moderate Beneficial
17	TC3B	Medium	Users of Amenity Space	Medium	Moderate	Low	Temporary Minor Adverse	Medium	Moderate Beneficial	Moderate Beneficial
			Pedestrians	Low	Moderate	Low	Temporary Minor Adverse	Medium	Moderate Beneficial	Moderate Beneficial
18	TC3A: Day time	Medium	Users of Amenity Space	Medium	Moderate	Low	Temporary Minor Adverse	Medium	Moderate beneficial	Moderate beneficial
			Pedestrians	Low	Moderate	Low	Temporary Minor Adverse	Medium	Moderate beneficial	Moderate beneficial
	TC3A: Night Time	Medium	Users of Amenity Space	Medium	Moderate	Low	Temporary Minor Adverse	Medium	Moderate beneficial	Moderate beneficial
			Pedestrians	Low	Moderate	Low	Temporary Minor Adverse	Medium	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)	Likely Effect (Cumulative)
19	Victoria Tower Gardens: Daytime	Low	Users of Amenity Space	Medium	Low	Low	Temporary Minor Adverse	Medium	Minor Adverse	Minor Adverse
			Pedestrians	Medium	Low	Low	Temporary Minor Adverse	Medium	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
			Pedestrians	Medium	Low	Low	Temporary Minor Adverse	Medium	Minor Adverse	Minor Adverse
20	TC6D	Medium	Users of Amenity Space	Medium	Moderate	Low	Temporary Minor Adverse	Medium	Moderate Beneficial	Moderate Beneficial
			Pedestrians	Medium	Moderate	Low	Temporary Minor Adverse	Medium	Moderate Beneficial	Moderate Beneficial
21	TC6C	Medium	Users of Amenity Space	Medium	Moderate	Low	Temporary Minor Adverse	Medium	Moderate Beneficial	Moderate Beneficial
			Pedestrians	Medium	Moderate	Low	Temporary Minor Adverse	Medium	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
			Pedestrians	Medium	Moderate	Low	Temporary Minor Adverse	High	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
			Pedestrians	Medium	Moderate	Low	Temporary Minor Adverse	High	Moderate Beneficial	Moderate Beneficial

Table 9.1 Visual Receptor Summary



**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



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[www.montagu-evans.co.uk](http://www.montagu-evans.co.uk)

**Location:**  
 Holocaust Memorial, Victoria Tower Gardens

**Date:**  
 December 2018

**Scale:**  
 1:5,000 @ A3

**Figure 9.1** View Location Plan

North

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

- 9.15 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.”*
- 9.16 The value attached to the view is Exceptional.
- 9.17 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.
- 9.18 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**

- 9.19 The Proposed Development would be obscured by the existing built form of the embankment, and the dense vegetation within the park.
- 9.20 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.
- 9.21 The magnitude of impact would be Negligible.
- 9.22 The overall effect would be **Negligible**. The effect would be direct, local and permanent.



**CUMULATIVE**

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





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

9.24 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.”*

9.25 The value attached to the view is Exceptional.

9.26 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.

9.27 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**

- 9.28 The Proposed Development would be obscured by the existing built form of the embankment, and the dense vegetation within the park.
- 9.29 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.
- 9.30 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.
- 9.31 The magnitude of impact would be Negligible.
- 9.32 The overall effect would be **Negligible**. The effect would be direct, local and permanent.



**CUMULATIVE**

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





**VIEW 3: LVMF 22A.3 – ALBERT EMBANKMENT OPPOSITE PALACE OF WESTMINSTER****EXISTING**

- 9.34 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.”*
- 9.35 The value attached to the view is Exceptional.
- 9.36 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**

- 9.37 The Proposed Development would be obscured by the existing built form of the embankment, and the dense vegetation within the park.
- 9.38 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 be preserved.
- 9.39 The magnitude of effect would be **Nil**.
- 9.40 The overall effect would be **Nil**. The effect would be direct, local and permanent.



**CUMULATIVE**

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





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

- 9.42 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.”*
- 9.43 The value attached to the view is Exceptional.
- 9.44 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**

- 9.45 The Proposed Development would be obscured by the existing built form of the embankment, and the dense vegetation within the park.
- 9.46 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 be preserved.
- 9.47 The magnitude of impact would be **Nil**.
- 9.48 The overall effect would be **Nil**. The effect would be direct, local and permanent.



**CUMULATIVE**

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





**VIEW 5: RIVER THAMES****EXISTING: SUMMER**

- 9.50 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.
- 9.51 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.
- 9.52 Some development is visible behind the tree line, along Millbank, which befits the city centre location, and forms part of the
- 9.53 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.
- 9.54 The value attached to the view is High.
- 9.55 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**

- 9.56 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.
- 9.57 The overall character of the view is the same in the winter condition. The value does not change.



**PROPOSED: SUMMER**

- 9.58 The Proposed Development would be largely obscured by the existing built form of the embankment, and the dense vegetation within the park.
- 9.59 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.
- 9.60 The focus of the view would remain on the Houses of Parliament, and the mature trees along the embankment would remain a distinct element.
- 9.61 The magnitude of impact would be **Nil**.
- 9.62 The effect would be direct, local and permanent.



**PROPOSED: WINTER**

- 9.63 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.
- 9.64 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.
- 9.65 The effect would be **Negligible**.
- 9.66 The effect would be direct, local and permanent.



**CUMULATIVE: SUMMER**

9.67 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**

- 9.68 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.
- 9.69 Therefore, in the cumulative condition, the effect would remain **Negligible**.



**VIEW 6: LVMF 22A.1: ALBERT EMBANKMENT OPPOSITE THE PALACE OF WESTMINSTER - SUMMER****EXISTING: SUMMER**

- 9.70 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.”*
- 9.71 The value attached to the view is Exceptional.
- 9.72 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**

- 9.73 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.
- 9.74 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.
- 9.75 The winter condition allows for some partial views towards the Buxton Memorial from this perspective, which add interest to the space within the park.
- 9.76 The overall character of the view is the same in the winter condition. The value does not change.



**PROPOSED: SUMMER**

- 9.77 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.
- 9.78 The magnitude of impact would be **Nil**.
- 9.79 The effect would be direct, local and permanent.



**PROPOSED: WINTER**

- 9.80 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.
- 9.81 The Palace of Westminster and protected silhouette would remain pre-eminent in the view.
- 9.82 The overall effect would be **Negligible**.
- 9.83 The effect would be direct, local and permanent.



**CUMULATIVE: SUMMER**

9.84 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**

- 9.85 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.
- 9.86 Therefore, in the cumulative condition, the effect would remain **Negligible**.



## VIEW 7: LVMF 19A.2: LAMBETH BRIDGE DOWNSTREAM - SUMMER

## EXISTING

- 9.87 The view is described in the LVMF thus:  
*“The river dominates the foreground and middle ground of the view, with the Palace of Westminster forming the focus. Other important elements in the view are the mature trees on both sides of the river. The intensity of riverside buildings north of Westminster Bridge and east into the City of London, is secondary in this view to the visually ‘semi-pastoral’ setting of the World Heritage Site. No development crowds in close to the World Heritage Site, with only the towers of Westminster Abbey interacting with it to the left of the view (the roof of the Abbey also being visible through the trees in winter). A group of prominent, similarly sized buildings on the riverfront, which includes Whitehall Court, Embankment Place, Adelphi House and Shell Mex House, can also be seen in this view. These are underscored by Westminster Bridge, while other prominent buildings – including the London Eye, the former County Hall, St Thomas’ Hospital are seen on the Lambeth Site of the river.”*
- 9.88 The value attached to the view is Exceptional.
- 9.89 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 Medium susceptibility to change and Moderate sensitivity.
- 9.90 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.



**EXISTING: WINTER**

- 9.91 In winter, the character and focus of the view remains the same, with the Palace of Westminster and Westminster Abbey visible within a 'semi-pastoral' setting. As noted in the LVMF description, Westminster Abbey is partially visible in the winter condition, and contributes to the appreciation of the WHS in the view.
- 9.92 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.
- 9.93 The winter condition also allows for some partial views towards the Buxton Memorial from this perspective, which add interest to the space within the park.
- 9.94 The overall character of the view is the same in the winter condition. The value does not change.



**PROPOSED: SUMMER**

- 9.95 The Proposed Development is shown in wireline in its entirety, including the basement element, which would be below ground, and thus have no effect on visual receptors from this perspective.
- 9.96 Views of the above-ground elements of the Proposed Development would be filtered through the dense tree line on the eastern side of the Victoria Tower Gardens.
- 9.97 Partial views of the memorial would not change the primacy of the World Heritage Site buildings in the view, or the 'semi-pastoral' character of their setting. The scale of the proposals is well below the tree line, and the material palette integrates the development into the park space.
- 9.98 The magnitude of impact would be Negligible.
- 9.99 The Proposed Development would give rise to a **Negligible** effect on visual receptors. The effect would be direct, local and permanent.



**PROPOSED: WINTER**

- 9.100 In the winter condition, the Proposed Development would remain partially screened from view by the tree line along the east side of Victoria Tower Gardens. Views towards the Buxton Memorial would not change.
- 9.101 Any partially screened views of the Proposed Development would be seen in the context of the park. The Proposed Development would not have any additional impact on the character of the view, or on visual amenity, in the winter condition.
- 9.102 The primacy of the World Heritage Site buildings and the pastoral character of the Victoria Tower Gardens would be preserved.
- 9.103 The effect would be **Negligible**. The effect would be direct, local and permanent.



**CUMULATIVE: SUMMER**

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



**CUMULATIVE: WINTER**

- 9.105 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.
- 9.106 Therefore, in the cumulative condition, the would remain **Negligible**.



**VIEW 8: LVMF 19A.1: LAMBETH BRIDGE DOWNSTREAM, NIGHT TIME, SUMMER****EXISTING: SUMMER, DAYTIME**

9.107 The view is described in the LVMF thus:

*“The river dominates the foreground and middle ground of the view, with the Palace of Westminster forming the focus. Other important elements in the view are the mature trees on both sides of the river. The intensity of riverside buildings north of Westminster Bridge and east into the City of London, is secondary in this view to the visually ‘semi-pastoral’ setting of the World Heritage Site. No development crowds in close to the World Heritage Site, with only the towers of Westminster Abbey interacting with it to the left of the view (the roof of the Abbey also being visible through the trees in winter). A group of prominent, similarly sized buildings on the riverfront, which includes Whitehall Court, Embankment Place, Adelphi House and Shell Mex House, can also be seen in this view. These are underscored by Westminster Bridge, while other prominent buildings – including the London Eye, the former County Hall, St Thomas’ Hospital are seen on the Lambeth Site of the river.*

*To the far north-east is the City of London, including Tower 42 and 30 St Mary Axe (‘the Gherkin’), making this a Viewing Location with some exceptionally deep views. Centre Point and the BT Tower become visible in the backdrop of the Palace of Westminster from certain angles across the bridge.”*

9.108 The value attached to the view is Exceptional.

9.109 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 Medium susceptibility to change and Moderate sensitivity.

9.110 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.



**EXISTING: WINTER, DAYTIME**

- 9.111 In winter, the character of the view remains the same, with the buildings of the Westminster World Heritage Site being paramount in the centre of the view, and the Victoria Tower Gardens in the middle ground forming its 'semi-pastoral' setting.
- 9.112 Gaps in the tree cover allow some views into the space of the Victoria Tower Gardens, and the Buxton Memorial is partially visible in the middle of the park.



**EXISTING: SUMMER, NIGHT TIME**

- 9.113 At night, the illuminated Victoria Tower and Houses of Parliament in the centre of the view draw the viewer's eye, set against the dark relief of the Victoria Tower Gardens, through which some of the lights of Millbank are partially visible.
- 9.114 The London Eye, and lights from buildings along the Thames are noticeable from this viewpoint, and form part of the city centre experience.



**EXISTING: WINTER, NIGHT TIME**

- 9.115 The character of the night time scene remains the same in winter. There is some greater visibility through the tree line in Victoria Tower Gardens towards Millbank, but this does not change contribution made by the comparatively dark space within the park to the setting of the illuminated buildings of the World Heritage Site.



**PROPOSED: SUMMER, DAYTIME**

- 9.116 The Proposed Development would be partially visible through gaps in the tree line, at the lower levels within the park.
- 9.117 The open character of the space near the Victoria Tower would be preserved.
- 9.118 The lower parts of the bronze fins would be visible in the middle of the park, and the material palette would help the building to integrate well into its parkland setting. Similarly, whilst the entrance pavilion building and enhanced children's play area would be partially visible, these would not be obtrusive elements in the view, and would have no effect on visual amenity, or the ability to appreciate the important elements in the view.
- 9.119 The Proposed Development would not crowd the setting of the World Heritage Site, which would retain its primacy in the view. The contrast between the intensity of riverside buildings to the north of Westminster Bridge and the semi-pastoral setting of the World Heritage Site would be preserved.
- 9.120 The magnitude of impact would be Negligible.
- 9.121 The Proposed Development would give rise to a **Negligible** effect on visual receptors. The effect would be direct, local and permanent.



**PROPOSED: WINTER, DAYTIME**

- 9.122 In the winter condition, the tree cover is less dense, and allows views into the space within the Victoria Tower Gardens. At its northern end, the space closest to the Victoria Tower Gardens remains open, and the contrast between the semi-pastoral setting of the World Heritage Site to the south, and the more intense riverside development to the north Westminster Bridge is preserved.
- 9.123 The scale of the Proposed Development remains well below the tree line, and the character of this part of the view would not change.
- 9.124 Therefore, there is no additional impact in the winter condition.
- 9.125 The effect would be **Negligible**. The effect would be direct, local and permanent.



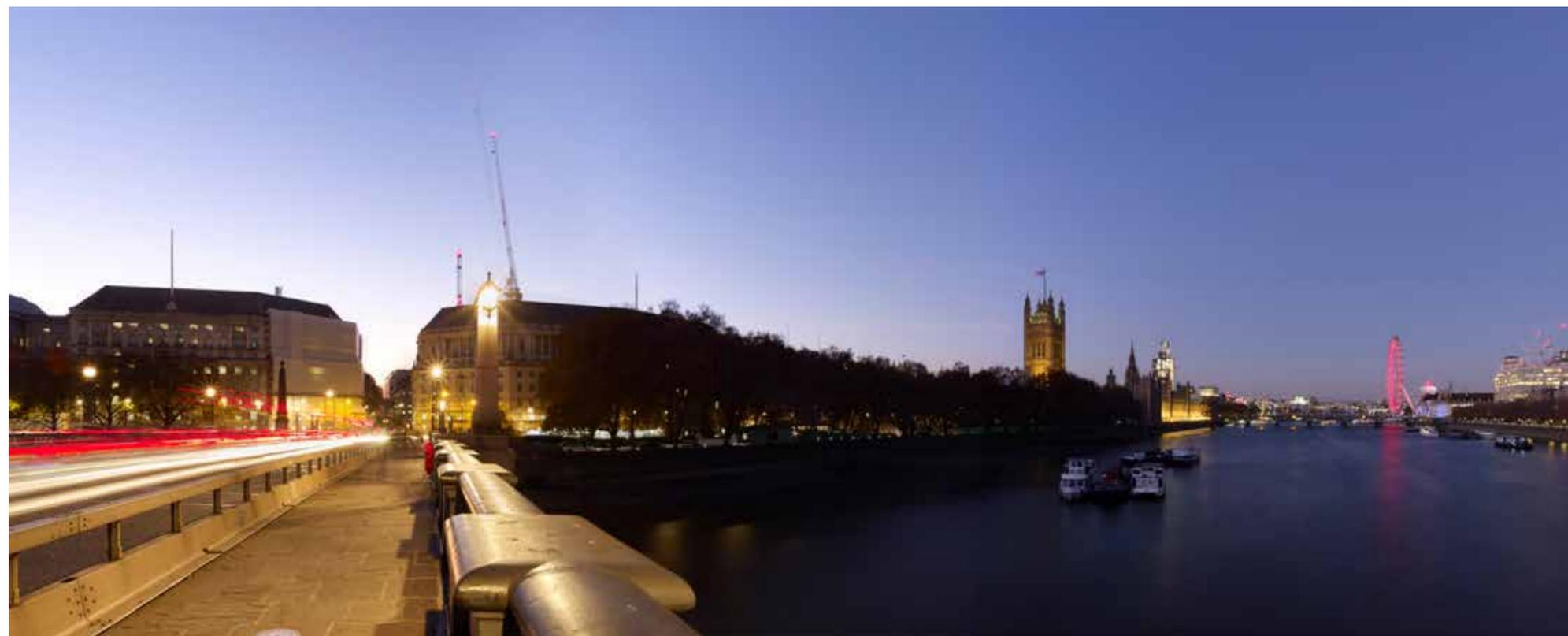
**PROPOSED: SUMMER, NIGHT TIME**

- 9.126 In the night time condition, the viewer's focus would remain on the heavily illuminated Houses of Parliament and London Eye.
- 9.127 Any light from the Proposed Development would be experienced in the context of the existing, filtered light from buildings along Millbank, and would have no effect on the experience of the view.
- 9.128 Therefore, we find no additional impact in the night time condition.
- 9.129 The effect would be **Negligible**. The effect would be direct, local and permanent.



**PROPOSED: WINTER, NIGHT TIME**

- 9.130 In the winter night time condition, the illuminated fins of the Proposed Development and the walkway lighting would be visible within the park space.
- 9.131 Whilst perceptible, this would not change the viewer's overall experience of the view, and the viewer's focus would remain on the heavily illuminated Houses of Parliament and London Eye. The Proposed Development would be seen in the context of the existing light filtered through from buildings along Millbank, and would not change the character of the view.
- 9.132 The effect would be **Negligible**. The effect would be direct, local and permanent.



**CUMULATIVE SUMMER, DAYTIME**

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



**CUMULATIVE: WINTER, DAYTIME**

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



**CUMULATIVE: SUMMER, NIGHT TIME**

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



**CUMULATIVE: WINTER, NIGHT TIME**

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



## VIEW 9: TC4

## EXISTING

- 9.134 This viewpoint is situated at the top of the steps to Lambeth Bridge, the southernmost extent of the Victoria Tower Gardens, oriented north towards the Palace of Westminster. This is a transient view, which would be experienced by visitors entering the park as they descend the steps from Lambeth Bridge.
- 9.135 The view has an urban parkland character, focussed on the linear space of the Victoria Tower Gardens. The foreground comprises the children's play area, comprised of play equipment arranged in an area of hardstanding, which gives way to a defined lawn in the middle ground. Built form within the park comprises the refreshment hut visible close to the Millbank entrance to the park.
- 9.136 The dense belts of plane trees flanking the central space define the extent of the park, and the viewer would be aware of their proximity to the Palace of Westminster, though this is not a planned view towards the World Heritage Site, and the buildings are largely occluded by the dense tree cover in summer conditions.
- 9.137 The left hand side of the view is framed by the line of built form along Millbank. This road, along with Lambeth Bridge to the viewer's rear, is heavily trafficked, with associated road noise contributing to the city centre sense of the Site.
- 9.138 The value attached to the view is Medium.
- 9.139 The view would primarily be experienced by pedestrians entering the park. Their focus would be on wayfinding, and on views through the park. These visual receptors have a Medium susceptibility to change and Moderate sensitivity.



**PROPOSED**

- 9.140 The Proposed Development would update the play area in the foreground, with new play equipment and hard and soft landscaping.
- 9.141 The new café kiosk would be a noticeable feature the left hand side. Its treatment responds to the character and appearance of the stonework along the steps and embankment, and is designed to be minimally intrusive, though the proximity to the exit creates a sense of encroachment.
- 9.142 The new landscaping would improve the walkway along the eastern side of the park with areas of planting around the base of trees. Views towards the World Heritage Site would remain seasonally screened by the dense tree cover.
- 9.143 The entrance pavilion to the memorial would be a prominent feature in the middle of the view, seen in the context of the existing refreshment hut to the left hand side. The scale of development would remain significantly lower than that of the branch line of the trees, and of the surrounding buildings outside the park.
- 9.144 The bronze fins of the memorial rise behind the entrance pavilion, and partially screen the World Heritage Site buildings, though, as discussed, this is not a viewpoint from which their heritage value would be appreciated.
- 9.145 The open character of the middle ground of the view would be changed to that of the memorial, which would be read by the viewer as a contained unit within the park.
- 9.146 The magnitude of impact would be Low.
- 9.147 The Proposed Development would give rise to a **Minor Adverse** effect to visual receptors. The effect would be direct, local and permanent.



**CUMULATIVE**

9.148 None of the cumulative schemes would be visible in conjunction with the Proposed Development. In the cumulative condition, the effect would remain **Minor Adverse**.





## VIEW 10: M15

## EXISTING

- 9.149 This viewpoint is situated to the south of the Application Site, oriented north across the roundabout between Millbank, Horseferry Road and Lambeth Bridge.
- 9.150 The fore and middle ground of the view comprise the open space of the road and roundabout, which forms a focal point in the centre of the view. The interchange is heavily trafficked, and the viewer would be aware of the associated noise and traffic presence.
- 9.151 Thames House (grade II) is a dominant presence to the left hand side, which is the largest structure in the view. The dense vegetation at the roundabout, and within Victoria Tower Gardens beyond, provides relief from the urban environment, and screens views towards the background of the view.
- 9.152 Whilst not within the frame, the viewer would be aware of the open space of the Thames to their right, traversed by the linear route of Lambeth Bridge (grade II), one of the obelisks of which is a prominent feature in the middle ground.
- 9.153 An uppermost corner of the Victoria Tower is partially visible in the background of the view, behind the trees.
- 9.154 The value attached to the view is Low.
- 9.155 The view would primarily be experienced by a number of pedestrians traveling along Millbank. Their focus would be on wayfinding and the route ahead. These visual receptors have a Low susceptibility to change and Moderate sensitivity.
- 9.156 In addition, the view would be experienced by a number of road users. Their focus would be on the junction and road ahead. These visual receptors have a Low susceptibility to change and Low sensitivity.



**PROPOSED**

- 9.157 There would be some partial views of the Proposed Development, seen in the context of the dense vegetation within the Victoria Tower Gardens.
- 9.158 The entrance pavilion and fins of the memorial would be partially visible below the branch line of the trees, in the background of the view, obscured by the roundabout to the centre.
- 9.159 Whilst the monument would be perceptible from this perspective, it would not change the character of the view, and would form a minor aspect of the background. The viewer's attention would remain on the heavily trafficked junction, and on wayfinding through the area, and visual amenity would not change.
- 9.160 The magnitude of impact would be Negligible.
- 9.161 The Proposed Development would give rise to a **Negligible** effect to visual receptors. The effect would be direct, local and permanent.



**CUMULATIVE**

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

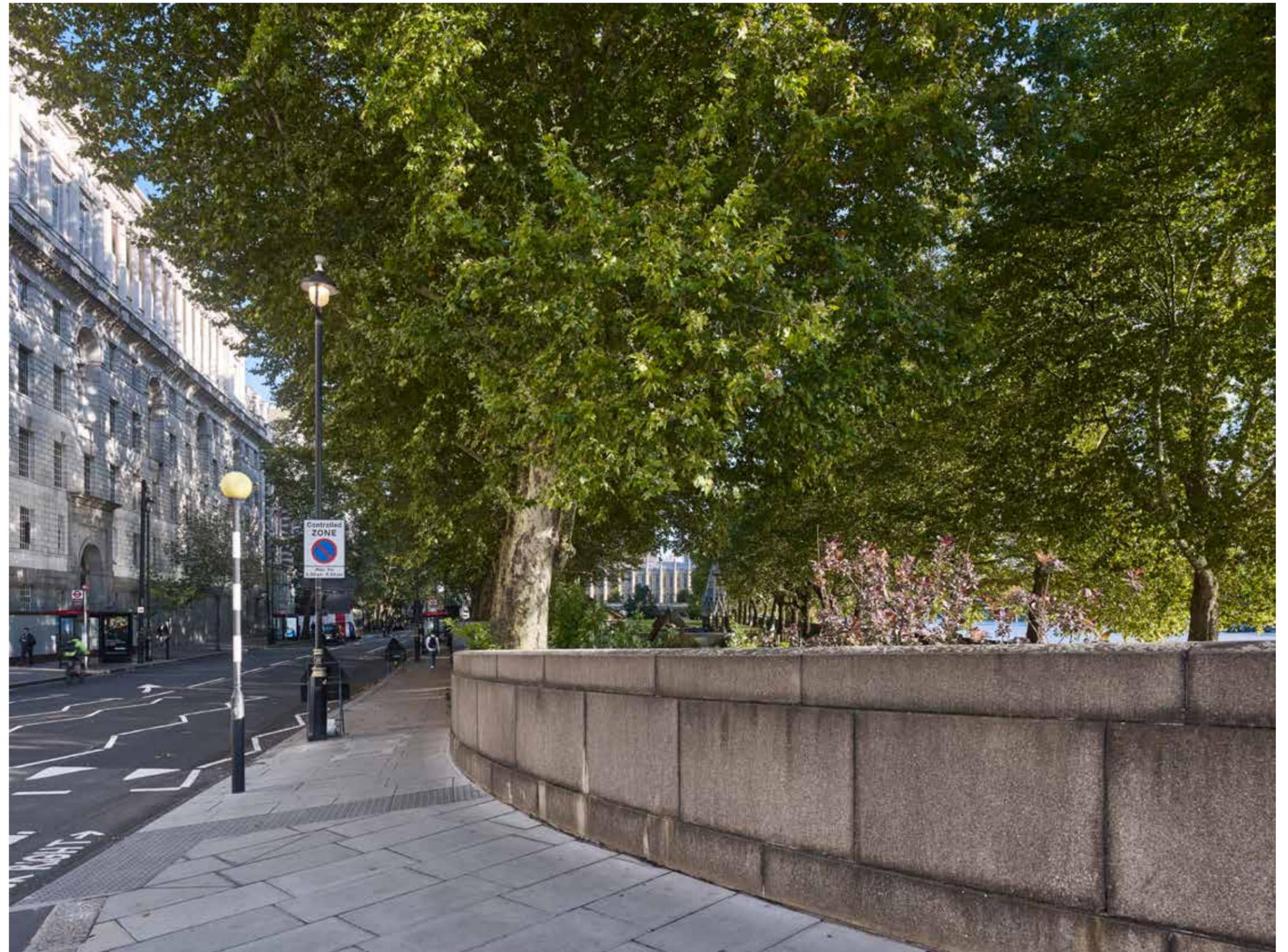




## VIEW 11: MILLBANK TOWARDS NORTH

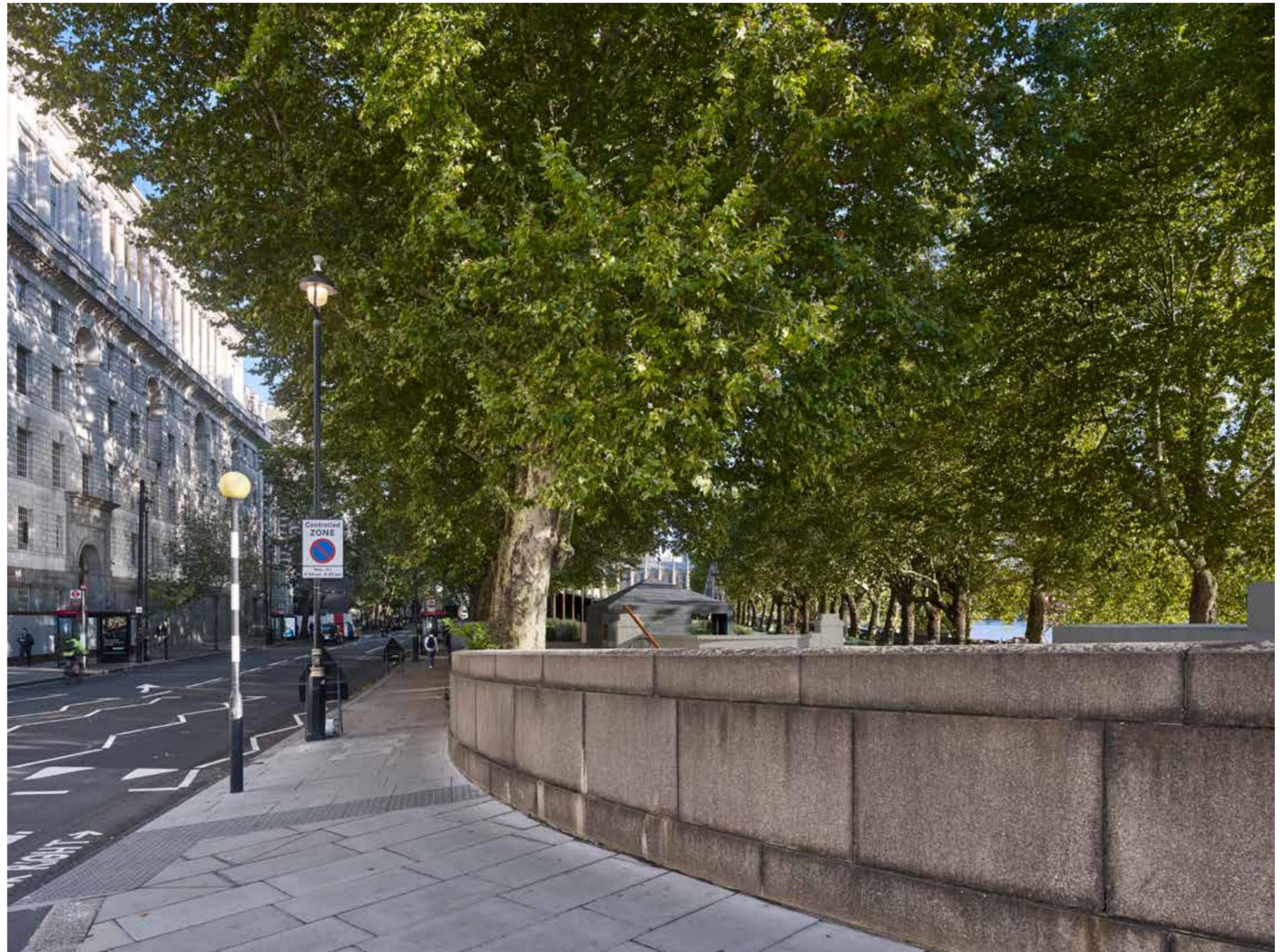
## EXISTING

- 9.163 This viewpoint is situated to the south east of the Application Site, on the footpath on the Victoria Tower Gardens side of Millbank, oriented north. This is a transient view, which would be experienced by pedestrians traveling along the pavement along Lambeth Bridge and Millbank.
- 9.164 The view has a linear character, derived from the parallel spaces of Millbank, which extends into the background on the right hand side of the view, and the open space within Victoria Tower Gardens to the left. The two are separated by the boundary wall of the park.
- 9.165 The viewer's eye is drawn along the linear route of the footpath, which curves around the park and extends into the background. The road is an important arterial route along the north bank of the river, and the viewer would be aware of heavy traffic moving along Millbank and across Lambeth Bridge to the rear.
- 9.166 Within the park, the view is terminated by the gothic south elevation of the Victoria Tower (grade I), marking the location of the Westminster World Heritage Site. The Buxton Memorial (grade II\*) is a visible feature in the middle of the view, seen partially against the backdrop of the Palace of Westminster. Whilst the WHS is partially visible in this view, it is not a viewpoint from which a visitor would pause to appreciate its value.
- 9.167 The value attached to the view is Medium.
- 9.168 The view would primarily be experienced by a number of pedestrians traveling along Millbank. Their focus would be on wayfinding and the route ahead. These visual receptors have a Low susceptibility to change and Moderate sensitivity.
- 9.169 In addition, the view would be experienced by a number of road users. Their focus would be on the junction and road ahead. These visual receptors have a Low susceptibility to change and Low sensitivity.



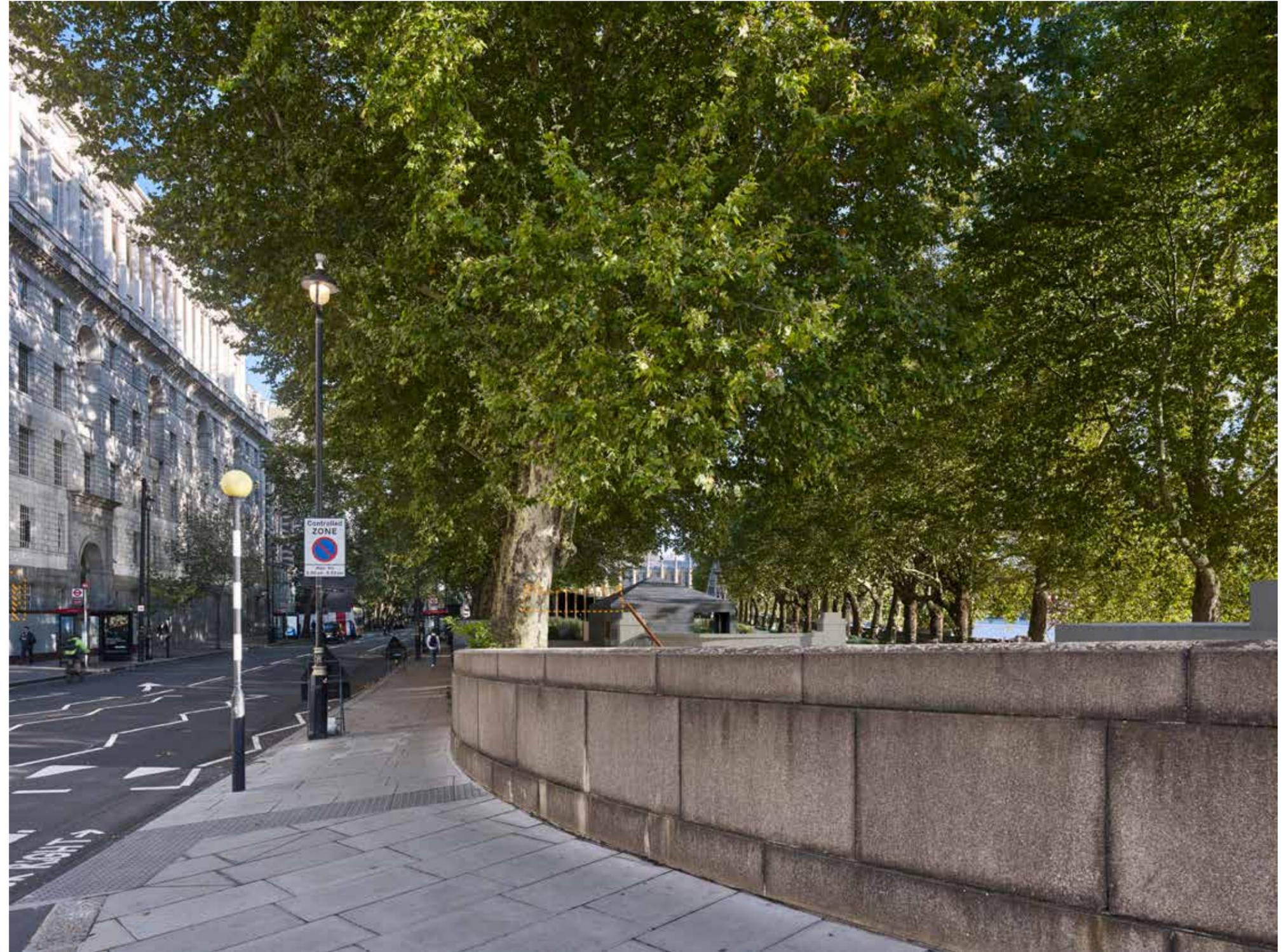
**PROPOSED**

- 9.170 The Proposed Development would change the character of the middle ground from open space to a defined memorial. The viewer would be aware of the entrance pavilion to the memorial, which would partially screen views towards the Buxton Memorial, though its scale would remain lower. Its muted materials reduces the building's prominence. Whilst not within the frame, the viewer would also be aware of the café kiosk to the right hand side.
- 9.171 The partial views towards the Houses of Parliament would be preserved through the fins of the memorial, which are minimally intrusive by virtue of their form and orientation, which responds to the rhythm of the existing buttresses on the south wall of the building.
- 9.172 The viewer's attention would remain drawn along the linear route of the footpath which would remain the focus, and the urban context along this part of Millbank would not change.
- 9.173 The magnitude of impact would be Low.
- 9.174 The Proposed Development would give rise to a **Minor Adverse** effect to visual receptors. The effect would be direct, local and permanent.



**CUMULATIVE**

9.175 None of the cumulative schemes would be visible in conjunction with the Proposed Development. In the cumulative condition, the effect would remain **Minor Adverse**.





## VIEW 12: HORSEFERRY ROAD

## EXISTING

- 9.176 This viewpoint is situated on the west side of Millbank, close to the junction with Horseferry Road. It is oriented north east towards Victoria Tower Gardens and the river. This is a transient view, which would be experienced by the viewer as they move through the area.
- 9.177 The foreground takes in an oblique view of the carriageway along Millbank, a busy thoroughfare with heavy traffic.
- 9.178 The park beyond is read by the viewer as a separate space, bounded by the iron railings and dense hedge. The trees punctuate the view at regular intervals, and almost entirely obscure views towards the Houses of Parliament from this viewpoint, though the viewer would be aware of their proximity.
- 9.179 The Buxton Memorial is a prominent feature in the centre of the view, by virtue of its light-coloured materials and position between the trees, though this is not a position from which its heritage value can be best appreciated. Other structures in the park are also visible, including a single storey refreshment hut, and equipment for the play area.
- 9.180 The value attached to the view is Low.
- 9.181 The view would primarily be experienced by a number of pedestrians. Their focus would be on wayfinding and the busy carriageway along Millbank. These visual receptors have a Medium susceptibility to change and Moderate sensitivity.



## PROPOSED

- 9.182 The entrance pavilion is a noticeable feature which would introduce a new element to the centre of the view. This would partially obscure the Buxton Memorial, though as noted, this is an incidental view.
- 9.183 The fins of the memorial itself would be visible through the trees in the background of the view, and views of the space between would contribute to the viewer's understanding of the memorial's form. Their high quality design and elegant shape of the memorial would be an attractive addition to the middle of the view.
- 9.184 The foreground of the view, and heavily trafficked carriageway along Millbank, would not change, and the sense of differentiation between the road and the space within the park, reinforced by the boundary treatment, would be preserved.
- 9.185 The magnitude of impact would be Low.
- 9.186 The Proposed Development would give rise to a **Minor Adverse** effect to visual receptors. The effect would be direct, local and permanent.



**CUMULATIVE**

9.187 None of the cumulative schemes would be visible in conjunction with the Proposed Development. In the cumulative condition, the effect would remain **Minor Adverse**.





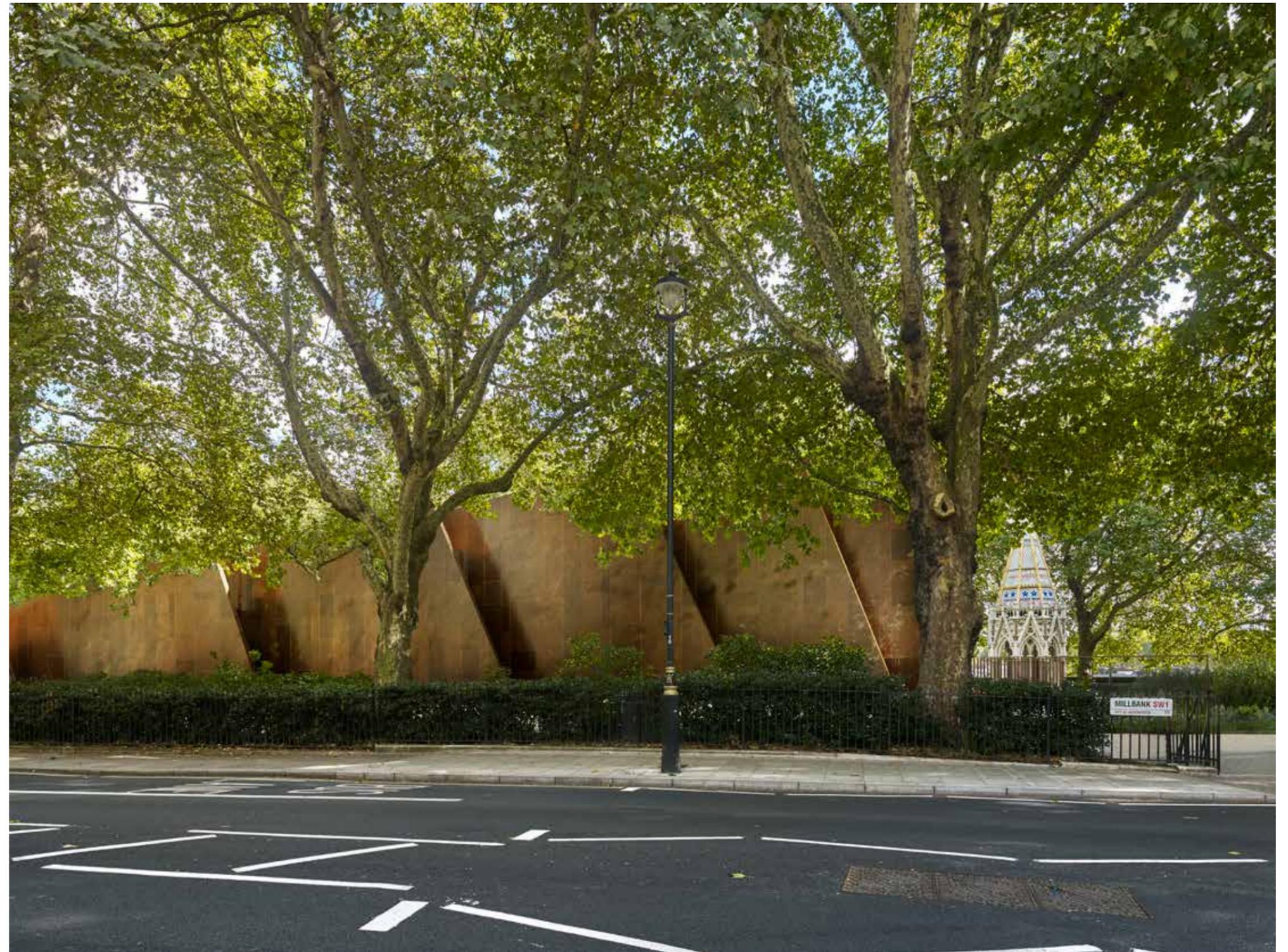
**VIEW 13: DEAN STANLEY STREET****EXISTING**

- 9.188 The view is situated on the west side of Millbank, at the junction with Dean Stanley Street, oriented north east towards the Application Site. This is a transient view, which would be experienced by the viewer as they move through the area.
- 9.189 The road is a busy thoroughfare, with heavy traffic passing laterally across the viewer's field of vision. The park is defined by the railings and dense hedge boundary, and the mature London Plane trees within contribute to the contrast between the open space of the park and the surrounding urban environment.
- 9.190 The Buxton Memorial is a prominent feature in the right hand side of the view, and its polychromatic roof form draws the viewer's eye.
- 9.191 The open space of the river in the background of the view gives a sense of depth, and there are some views through the tree line towards built development on the opposing bank.
- 9.192 Whilst not visible within this frame, the viewer would be aware of the prominent buildings of the Westminster World Heritage Site to their left hand side.
- 9.193 The value attached to the view is Medium.
- 9.194 The view would primarily be experienced by a number of pedestrians. Their focus would be on wayfinding and the busy carriageway along Millbank. These visual receptors have a Medium susceptibility to change and Moderate sensitivity.
- 9.195 In addition, the view would be experienced by a small number of road users at the junction between Dean Stanley Street and Millbank. Their focus would be on the traffic and road ahead. These visual receptors have a Low susceptibility to change and Low sensitivity.



**PROPOSED**

- 9.196 From this location, the viewer would take in an oblique view of the Proposed Development, comprised of the series of fins, which increase in scale towards the left hand side of the view.
- 9.197 This viewpoint has been selected to show the maximal impact of the Proposed Development. From this position, views towards the river would be terminated in the centre of the view, and the character of the view would change from one of open parkland, to one focussed on the built form of the memorial.
- 9.198 The layered fins of the monument break up the composition and provide a high quality, interesting elevation. The bronze treatment complements the natural colour palette within the park, and is muted in comparison with the polychromatic Buxton Memorial.
- 9.199 At operational stage, the viewer would be aware of visitors passing through the fins, and entering the below-ground learning centre, which would reinforce the sense of depth between each fin.
- 9.200 The mature trees would continue to provide relief from the urban environment in the foreground.
- 9.201 The magnitude of impact would be Medium.
- 9.202 The Proposed Development would give rise to a **Moderate Adverse** effect to visual receptors. The effect would be direct, local and permanent.



**CUMULATIVE**

9.203 None of the cumulative schemes would be visible in conjunction with the Proposed Development. In the cumulative condition, the effect would remain **Moderate Adverse**.





**VIEW 14: GREAT PETER STREET****EXISTING**

- 9.204 This viewpoint is situated to the north west of the Application Site, oriented south east across Millbank towards Victoria Tower Gardens. This is a transient view, which would be experienced by the viewer as they move through the area.
- 9.205 The foreground of the view has an open character, comprised of the linear route of the road. The viewer's eye is drawn to the right hand side in the background, towards the roundabout junction with Lambeth Bridge. The viewer would also be aware of heavy traffic passing along the road.
- 9.206 The space within the park is defined by the dense hedgerow which lines the boundary, punctuated at intervals by mature London Plane and some smaller trees. There are some, partial views of the Buxton Memorial, though these are not a prominent part of the experience of the view.
- 9.207 The open space of the river beyond creates a sense of depth in the view, and built form on the opposing bank is partially visible through the tree cover.
- 9.208 Whilst not within the frame, the viewer would be aware of the Westminster World Heritage Site buildings to their left.
- 9.209 The value attached to the view is Medium.
- 9.210 The view would primarily be experienced by a number of pedestrians. Their focus would be on wayfinding and the busy carriageway along Millbank. These visual receptors have a Medium susceptibility to change and Moderate sensitivity.
- 9.211 In addition, the view would be experienced by a small number of road users at the junction between Dean Stanley Street and Millbank. Their focus would be on the traffic and road ahead. These visual receptors have a Low susceptibility to change and Low sensitivity.



## PROPOSED

- 9.212 The viewer raised ground of the monument, and the bronze slopes, would add interest in the middle ground of the view. The bronze fins define the extent of the memorial, and contribute to the sense of distinction between the spaces within and outside the park.
- 9.213 The Buxton Memorial would be partially screened by the Proposed Development, though, as discussed, this was not a prominent part of the experience or a view from which its heritage value is best appreciated.
- 9.214 The character of the foreground, and of the space outside the park, would not change as a result of the Proposed Development.
- 9.215 The magnitude of impact would be Medium.
- 9.216 The Proposed Development would give rise to a **Moderate Beneficial** effect to visual receptors. The effect would be direct, local and permanent.



**CUMULATIVE**

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





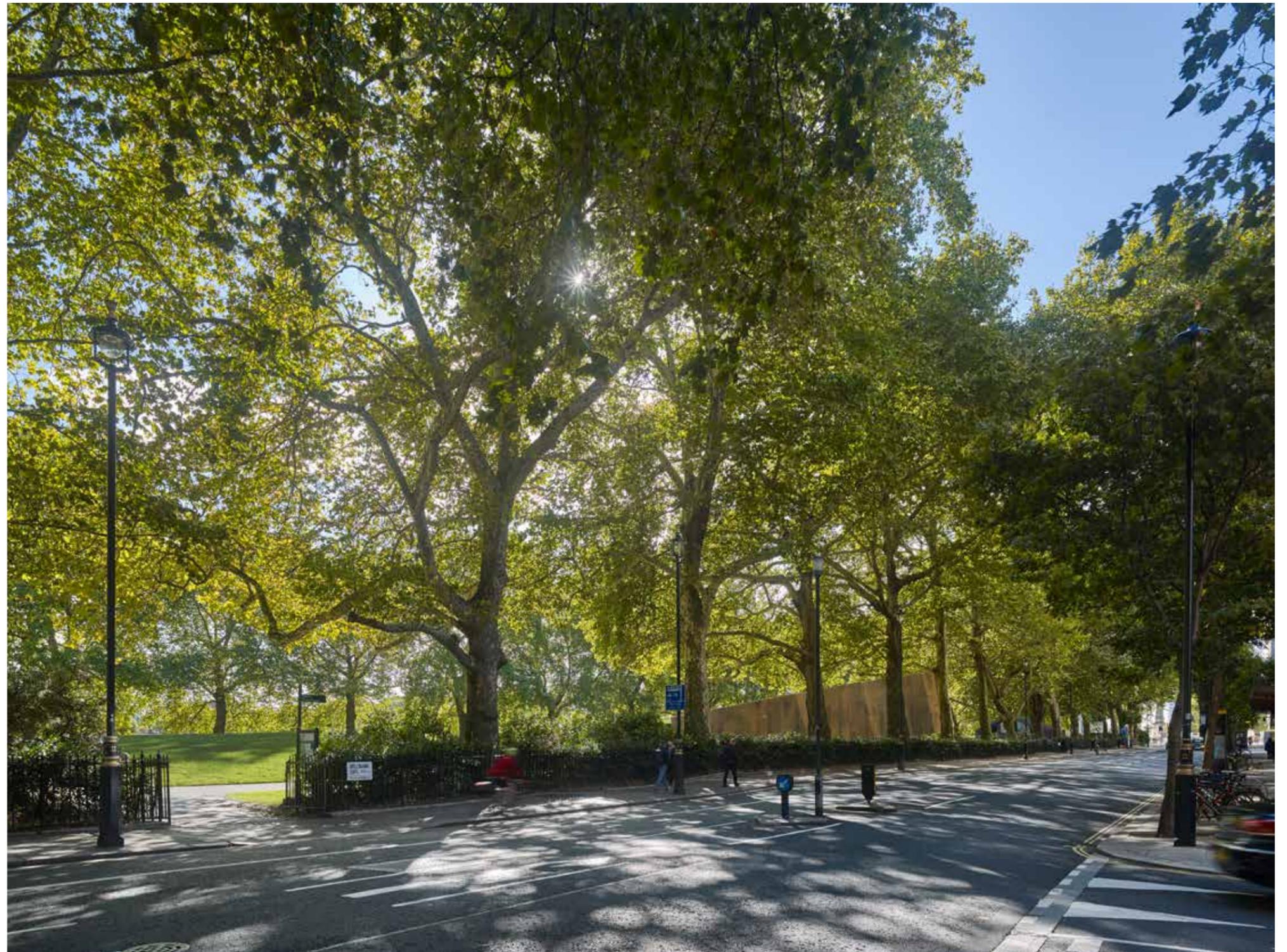
**VIEW 15: GREAT COLLEGE STREET****EXISTING**

- 9.218 This viewpoint is situated along Millbank close to the entrance to the Victoria Tower Gardens, at the junction with Great College Street. This is a transient view, which would be experienced by the viewer as they move through the area.
- 9.219 The foreground of the view has an open character, comprised of the linear route of the road. The viewer's eye is drawn towards the right hand side of the view, where the road progresses into the background. The viewer would also be aware of heavy traffic moving along Millbank.
- 9.220 The space within the park is defined by the dense hedgerow which lines the boundary, punctuated at intervals by mature plane and smaller trees. The entrance gates provide a view into the park, and to the river beyond.
- 9.221 The Buxton Memorial is a noticeable feature in the centre of the view, by virtue of its scale and materials.
- 9.222 The open space of the river beyond creates a sense of depth in the view, and built form on the opposing bank is partially visible through the tree cover.
- 9.223 Whilst not within the frame, the viewer would be aware of the Westminster World Heritage Site buildings to their left.
- 9.224 The value attached to the view is Medium.
- 9.225 The view would primarily be experienced by a number of pedestrians. Their focus would be on wayfinding and the busy road. These visual receptors have a Medium susceptibility to change and Moderate sensitivity.
- 9.226 In addition, the view would be experienced by a smaller number of road users. Their focus would be on navigating the junction with Millbank, and on the road ahead. These visual receptors have a Low susceptibility to change and Low sensitivity.



**PROPOSED**

- 9.227 The Proposed Development would introduce a new element to the centre of the view.
- 9.228 Its elegant form and attractive materials would make a positive contribution to visual amenity, and contribute to a sense of destination within the park. The gentle gradient reduces the sense of scale, and integrates with the trees in an attractive way.
- 9.229 Views towards the Buxton Memorial would be obscured by the Proposed Development. The mature trees would be retained, and would continue to define the park boundary.
- 9.230 The character of the foreground, and of the space outside the park, would not change as a result of the Proposed Development. Views through the park gate would be preserved.
- 9.231 The magnitude of impact would be Medium.
- 9.232 The Proposed Development would give rise to a **Minor Beneficial** effect to visual receptors. The effect would be direct, local and permanent.



**CUMULATIVE**

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





## VIEW 16: TC6A

## EXISTING

- 9.234 This viewpoint is situated within the Victoria Tower Gardens, oriented south towards the Application Site.
- 9.235 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.
- 9.236 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.
- 9.237 The Buxton Memorial is a prominent feature which draws the viewer's eye in the middle ground.
- 9.238 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.
- 9.239 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.
- 9.240 The value attached to the view is Medium.
- 9.241 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.
- 9.242 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**

- 9.243 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.
- 9.244 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.
- 9.245 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.
- 9.246 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.
- 9.247 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.
- 9.248 The magnitude of impact would be Medium.
- 9.249 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**

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





## VIEW 17: TC3B

## EXISTING

- 9.251 This viewpoint is situated on the east side of the Victoria Tower Gardens, oriented south west towards the Application Site.
- 9.252 The fore and middle ground of the view are defined by the open space within the park, comprising a wide expanse of lawn bounded by mature plane trees. The lower parts of the Buxton Memorial are partially visible in the left hand side of the view, though this is incidental and does not form the main focus.
- 9.253 The background of the view comprises the continuous line of development along Millbank, the upper parts of which are partially obscured by the dense tree cover.
- 9.254 The value attached to the view is Medium.
- 9.255 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.
- 9.256 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**

- 9.257 The Proposed Development would introduce a new element in the middle ground of the view, with the raised area above the entrance creating a gentle slope defined by the bronze fins which protrude above its crest.
- 9.258 The new hard and soft landscaping would improve the appearance of the pathways, and the immediate environs of the trees in the foreground. The path intersecting the park would contribute to a more varied, less formal arrangement.
- 9.259 The scale of the Proposed Development would remain significantly lower than that of the development outside the park, and of the surrounding tree line. The attractive, curved form is a romantic addition to the view, and the interplay with the bronze, sculptural fins would be an attractive, sculptural addition to the view.
- 9.260 The lower parts of the Buxton Memorial would remain visible, but as at present, these would not be the focus of the view.
- 9.261 The magnitude of impact would be Medium.
- 9.262 For the reasons considered above, the Proposed Development would give rise to a **Moderate Beneficial** effect to visual receptors. The effect would be direct, local and permanent.



**CUMULATIVE**

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





## VIEW 18: TC3A

## EXISTING: DAYTIME

- 9.264 The viewpoint is situated on the west side of the Victoria Tower Gardens, oriented south east, towards the Application Site and the Buxton Memorial.
- 9.265 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.
- 9.266 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.
- 9.267 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.
- 9.268 The value attached to the view is Medium.
- 9.269 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.
- 9.270 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**

- 9.271 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.
- 9.272 Traffic moving along the road would also become more prominent by virtue of its illumination.
- 9.273 We note that the park is closed for some night time hours, and thus appreciation of the view would be limited.



**PROPOSED: DAYTIME**

- 9.274 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.
- 9.275 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. The entrance pavilion and play area, whilst partially visible, would not feature prominently in the view.
- 9.276 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 transparent panels which create views into the courtyard of the Proposed Development, integrating the space within the monument with that of the park.
- 9.277 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.
- 9.278 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.
- 9.279 The magnitude of impact would be Medium.
- 9.280 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**

- 9.281 The illumination of the Proposed Development would create interest within the park at night time, creating a focus within the park.
- 9.282 The illuminated markers along the pathways would facilitate movement through the park during hours of darkness.
- 9.283 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.
- 9.284 The effect would remain **Moderate Beneficial**.



**CUMULATIVE: DAYTIME**

9.285 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**

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



**VIEW 19: VICTORIA TOWER GARDENS****EXISTING: DAYTIME**

- 9.287 This viewpoint is situated part way along the pedestrian path to the west side of Victoria Tower Gardens, close to a pedestrian entrance, oriented south.
- 9.288 The focus of the view comprises the open space of the park, traversed by pathways. The hard landscaping is irregular, and the paths have been heavily patched, resulting in an untidy, careworn appearance.
- 9.289 The middle ground of the view comprises a wide lawn, leading towards the play area and steps to Lambeth Bridge at the southernmost extent of the park. The obelisk at the junction with the bridge is just visible beyond the play area in the view, above the Spicer Memorial, frames the extent of the park.
- 9.290 The space within the park is framed by mature plane trees at regular intervals, and the view along the path is terminated by a refreshment hut.
- 9.291 The viewer would be aware of the busy vehicular route along Millbank to the right hand side of the frame.
- 9.292 The value attached to the view is Low.
- 9.293 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.
- 9.294 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.



**EXISTING: NIGHT TIME**

- 9.295 At night time, the park is not directly illuminated, though the right hand side of the view is partially lit through light pollution from Millbank, adjacent.
- 9.296 Lambeth Bridge, in the background of the view, is a more prominent feature due to its lighting, and draws the viewer's eye.
- 9.297 The value of the view remains the same.



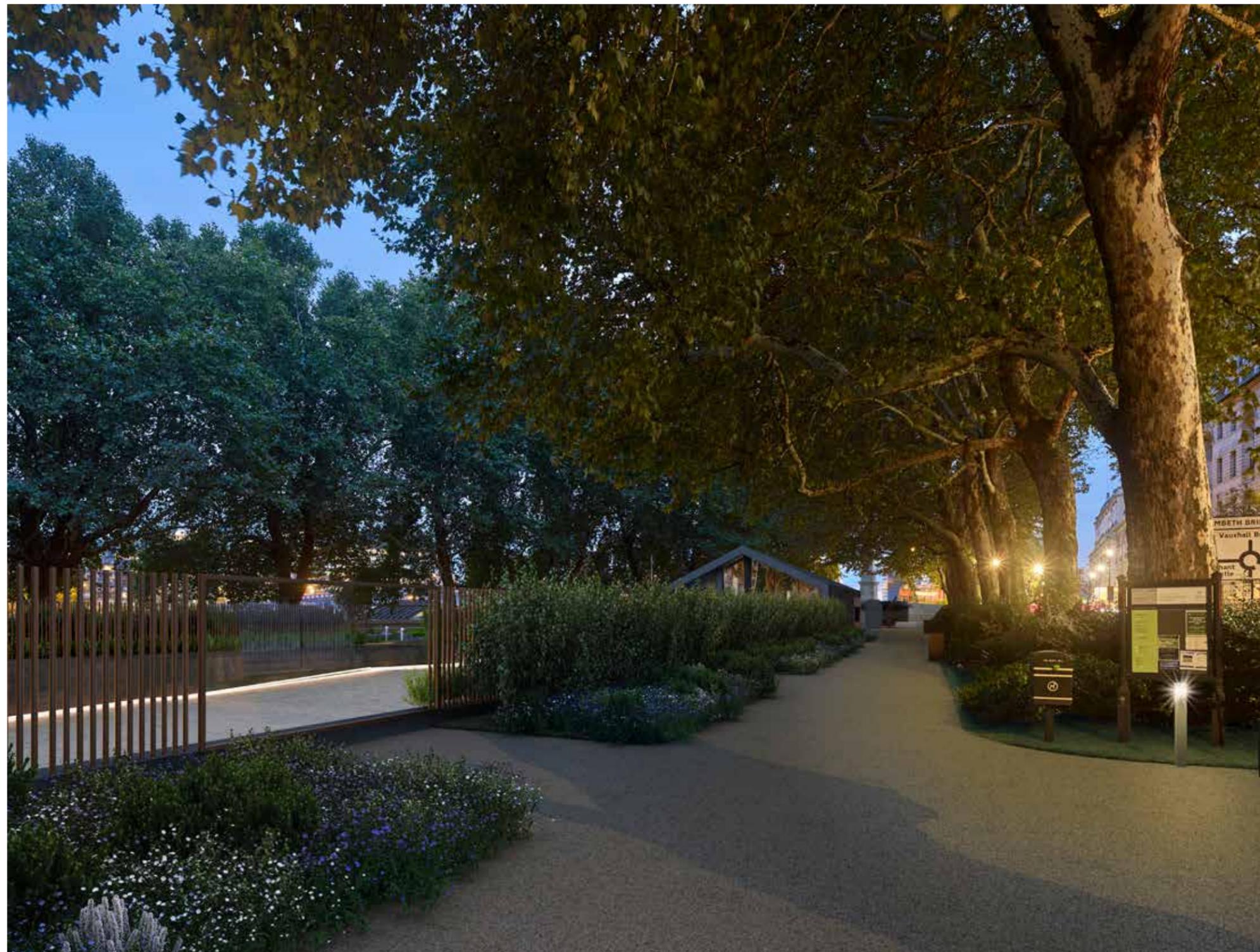
**PROPOSED: DAYTIME**

- 9.298 The foreground of the Proposed Development would comprise a comprehensive hard and soft landscaping scheme with attractive planting and an enhanced pedestrian walkway towards the southern end of the park. It would necessarily change the character of the view from open space to a planned monument.
- 9.299 The courtyard of the memorial has a sense of permeability, due to the transparent panels which allow views into and out of the space.
- 9.300 The entrance pavilion building is situated in the middle ground of the view, and appears subservient to the surrounding trees by virtue of its scale and materials. There is a sense of congestion in the background of the view, resulting from the form of the land.
- 9.301 The obelisk at Lambeth Bridge, and the Spicer Memorial, remain partially visible in the background of the view.
- 9.302 The magnitude of impact would be Medium.
- 9.303 The Proposed Development would give rise to a **Minor Adverse** effect to visual receptors. The effect would be direct, local and permanent.



**PROPOSED: NIGHT TIME**

- 9.304 Some lighting at walkway level provides illumination at the park entrance, which would assist with wayfinding.
- 9.305 This part of the memorial is not specifically illuminated. Lambeth Bridge remains a visible feature in the background of the view.
- 9.306 The effect of the Proposed Development would not materially change in the night time condition, and the effect would remain **Minor Adverse**.



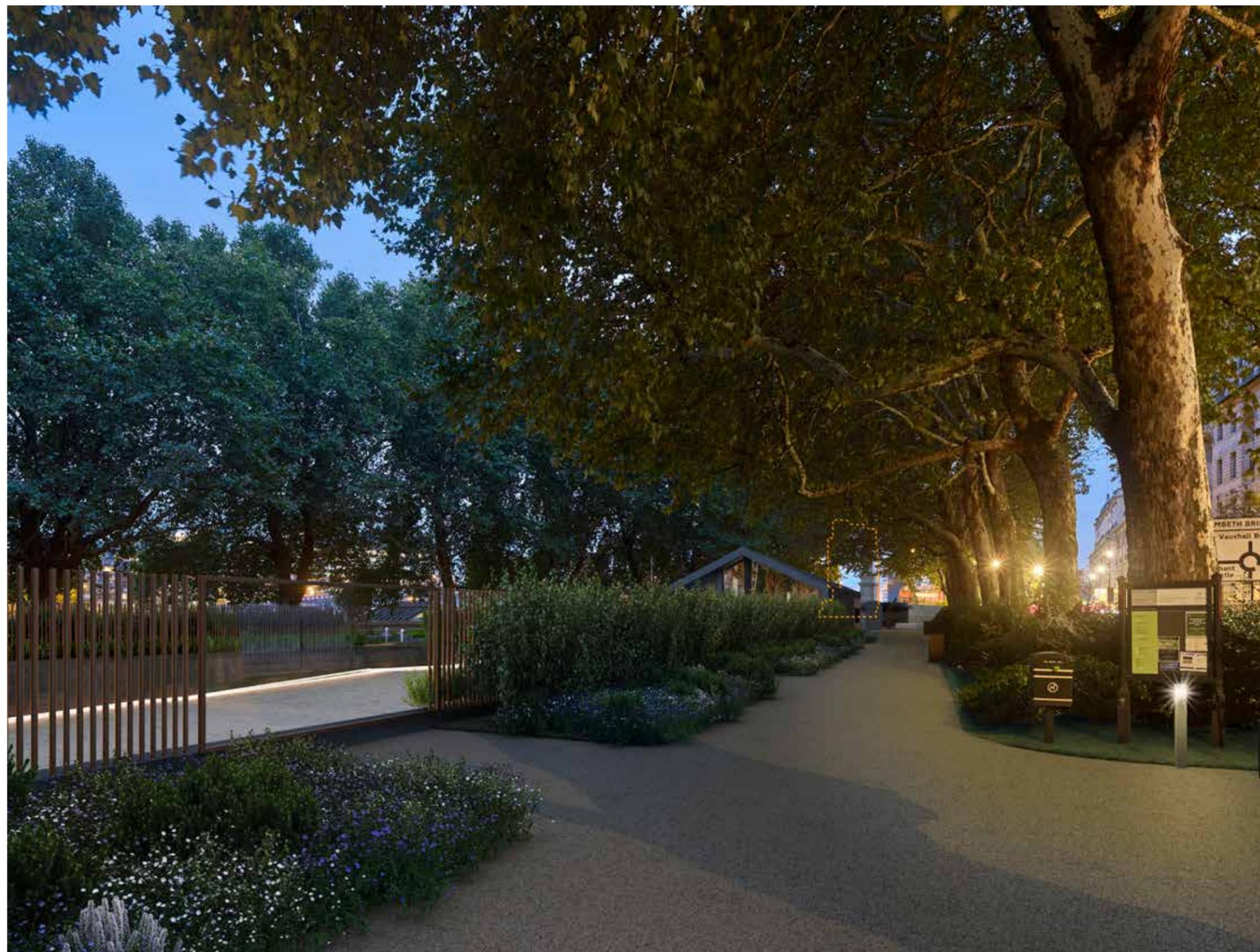
**CUMULATIVE: DAY TIME**

9.307 None of the cumulative schemes would be visible in conjunction with the Proposed Development. In the cumulative condition, the effect would remain **Minor Adverse**.



**CUMULATIVE: NIGHT TIME**

- 9.308 We note that whilst this is not illustrated in the visualisation, the recently consented Illuminated River would change the lighting of Lambeth Bridge (LPA Refs 18/01993/EIAFUL and 18/01994/LB). This would replace an existing lighting scheme, and would not form a prominent part of the view.
- 9.309 Therefore, the effect would remain **Minor Adverse**.



## VIEW 20: TC6D

## EXISTING

- 9.310 This viewpoint is situated part way along the pedestrian path to the west side of Victoria Tower Gardens, oriented south.
- 9.311 The fore and middle ground of the view comprise the open space of the park, consisting of a wide lawn to the viewer's left, and a linear footpath which draws the viewer's eye towards the background. The Buxton Memorial forms the focal point in the centre of the view, situated within the expanse of the park.
- 9.312 The space within the park is framed by mature plane trees at regular intervals, and distant views towards Lambeth Bridge create a sense of depth.
- 9.313 To the viewer's right hand side is the busy vehicular route along Millbank, lined with a range of office buildings.
- 9.314 The value attached to the view is Medium.
- 9.315 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.
- 9.316 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**

- 9.317 From this viewpoint, the viewer would have an oblique view of the fins of the memorial, which would introduce a new feature and interest in the middle ground of the view. The undulating topography to the viewer's left would screen views towards the river, which would be revealed from atop the new landscape form.
- 9.318 The new hard landscaping would create a wider and better quality pedestrian route towards the rear of the gardens which would draw the viewer's eye and invite movement, whilst the gentle undulation of the landscape integrates with the bronze fins of the structure to create a striking, sculptural feature and remains open and grassed.
- 9.319 The Buxton Memorial would be largely obscured from this perspective, though the viewer would be aware of its presence as the spire appears above the sculpted fins of the new memorial.
- 9.320 The magnitude of impact would be Medium.
- 9.321 The Proposed Development would give rise to a **Moderate Beneficial** effect to visual receptors. The effect would be direct, local and permanent.



**CUMULATIVE**

- 9.322 Whilst there is the potential for some, very limited views of cumulative development in the background of the view, this would not form part of the main experience of the view, and would occur in the context of existing built form, seen over a considerable distance, and read separately from the space within the park.
- 9.323 Therefore, the effect would remain **Moderate Beneficial**.

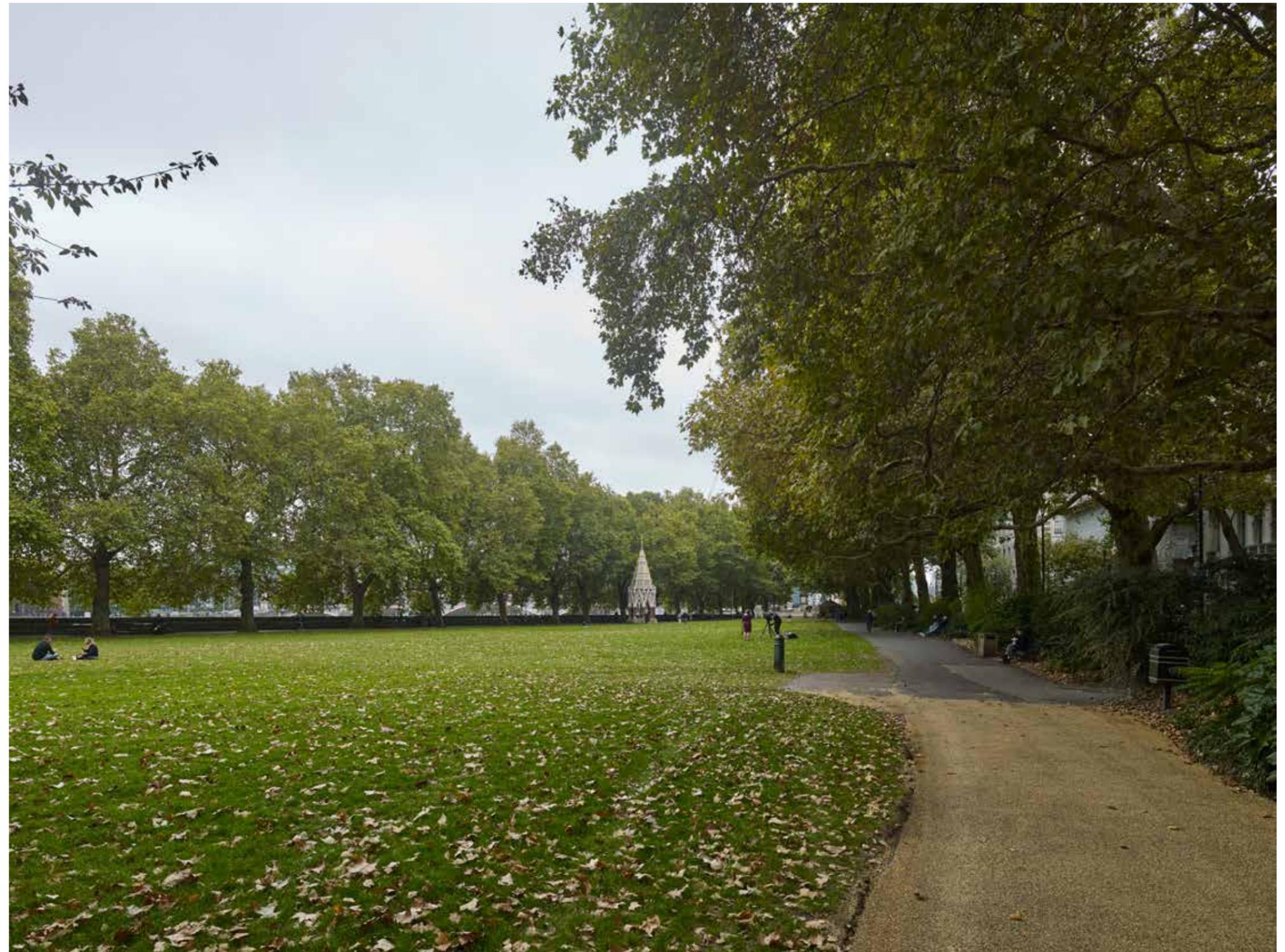




## VIEW 21: TC6C

## EXISTING

- 9.324 This viewpoint is situated on the pedestrian path to the west side of Victoria Tower Gardens, oriented south.
- 9.325 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 draws 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.
- 9.326 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.
- 9.327 The viewer would be aware of the busy vehicular route along Millbank to the right hand side of the frame.
- 9.328 The value attached to the view is Medium.
- 9.329 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.
- 9.330 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**

- 9.331 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.
- 9.332 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.
- 9.333 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.
- 9.334 The striking form of the monument befits its monumental purpose, and makes an attractive contribution to the view.
- 9.335 The magnitude of impact would be Medium.
- 9.336 The Proposed Development would give rise to a **Moderate Beneficial** effect to visual receptors. The effect would be direct, local and permanent.



**CUMULATIVE**

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





**VIEW 22: VICTORIA TOWER GARDENS****EXISTING: DAYTIME**

- 9.338 This viewpoint is situated within the open space of Victoria Tower Gardens, oriented north towards the Houses of Parliament and Westminster World Heritage Site.
- 9.339 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.
- 9.340 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.
- 9.341 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.
- 9.342 The value attached to the view is High.
- 9.343 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.
- 9.344 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**

- 9.345 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.
- 9.346 The Buxton Memorial is not illuminated, and is thus a less prominent feature than in the day time view.
- 9.347 The value of the view remains the same.
- 9.348 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**

- 9.349 The foreground of the view would take in the courtyard space at the entrance of the memorial and learning centre. The space is defined by the raised planting either side of the central courtyard space, which focusses the viewer's attention on 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.
- 9.350 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.
- 9.351 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.
- 9.352 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.
- 9.353 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. 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.
- 9.354 Due to the change in the view toward the World Heritage Site, the magnitude of effect would be High.
- 9.355 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**

- 9.356 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.
- 9.357 The illuminated Victoria Tower and the Elizabeth Tower in the background would remain a prominent feature behind the memorial.
- 9.358 The overall effect would thus remain **Moderate Beneficial**.



**CUMULATIVE: DAYTIME**

9.359 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**

9.360 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**.





// NATIONAL HOLOCAUST MEMORIAL



Cumulative Effects

## 11.0 CUMULATIVE EFFECTS

- 11.1 There are a number of committed developments in the vicinity of the application Site, which have been identified during the pre-application and EIA scoping stage. The assessment approach has entailed qualitative consideration of the effects of the Proposed Development in combination with these identified developments.
- 11.2 Section 17 of the ES details the Cumulative Effects and includes a table providing details of relevant committed developments (See Figure XX.X of **Section 17**).
- 11.3 These committed developments have been considered in relation to the Proposed Development to assess the cumulative impact in heritage, townscape and visual terms. Details of the consented schemes have been included in the visualisations where information on the schemes is available and descriptive text has been used where it is not practicable to include in the Proposed Developments in the visualisations.
- 11.4 It is considered that the construction of these developments would not result in any materially greater effects on the heritage, townscape or visual receptors assessed for the purposes of this development than those identified for the proposal itself. The developments are located such that their construction would not result in any materially greater effects on the settings of heritage, townscape or visual receptors assessed for the purposes of this development than those identified for the proposal itself (see Technical **Appendix 1.2** which includes wireframe AVRs of the cumulative proposals).

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Summary and Conclusions

## 12.0 SUMMARY AND CONCLUSIONS

- 12.1 This stand-alone Section of the Environmental Statement (ES) describes the direct and indirect effects of the proposals on cultural heritage assets, the townscape of the area and views of the Site, including strategic views as defined in the London View Management Framework.
- 12.2 The purpose of this summary is to identify the most significant effects, that is, the ones which bear most on the decision making process. The relevant sections of this Section of the ES should be consulted for the full range of effects.
- 12.3 Our assessment has been undertaken by qualified professionals (MRTPI/ IHBC) and informed by best practice guidance, including Historic England guidance on significance and setting, GLVIA 3, the Mayor's guidance on protecting the setting of World Heritage Sites, ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties and relevant Supplementary Planning Documents. In carrying out this appraisal we are mindful of the statutory considerations relating to the setting of listed buildings and development in a conservation area.
- The Proposed Development: UK Holocaust Memorial and Learning Centre**
- 12.4 The proposals for the UK National Holocaust Memorial and Learning Centre (UKHMLC) seek 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.
- 12.5 The design of the Proposed Development has evolved over two years, including a two stage international design competition that began on 14 September 2016. This included an extensive analysis of potential locations and consultation with Westminster City Council and other stakeholders.
- 12.6 The location is significant for two reasons. Firstly, it will provide the context for visitors' examination of the British Government's response to the Holocaust, which supports the function as a Learning Centre. Secondly, the distinctive form of the memorial will serve as a poignant reminder of the importance of democratic government, at the seat of one of the world's oldest Parliamentary Democracies, and thus facilitate an ongoing dialogue concerning the role of the state not just in 20th century history, but in the evolving modern world. Parliament is part of a system of government which enshrines the rule of law; the murder of European Jews stands outside this political framework.
- 12.7 The competition winning design has been developed with specialist heritage, townscape and visual advice and through extensive consultation with key stakeholders including Westminster City Council, the Greater London Authority (GLA) and Historic England.
- Policy and Approach**
- 12.8 This HTVIA ES Chapter is designed to meet the terms of regulations and so assist the local planning authority in the determination of this application. The HTVIA is also there to inform statutory consultees, amenity societies, local groups and individuals affected by the proposals or with some interest in them. We have sought to prepare a document which addresses these different audiences.
- 12.9 The process we have adopted in our volume follows technical and best practice guidance, as outlined in Section 2 and 3 of this document. We have also had regard to statutory considerations and the policies of the development plan, which require or imply a particular methodology.
- 12.10 It is common practice in major central London projects for these topics – heritage, townscape and visual – to be combined into a single assessment because they overlap to a significant degree (often around the idea of setting).
- 12.11 It is important, however, for the assessment to recognise that the individual topics are covered by distinct policies. 'Heritage' in particular is regulated through separate statutory provision, and in this application the relevant sections of the Planning (LBCA) Act 1990 are engaged, as detailed in Section 3.
- 12.12 The Courts have held that considerable importance and weight attaches to the statutory objective of avoiding harm to any conservation area or listed building, whether direct or indirect. The Courts have also confirmed that the totality of the statutory requirement is comprehended by the set of policies 193 through 196 of the Framework. The first contains what has been called the 'great weight provision' – namely great weight attaches to the object of conservation. This weight attaches both to works which may cause harm to a listed building, or its setting, and those which may be beneficial. Enhancing the significance of an asset or our ability to appreciate that and improvements to setting attract great weight in the planning decision making process under the terms of paragraph 193 of the NPPF.
- 12.13 The Framework policy on 'less than substantial harm' potentially applies in this case; however, the Courts have also held – see Section 3 of this Volume of the ES – that paragraph 196 of the NPPF is only engaged in the event that a proposal as a whole, comprising harmful and beneficial impacts, leads to net heritage harm. Thus, the decision as to whether or not a proposal harms heritage assets at all must be taken with reference to the totality of all effects which have been netted out.
- 12.14 The salient consideration as applicable to this Volume is whether the Proposed Development will preserve or enhance the character and appearance of the surrounding area, including the contribution made by the Site to designated heritage assets and their settings, the functioning and use of the space, and the visual amenity of those experiencing views of the Site. In approaching our assessment of these impacts, we note that the scale of the proposals and the surrounding urban environment mean that the UKHMLC would only be experienced within a relatively contained area. We have paid particular regard to the impact of the proposals on the ability to appreciate the Outstanding Universal Value of the Westminster World Heritage Site (WWHS). Victoria Tower Gardens, the site for the memorial, is not in the WHS; the land is an important element in its setting, supporting its OUV.

## Overview of Assessment: Heritage

### Victoria Tower Gardens

- 12.15 The intrinsic character of the Victoria Tower Gardens 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.
- 12.16 As discussed in detail at **Section 4.0**, 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.
- 12.17 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 Visitor Management Strategy 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.
- 12.18 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.
- 12.19 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.
- 12.20 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.
- 12.21 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 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.
- Westminster Abbey and Parliament Square Conservation Area**
- 12.22 The intrinsic character of the Westminster Abbey and Parliament Square Conservation Area is derived from its range of historic buildings and spaces focussed 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. Where these are relevant to our assessment, they are considered in full at Section 9.
- 12.23 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.
- 12.24 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.
- Setting Considerations**
- 12.25 An assessment of the effects of the Proposed Illumination on the setting of heritage receptors identified within the Study Area is provided in Section 8. The effects arise from the new memorial, both during the day and at night, where it features within the setting of heritage assets.
- 12.26 Any impact on the setting of listed buildings, having a material effect on the ability to appreciate significance or on significance itself, is a matter of considerable importance and weight under the terms of section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. Impacts on the setting of other heritage assets is also a significant matter under the terms of policy, nationally and locally.
- 12.27 Paragraph 200 of the NPPF highlights that local planning authorities should look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.

- 12.28 Historic England's guidance on the Setting of Heritage Assets (GPA3) states that enhancement to the setting of heritage assets may be achieved by actions including:
- introducing a wholly new feature that adds to the public appreciation of the asset;
  - introducing new views (including glimpses or better framed views) that add to the public experience of the asset, and/or;
  - improving public access to, or interpretation of, the asset including its setting.

*Westminster and Westminster Abbey including St Margaret's Church World Heritage Site*

- 12.29 In relation to the Westminster WHS, the salient consideration is whether the Proposed Development 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 on Heritage Impact Assessments for Cultural World Heritage Properties' (2011) and the Mayor's 'London World Heritage Sites – Guidance on Settings' SPG (2012). 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.
- 12.30 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.
- 12.31 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.

- 12.32 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 park will be able to appreciate the form of the Victoria Tower from a new, elevated perspective, creating an interesting new viewing position.
- 12.33 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 park, which already contains a number of memorials, and this would frame its contribution to the setting of the WHS.
- 12.34 Whilst the memorial would appear in some views from the south of the park towards the WHS, so curtailing 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 positively respond, and remain subservient to, the Houses of Parliament.
- 12.35 The impact of the NHM at night has also been considered. This is addressed in more detail in the Visual Impact Assessment at Section 10, 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 also be preserved.

*Houses of Parliament and the Palace of Westminster*

- 12.36 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.

- 12.37 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.

*Buxton Memorial Fountain*

- 12.38 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.
- 12.39 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.

- 12.40 There is an aspiration to restore the Buxton Memorial Fountain, including its use as a fountain. This aspiration will, however, require a separate listed building consent, and so does not form part of the proposals assessed by this ES.
- 12.41 Whilst the Memorial leads to some heritage impacts, the Proposed Development is, according to our professional judgment, an entirely appropriate addition which responds sensitively to both its material and context and overall would not cause any net heritage harm to identified heritage receptors, thus paragraphs 195 and 196 of the NPPF are not engaged. Indeed, as outlined above, the Proposed Development would have a beneficial residual effect on a number of identified heritage receptors.

#### Overview of Assessment: Townscape

- 12.42 The TVIA component of this Volume of the ES has been prepared in accordance with best practice guidance as it applies to urban situations. The scoping opinion outlined the methodology to be applied, and we have incorporated observations on that which came back from the consultation responses. Our approach is outlined in Section 2 of this Volume of the ES.
- 12.43 Townscape is the urban equivalent of landscape, and its character is the product of buildings, spaces, and uses taken together. In assessing impacts the assessment has taken into account the expectations and experiences of people moving across an area.
- 12.44 The townscape assessment identifies 10 townscape character areas of varying sensitivity, and a plan of these is reproduced at Technical **Appendix 3.1: Figure 1.1.3: Townscape Character Area Plan**. These character areas include recognised heritage designations, and have been defined in relation to their characteristic uses, physical traits and building types and forms.
- 12.45 The most sensitive character areas are considered to be:
- Character Area 1: Victoria Tower Gardens
  - Character Area 2: Westminster World Heritage Site and Parliament Square

- 12.46 In relation 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.
- 12.47 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 careful landscape management, and a careful Visitor Management Strategy. 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.
- 12.48 The ES concludes the residual effects of the Proposed Development on sensitive townscape character areas would be beneficial, and in the case of Character Area 1: Victoria Tower Gardens the Proposed Development would be **Moderate Beneficial**.

#### Overview of Assessment: Visual

- 12.49 The visual baseline was established on the basis of consultation with Westminster City Council, statutory consultees and formal EIA Scoping Opinions.
- 12.50 A Candidate View Study of the Proposed Development from over 40 viewpoints was also prepared by Hayes Davidson as part of the assessment to determine the scope for the Proposed Development to be visible within the study area.
- 12.51 The range of potential visual impacts have been considered against a very sound base of understanding, and with the assistance of visualisation consultants, Hayes Davidson, who have worked on many schemes across central London. This Section of the ES is supported by AVRs from 22 viewpoints, which have a relationship with heritage receptors, areas of townscape quality and visual receptors identified in the assessment.
- 12.52 In addition, the application submission includes visualisations of the Proposed Development, the Design and Access Statement and architectural plans prepared by Adjaye Associates.
- 12.53 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 beneficial in their effect, or negligible. This results from the limited magnitude of change.
- 12.54 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.
- 12.55 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.

- 12.56 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.
- 12.57 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.
- 12.58 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.
- 12.59 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.
- 12.60 It follows from this analysis, that the range of visual effects in this case span the category of moderate adverse to moderate beneficial. The reader must look at the several accurate visual representations (AVRs) and supporting assessment in Section 10 to understand that range.

### Conclusions

- 12.61 These proposals have been the product of careful consideration with the benefit of visual testing during the design development process. This has been possible because of the extensive HTVIA work done in connection with the scheme and the extensive amount of work undertaken during the design competition and the pre-application stage. As a result, the architectural and consultant team have sought to mitigate potential harmful impacts, avoid them or ensure they are beneficial through the use of good design.
- 12.62 Overall, taking a broad view of all the topics, we conclude that the Proposed Development comprises a well-considered and high quality memorial, which will be a positive addition to the Victoria Tower Gardens and would deliver significant benefits in the form of a national holocaust memorial and learning centre. Whilst the Memorial leads to some heritage and visual impacts, the Proposed Development is, according to our professional judgment, an entirely appropriate addition which responds sensitively to both its material and context and overall would not cause any net heritage harm to identified heritage receptors. The scale of the Memorial is entirely commensurate with its subject, and its form and appearance are appropriate to its location and context. The proposals are therefore considered to be compliant with relevant planning policy provisions.

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APPENDIX 1: Heritage Baseline

## 1.0 BASELINE: BUILT HERITAGE

- 1.1 This Appendix presents the existing built heritage baseline comprising the identification of all built heritage receptors using the methodology set out at **Section 2.0** of **Volume 3.0** of this ES.
- 1.2 A study area of 500m from the Application Site has been considered.
- 1.3 Owing to the nature of the Proposed Development, the potential impact on heritage receptors will largely be limited to visual effects, with some limited effect on character relating to the change to the land within the Application Site.
- 1.4 In consequence, professional judgment has been used to select those built heritage receptors that may undergo change to their setting, and by extension, may experience an effect upon their heritage value or its appreciation. These are:
- Palace of Westminster, Westminster Abbey and St Margaret’s Church World Heritage Site;
  - Victoria Tower Lodge and gates to Black Rod Garden (grade I);
  - Statuary group of the Burghers of Calais (grade I);
  - St John’s Smith Square Concert Hall (grade I);
  - Statue of Robert Clayton at north entrance to ward block of north wing of St Thomas’ Hospital (grade I);
  - Buxton Memorial Fountain, Victoria Tower Gardens (grade II\*);
  - Bronze Statue of Edward VI at north entrance to ward block of north wing of St Thomas’ Hospital (grade II\*);
  - 6-9 Smith Square (grade II\*);
  - The Church Commissioners (grade II\*);
  - 9, Little College Street, SW1 (grade II\*);
  - Knife Edge two piece sculpture (grade II\*);
  - Block 9 of St Thomas’ Hospital Medical School (grade II);
  - Fifteen Public Benches on Embankment footpath between Lambeth Bridge and Westminster Bridge (grade II);
  - Wall along western boundary of St Thomas’ Hospital (grade II);
  - 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 (grade II);

- Norwest House (grade II);
- Millbank Tower (grade II);
- K6 telephone kiosk, Lambeth Palace Road/ Albert Embankment (grade II);
- 7 Lampstandards Numbered G4, 5, 6 and G9, 10, 11 and 12 (grade II);
- Thames House (north and south blocks with bridge link) (grade II);
- Lampstandard numbered G1 on corner of Smith Square (grade II);
- River Embankment from the Houses of Parliament to Lambeth Bridge (grade II);
- Statue of Mrs Emmeline Pankhurst (grade II);
- South wing at St Thomas’ Hospital excluding post-1926 courtyard infill buildings (grade II);
- Victoria Tower Gardens (grade II Registered Park & Garden);
- Westminster Abbey and Parliament Square Conservation Area;
- Smith Square Conservation Area;
- Albert Embankment Conservation Area; and
- Lambeth Palace Conservation Area.

- 1.5 These receptors are included in the main chapter at **Section 5.0** of the ES Volume.
- 1.6 A number of other heritage receptors also lie within the study area. In most cases, these are unlikely to be affected by the Proposed Development, though for completeness we have included assessments of those receptors, and their settings, to demonstrate why these have not been taken forward to full assessment stage.

### World Heritage Site

#### Palace of Westminster, Westminster Abbey and St Margaret’s Church World Heritage Site

- 1.7 The Palace of Westminster, Westminster Abbey and St Margaret’s Church World Heritage Site (The ‘Westminster World Heritage Site’ or ‘WHS’) was inscribed in 1987, and its boundaries modified in 2008.

#### *The WHS buildings*

- 1.8 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 (**Figure 5.2**). 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 south west.

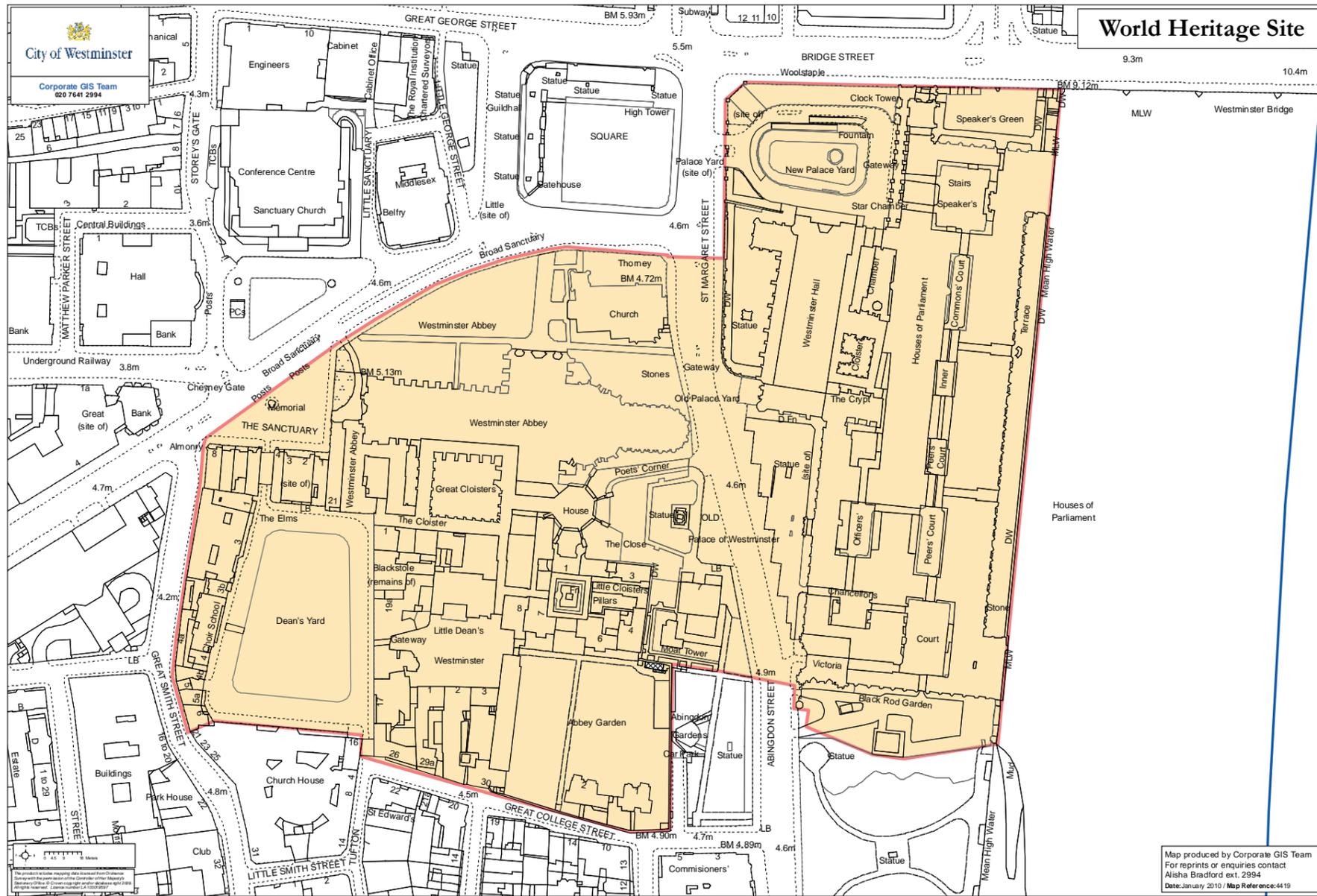


Figure 1.1 Plan of the Westminster World Heritage Site

- 1.9 The earliest record of a church at the site dates from the 7th century, and a Benedictine Monastery was founded at Westminster circa 960 by St Dunstan. Westminster Abbey was begun by Edward the Confessor, and was consecrated in 1065, ahead of his own interment behind its high altar in 1066. Following the Norman Conquest, the first coronation (William I) was held in the Abbey, establishing a tradition which endures to the present day. The building underwent substantial alteration under Henry III in the 13th century, and has subsequently been altered piecemeal over successive centuries, including the addition of a chapel to the Virgin Mary under Henry VII, and two 18th century western towers by Nicholas Hawksmoor.
  - 1.10 St Margaret's Church was built in the late 11th century, and became the parish church of the Palace of Westminster in 1614. It was later altered and restored by Sir George Gilbert Scott in 1877.
  - 1.11 Thorney Island, on which much of the WHS stands, is believed to have been a Royal residence since the time of King Canute (1016-1035). Westminster Hall remains as a remnant of that build by William II (1056-1100), and remained as the monarch's principal residence through the medieval period. Much of the medieval palace was destroyed by fire in 1512 and 1834, with the latter destroying many later additions such as Sir John Soane's neo-classical libraries and the neo-Gothic Houses of Lords and Commons by James Wyatt.
  - 1.12 The present building incorporates surviving elements of the earlier palace, such as St Stephen's Chapel and Westminster Hall, but is, in the main, the work of Augustus Pugin and Charles Barry, who were responsible for the reconstruction of Parliament following the 1834 fire.
- Heritage value (Outstanding Universal Value) of the World Heritage Site*
- 1.13 The World Heritage Site derives its heritage value 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.

- 1.14 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. 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."*
- 1.15 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.
- 1.16 The receptor is of **Exceptional** value.  
*Contribution of setting to heritage value*
- 1.17 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."*
- 1.18 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 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 Archbishops of Canterbury.
- 1.19 Adjacent to the north west of the WHS is Parliament Square, a busy traffic roundabout 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.
- 1.20 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.
- 1.21 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.
- Registered Park and Garden**  
**Victoria Tower Gardens (grade II)**
- 1.22 The Victoria Tower Gardens were added to the Register of Parks and Gardens of special historic interest in 1987.
- 1.23 The park takes its name from Parliament's Victoria Tower, which is part of the House of Lords. In its present form, the garden was created in five main phases, dating to c. 1874, 1880-1881, 1910-1914, 1956-1959, and 2013-2015. A comprehensive account of the gardens' historical development is given at **Section 5.0**.
- 1.24 The park contains a number of listed monuments, including Rodin's Burghers of Calais (grade I), the Buxton Memorial Fountain (grade II\*) and a statue of Emmeline Pankhurst (grade II). It also encompasses part of the listed Victoria Embankment.
- 1.25 Recent changes to the park have included alterations to the playground and the construction of the Parliamentary Education Centre in the northern part of the garden, which was granted temporary consent (for ten years) in 2015.
- 1.26 The gardens possess historic interest for its piecemeal development, and as an important area of partially reclaimed land adjacent to the Westminster World Heritage Site.
- 1.27 The receptor is of **Medium** value.  
*Contribution of setting to heritage value*
- 1.28 The park is broadly triangular in shape, bordering the River Thames to the east, Millbank to the west, and the Black Rod Garden and the Palace of Westminster to the north.
- 1.29 The Victoria Tower, for which the garden is named, is a dominant element in its setting and makes a positive contribution to the character of the open space. The proximity to the Palace of Westminster and the open space of the river define the park, and create a quiet, spacious enclave within the densely urban environment within central London.

**Parliament Square (grade II)**

- 1.30 Parliament Square was added to the Register of Historic Parks and Gardens in 1996. It comprises a ceremonial public square, subject to a range of alterations in phases during the early and mid-19th century, and the post-war period.
- 1.31 The square possesses historic and architectural interest as a planned public square in this part of London. It also makes an important contribution to the setting of the Westminster World Heritage Site, and forms a key viewing area for the Palace of Westminster, Westminster Abbey and St Margaret's Church.
- 1.32 The square contains a number of designated statues, which are considered separately with other listed buildings. These contribute to the sense of the square as centre of government, and provide focal points for visitors.
- 1.33 The receptor is of **Medium** value.  
*Contribution of setting to heritage value*
- 1.34 The square has an open character, surrounded by a number of the main traffic routes through central London, which separate the area of the Registered Park from surrounding development.
- 1.35 Built development around Parliament Square almost entirely comprises listed buildings. To the south and east are the boundaries of the Westminster World Heritage Site, within which Westminster Abbey and the Houses of Parliament are highly recognisable landmarks and make a positive contribution to the Square's value.
- 1.36 There is no intervisibility or other setting relationship between the square and the Application Site, which does not contribute to its heritage value or appreciation. Therefore, the receptor is scoped out of further assessment.

**Lambeth Palace (grade II)**

- 1.37 The Lambeth Palace gardens were added to the Register of Historic Parks and Gardens in 1987, and comprise 2.5 hectares associated with Lambeth Palace, historically used for growing food for the Archbishop's residence.
- 1.38 The area developed over the subsequent centuries to include a flour mill, pleasure ground, a simmer house and various other amenities. The gardens were used as allotments during the First World War, and following considerable bomb damage during the Second World War, underwent renovation. They are now heavily altered from their historic form.
- 1.39 The enclosed gardens are set back from the Thames, to the east of Lambeth Palace Road. They adjoin the Archbishop's Park to the east, which forms a heavily altered part of the former lands of the space, and is now a public open space with play equipment and sports pitches.
- 1.40 The gardens are principally associated with Lambeth Palace, which is situated within its boundaries.
- 1.41 The value of the receptor is **Medium**.  
*Contribution of setting to heritage value*
- 1.42 The park is bordered with high walls preventing public access and visibility. The surrounding area does not contribute to the special interest of the gardens.
- 1.43 The Application Site makes no contribution to the setting or appreciation of the receptor, which is therefore scoped out of further assessment.

**Conservation Areas****Whitehall Conservation Area (CoW)**

- 1.44 The Whitehall Conservation Area was first designated in 1969, as part of the larger Government Precinct Conservation Area, and later re-designated in 1987 as the Whitehall CA.
- 1.45 A small amount of the southernmost part of the CA falls within the boundaries of the study area. Its focus is upon the north-south linear route of Whitehall, which has a high preponderance of national government buildings dating from the 19th-20th centuries, the majority of which are included on the statutory list. Many buildings within the CA are of national importance, including the residences of the Prime Minister and Chancellor of the Exchequer, The Banqueting House and Ministry of Defence.
- 1.46 Open space in the area includes the Victoria Embankment Gardens, to the east, which are separated from the river frontage by the Victoria Embankment.
- 1.47 The value of this Conservation Area is **medium**.  
*Contribution of setting to heritage value*
- 1.48 The Conservation Area is situated to the immediate north of the Westminster World Heritage Site. The clock and jewel towers are notable landmarks in views south along Whitehall, and contribute to the legibility of the significant governmental function of the area.
- 1.49 To the west, St James' Park is an important open space in the setting of the CA, and the open aspect east to the Thames allows for wide-ranging views to the opposing bank.
- 1.50 The Application Site does not form part of the setting of the receptor, and makes no contribution to its character and appearance.

#### *Westminster Abbey and Parliament Square Conservation Area (CoW)*

- 1.51 Westminster Abbey and Parliament Square Conservation Area was first designated as part of the Government Precinct Conservation Area in 1969, and later re-designated in 1987 under its present name. The Conservation Area includes the Application Site.
- 1.52 The character of the Conservation Area is indivisible from its long evolution, spanning 1,000 years. It contains a large number of national landmarks, including the Palace of Westminster and Westminster Abbey, as well as one of the busiest traffic and pedestrian areas in the city. Towards the south and east are quieter, more enclosed spaces, including some of the semi-private spaces, such as Dean's Yard which form part of Westminster Abbey and Westminster School. These retain their medieval layout, and have an entirely different character from the CA as a whole.
- 1.53 The CA retains its historic street layout, which has developed piecemeal over a number of centuries, shaped by a range of factors including the route of the River Tyburn, patterns of historic land ownership, and widening of historic roads during the Victorian period. Parliament Square, to the north, forms a spacious setting for the arrangement of historic buildings along its perimeter, and allows their group value to be appreciated.
- 1.54 In the south east of the Conservation Area, the Victoria Tower Gardens forms an important open space within the urban environment. The linear form of the gardens and dense tree line channels views north towards the Victoria Tower, and forms the setting of a number of monuments which are included on the statutory list.
- 1.55 The value of this Conservation Area is **high**. Contribution of setting to heritage value
- 1.56 The CA has a densely urban setting which comprises a mix of modern and historic buildings. To the south and west is the Smith Square Conservation Area, with a large number of government buildings along Millbank. To the east, the River Thames provides an open space, allowing for intervisibility between the buildings within the CA, and those on the Albert Embankment, including Lambeth Palace (grade I). This makes a positive contribution to its heritage value and appreciation.

#### *Smith Square Conservation Area (CoW)*

- 1.57 The Smith Square Conservation Area has a mixed character, derived from its commercial and residential development focussed on Smith Square at its core. To the east, Millbank covers an area of the river embankment to the south of Lambeth Bridge.
- 1.58 The character of the Smith Square CA results from its underlying medieval street pattern, and irregular, formal 18th century development in adherence. The focal point of the Conservation Area is Smith Square, which is dominated by the former Church of St John the Evangelist at its centre, and forms the focal point of views from the surrounding streets.
- 1.59 The value of this Conservation Area is **medium**.  
*Contribution of setting to heritage value*
- 1.60 The Conservation Area has a mixed setting, comprised of the Westminster World Heritage Site to the north-east, the river to the east, and mixed residential and commercial development to the south and west. Views out towards Millbank are oblique, and views into the Victoria Tower Gardens are screened by the line of mature trees along the boundary, though the open character of the space contrasts positively with the dense, urban structure within the CA.
- 1.61 The inward-focussed nature of the Conservation Area means that the setting makes a limited contribution to its character and appearance.

#### *Millbank Conservation Area (CoW)*

- 1.62 The Millbank Conservation Area was designated in 1969, and later extended in 1990 to reach its present extent. The designation covers the site of the former Millbank Penitentiary (the first national prison), including Ponsonby Place and an expanse of the River Thames embankment. A small amount of this northernmost extent falls within the study area.

- 1.63 The Millbank CA Audit describes the historical development and character of the CA, which it describes as comprising the following four character areas:
- 1.64 "Within the boundary of the former Millbank Penitentiary is group to the east formed by Tate Britain, the Royal Army Medical College and Queen Alexandra Military Hospital, and to the west, the Millbank Estate. To the south are the 19th century residential terraces of Ponsonby Place and Ponsonby Terrace. Finally, the area includes part of the Millbank Embankment, and a larger stretch of the River Thames." (Paragraph 4.1).
- 1.65 The value of this Conservation Area is **medium**.  
*Contribution of setting to heritage value*
- 1.66 The setting of the Millbank Conservation Area comprises the mixed commercial and residential development to the north-west, and the open space to the river to the east. This allows wide-ranging views across the river towards the opposing bank, which contribute to the character of the CA.
- 1.67 There is no visual or other relationship with the Application Site, which makes no contribution to the setting or appreciation of the CA.

#### *Albert Embankment Conservation Area (LBL)*

- 1.68 The Albert Embankment Conservation Area was first designated in 2001, and the boundaries amended to reach their present extent in 2016.
- 1.69 The CA runs along Lambeth's Thames frontage from the borough boundary with Wandsworth to Westminster Bridge, and includes the embankment walk and retaining walls, and the significant St Thomas' Hospital complex. The CA has a number of public vantage points from which to view the Westminster World Heritage Site.
- 1.70 Architecturally, the Conservation Area has a disparate character, comprising a range of new development along the historically important Albert Embankment, an important, major piece of mid-Victorian engineering and urban planning which occupies a prominent central London position along the river.

- 1.71 Set back from the river frontage are larger areas of 19th century industrial buildings, and St Thomas' Hospital campus is a notable presence to the north.
- 1.72 The CA is characterised by the historic Albert Embankment and riverscape, with some significant historic buildings.
- 1.73 The value of this Conservation Area is **medium**. I  
*Contribution of setting to heritage value*
- 1.74 The CA has a mixed setting, comprised of a range of poor quality post-war buildings on the Lambeth side of the river, the grade I listed Lambeth Palace complex to the south, and the open space of the river to the east, which has a strong influence on the character of the embankment walk. This allows wide views towards the Westminster World Heritage Site and other Conservation Areas, including Millbank. These give the Conservation Area importance through its contribution to the setting and appreciation of London's heritage assets along the River Thames. As such, views towards the Palace of Westminster and the WHS are considered noteworthy, as well as those of the Millbank Tower and Tate Gallery further south.  
*Lambeth Palace Conservation Area (LBL)*
- 1.75 The Lambeth Palace Conservation Areas was first designated in 1968, and subsequently extended a number of times. It reached its present extent in 2016.
- 1.76 The Conservation Area comprises the medieval complex of buildings at Lambeth Palace. The CA includes the Garden Museum (formerly the Church of St Mary) and a number of open spaces, including the large, private garden of Lambeth Palace, the public Archbishop's Park, the smaller, historic burial ground of Old Paradise Gardens and the historic churchyard to the former Church of St Mary.

- 1.77 The CA is set adjacent to the river, with intervisibility across to the north bank. It is adjacent to the Westminster World Heritage Site, with which the palace has strong historical connections, and the intervisibility between the two contributes to the heritage value of both.
- 1.78 The value of this Conservation Area is **High**.  
*Contribution of setting to heritage value*
- 1.79 The Lambeth Palace CA Appraisal notes the significance of the constitutional and physical relationship between the buildings within the CA and the Palace of Westminster. The river facilitated quick transport between the two, and their visual relationship allows for an appreciation of this important proximity.
- 1.80 The Victoria Tower Gardens make a positive contribution to views toward the WHS from the CA, and as such make a positive contribution to its character.

#### Listed Buildings in the City of Westminster

- 1.81 Where appropriate, listed buildings within the study area have been assessed within groups of similar receptors which share the key elements of their setting.  
*Within the Victoria Tower Gardens*  
*Statuary Group of the Burghers of Calais (grade I)*
- 1.82 The Statuary group of the Burghers of Calais ('Les Bourgeois de Calais') was added to the statutory list in 1970.
- 1.83 The sculpture commemorates an event from the Hundred Years' War (1337-1453), comprising a bronze group of figures on a stone pedestal, erected in 1915 by Auguste Rodin. The history of its presentation in the park is discussed at **Section 4.0**.
- 1.84 The statue has historic and architectural (design) significance as a notable work by Rodin, and one of only twelve casts in the world.
- 1.85 The value of this receptor is **High**.  
*Statue of Mrs Emmeline Pankhurst (grade II)*
- 1.86 The Statue of Mrs Emmeline Pankhurst was added to the statutory list in 1970.
- 1.87 The statue was sculpted by AG Walker and erected in 1930, before being moved to its present location in 1956. It depicts the women's suffrage leader in bronze, on a stone pedestal with side screens.
- 1.88 The statue possesses historic and architectural interest as a commemorative work depicting a notable historical figure, and as an attractive sculpture which makes a positive contribution to the Victoria Tower Gardens.
- 1.89 The value of this receptor is **Medium**.

<p><i>River Embankment from the Houses of Parliament to Lambeth Bridge (grade II)</i></p> <p>1.90 The River Embankment was added to the statutory list in 1987. It comprises the 19th century embankment wall, with mooring rings and weather coped parapet.</p>	<p>1.97 Finally, it was placed in the Victoria Tower Gardens in 1957. It has since been restored in 1980, and more recently by Royal Parks in 2007.</p>	<p><i>Parliament Square</i></p> <p><i>Middlesex Guildhall (grade II*)</i></p>
<p>1.91 The embankment possesses historic and architectural interest as part of the Victorian alterations to this part of the river bank, and forms an intrinsic part of the riverside experience in this part of London.</p>	<p>1.98 The fountain possesses historic and architectural interest as a good example of a memorial associated with Parliament, and as a work by SS Teulon.</p>	<p>1.105 Middlesex Guildhall is situated on the west side of Parliament Square, and was added to the statutory list in 1970. It dates from the early 20th century, by JGS Gibson with Skipwith and Gordon, in a free late Gothic style, over three storeys. The building has since been repurposed as the new Supreme Court.</p>
<p>1.92 The value of this receptor is <b>High</b>.</p>	<p>1.99 The value of this receptor is <b>High</b>.</p>	<p>1.106 The Guildhall possesses historic and architectural interest as a good example of an early 20th century local government building, which makes an important contribution to the Parliament Square arrangement.</p>
<p><i>Buxton Memorial Fountain, Victoria Tower Gardens (grade II*)</i></p>	<p><i>Contribution of setting to heritage value</i></p>	
<p>1.93 The Buxton Memorial Fountain was added to the statutory list in 1970.</p>	<p>1.100 The Buxton Memorial is situated within the Victoria Tower Gardens, towards the eastern, or river side. Its setting is defined primarily by the space within the park, bounded by dense tree belts east and west. There is a small interpretation board to the east of the monument, which gives an overview of its heritage value.</p>	<p>1.107 The value of this receptor is <b>High</b>.</p>
<p>1.94 The memorial is an octagonal structure in a gothic style, designed by SS Teulon and Charles Buxton MP (son of Sir Thomas Buxton) in 1865. The memorial commemorates the emancipation of slaves in Britain in 1834, and originally had statuettes (since lost) of British and English rulers: Caractacus, the Emperor Constantine, Canute, King Alfred, William the Conqueror, Henry VII, Charles I and Queen Victoria. The metal figures, by T. Earp, which once stood at eaves level, were stolen in 1960 and 1971. These were recast in 1980, but have since disappeared.</p>	<p>1.101 The proximity to parliament, the forum in which the 1833 Slavery Abolition Act was enacted, is an important part of its setting, and the Gothic detailing of the memorial responds to that of the towers.</p> <p>1.102 The convergence of paths around the monument contributes to a transient experience, whereby visitors move past and around the memorial whilst traveling through the park, and do not necessarily engage with the monument, or reflect upon its purpose.</p>	<p>1.108 Parliament square also includes a number of designated sculptures and monuments, listed below:</p> <ul style="list-style-type: none"> <li>■ Statue of Abraham Lincoln in front of Middlesex Guildhall (grade II);</li> <li>■ Statue of Sir Winston Churchill (grade II);</li> <li>■ Statue of Field Marshal Jan Smuts (grade II);</li> <li>■ Statue of Edward Stanley, Earl of Derby (grade II);</li> <li>■ Statue of Benjamin Disraeli, Earl of Beaconsfield (grade II); and</li> <li>■ Statue of Sir Robert Peel (grade II).</li> </ul>
<p>1.95 The construction of the fountain and its waterworks was undertaken by the Metropolitan Drinking Fountain Association. It was originally erected in Parliament Square circa February 1866, but was removed from its original position in 1949, when the Government redeveloped Parliament Square to Grey Warnum's new layout in preparation for the Festival of Britain.</p>	<p>1.103 The open space of the park allows the attractive form and detailing of the memorial to be appreciated. From the east, there are some partial views of the monument along Dean Stanley Street, which is on an axis to Smith Square.</p>	<p>1.109 These have intrinsic heritage value for their artistry and as commemorative structures. Collectively, they contribute to the character and gravitas of Parliament Square, and, by extension, the setting of the Houses of Parliament.</p>
<p>1.96 In December 1949, it was established through a condition of the removal of the fountain from Parliament Square that it should be re-erected in the vicinity. The site for relocation was debated in the Commons in November 1955, when the Minister of Works emphasised that the Anti-Slavery Society had originally wanted it to stand near Parliament. The Ministry of Works proposed to re-erect the fountain in Victoria Tower Gardens.</p>	<p>1.104 The setting of the receptor makes a mixed contribution to its heritage value. Its location close to Parliament contributes to its historic interest, though appreciation of the monument's purpose is limited by its placement at the convergence of paths within the park, which inadvertently places the memorial as the central feature of a pedestrian traffic island.</p>	<p>1.110 The value of these receptors is <b>Medium</b>.</p> <p><i>Contribution of setting to heritage value</i></p>
		<p>1.111 The listed buildings and structures at Parliament Square form an important part of the setting of the Westminster World Heritage Site, and appear in important views towards the Palace of Westminster and Westminster Abbey from the north-west. In return, the WHS buildings contribute to the legibility of the area as the heart of the national government.</p> <p>1.112 The space of the square has a contained character within the dense, urban locality, which screens most views of the wider environment.</p> <p>1.113 The Application Site does not contribute to the significance, or appreciation thereof, of this group of receptors.</p>

	<b>Within the Westminster World Heritage Site: south of Westminster Abbey</b>		<i>The Great Cloisters including St Faith's Chapel, the Chapter House, The Parlour, Nos. 1 &amp; 2 The Cloisters, The Dark Cloisters and Dormitory with the Chapel of St Dunstan (School and Busby Library) (grade I)</i>		<i>Little Deans Yard (College of Westminster School) (grade I)</i>
1.114	The Westminster World Heritage Site contains a high proportion of listed buildings which collectively contribute to its Outstanding Universal Value, as well as possessing their own intrinsic heritage interest.	1.121	This receptor was added to the statutory list in 1958, and comprises part of the complex of Abbey buildings which remain in use by Westminster School. They possess historic and architectural interest as a very early part of the wider abbey complex, with some parts remaining from the 11th and 12th centuries, as well as remnants of Henry III's alterations to the building.	1.131	This receptor was added to the statutory list in 1970, and comprises a school dormitory designed by Lord Burlington, dating from 1722-1730. It possesses historic and architectural interest for its association with Burlington and as a school dormitory associated with the wider Westminster School complex.
1.115	Not all of the buildings within the World Heritage Site have a setting relationship with the Application Site. Those receptors which are situated within the tight enclave of historic buildings to the south west of Westminster Abbey have a contained setting within their immediate environment. The receptors are entirely screened in views to and from Victoria Tower Gardens, and do not have any historical or other association with the land therein.	1.122	The value of this receptor is <b>High</b> .	1.132	The value of this receptor is <b>High</b> .
1.116	For completeness, we include a brief synthesis of the heritage value of these receptors below.		<i>The Deanery and Sub-Dean's Residence with the Jericho Parlour (grade I)</i>	1.133	<i>Little Deans Yard (grade I)</i> Little Deans Yard was added to the statutory list in 1958, and comprises the House of the Master of the King's Scholars, part of which was remodelled by RWF Brettingham between 1789 and 1790. It possesses historic and architectural interest for its association with Brettingham and as a school dormitory associated with the wider Westminster School complex.
	<i>Clerk of the Works Office and the remains of the Chapel of St Catherine (grade I)</i>	1.123	This receptor was added to the statutory list in 1966, and possesses historic and architectural interest as the 18th century former Abbot's lodging at Westminster Abbey.	1.134	The value of this receptor is <b>High</b> .
1.117	This receptor was added to the statutory list in 1958, and comprises the remains of the late 14th century cloister, lodgings and remains of the Infirmary Chapel. It possesses historic and architectural interest as a surviving part of the early development associated with Westminster Abbey.	1.124	The value of this receptor is <b>High</b> .		<i>Dean's Yard (grade I)</i>
1.118	The value of this receptor is <b>High</b> .		<i>19, 19a and 20, Broad Sanctuary SW1 (grade I)</i>	1.135	This receptor was added to the statutory list in 1958, and comprises a late 14th century school house with an archway to Little Dean's Yard. It possesses historic and architectural interest as part of the western range of Abbey buildings.
	<i>Abbey Precinct Wall (grade I)</i>	1.125	This receptor was added to the statutory list in 1958, and possesses historic and architectural interest as a late 14th and early 15th century range of abbey buildings.	1.136	The value of this receptor is <b>High</b> .
1.119	The Abbey Precinct Wall was added to the statutory list in 1958, and possesses historic and architectural interest as an early medieval precinct wall for Westminster Abbey, dating predominantly from the late 14th century.	1.126	The value of this receptor is <b>High</b> .		<i>Dean's Yard (grade I)</i>
1.120	The value of this receptor is <b>High</b> .		<i>Little Deans Yard Ashburnham House (grade I)</i>	1.137	This receptor was added to the statutory list in 1958, and possesses historic and architectural interest as the Westminster School headmaster's House, dating predominantly to the late 18th century.
		1.127	Little Deans yard Ashburnham House was added to the statutory list in 1958, and possesses historic and architectural interest as a good example of a Commonwealth period townhouse, incorporating part of the earlier, 14th century Prior's Lodging.	1.138	The value of this receptor is <b>High</b> .
		1.128	The value of this receptor is <b>High</b> .		<i>Number 7 (including former Number 6) (grade II*)</i>
			<i>Little Deans Yard Staircase to Doorway at Gateway to School and Busby Library (grade I)</i>	1.139	Number 7 was added to the statutory list in 1970, and possesses historic and architectural interest as a pair of townhouses built as the residences and offices of the Clerks of the Parliaments in the mid-18th century.
		1.129	This receptor was added to the statutory list in 1970, and possesses historic and architectural interest as a stone gateway and staircase dating to the 17th and early 18th century, which link the Busby Library to Little Dean's Yard.	1.140	The value of this receptor is <b>High</b> .
		1.130	The value of this receptor is <b>High</b> .		

- Abbey Precinct railings to west of Abbey and to east end and Abbey Close (grade II)*
- 1.141 This receptor was added to the statutory list in 1970 and possesses historic and architectural (design) interest as a range of 17th/ 18th century cast iron railings by JL Pearson or WD Caroe.
- 1.142 The value of this receptor is **Medium**.
- Abbey (Canons') Garden 4 Statues (grade II)*
- 1.143 The four statues were added to the statutory list in 1970, and possess historic and architectural (design) interest as works of 1686 by notable artist Grinling Gibbons and Arnold Quellin, depicting the Apostles.
- 1.144 The value of this receptor is **Medium**.
- Little Dean's Yard Turle's House (grade II)*
- 1.145 This receptor was added to the statutory list in 1970, and possesses historic and architectural interest as a school house of 1884 by JL Pearson, incorporating part of an 11th century reredorter and dark cloister of Westminster Abbey.
- 1.146 The value of this receptor is **Medium**.
- Abbey (Canons') Garden (grade II)*
- 1.147 This receptor was added to the statutory list in 1987, and comprises a former canon's house built by JL Pearson in 182. The building possesses historic and architectural interest as a good example of a 19th century canon's house which forms part of the wider Westminster Abbey complex.
- 1.148 The value of this receptor is **Medium**.
- Little Deans Yard (grade II)*
- 1.149 This receptor was added to the statutory list in 1987, and possesses historic and architectural interest as an 1896 school house by TG Jackson which forms part of the wider Westminster School complex.
- 1.150 The value of this receptor is **Medium**.
- Dean's Yard with Abbey Shop (grade II)*
- 1.151 This receptor was added to the statutory list in 1987, and comprises a range of offices and shops to the rear of the Jerusalem Chamber on Broad Sanctuary. The building possesses historic and architectural interest as part of the Westminster Abbey complex built circa 1800 as offices for the Dean and Chapter.
- 1.152 The value of this receptor is **Medium**.
- Choir School and Dean's Yard (grade II)*
- 1.153 This receptor was added to the statutory list in 1987 and possesses historic and architectural interest as a range of school buildings by G Wallace, built circa 1915.
- 1.154 The value of this receptor is **Medium**.
- 3 lamp standards to south end outside No. 5a and Church House, 10 lamp standards round central green of Dean's Yard (grade II)*
- 1.155 These lamp standards were added to the statutory list in 1970 and possess historic and architectural (design) interest as mid to later 19th century cast iron lamp standards with square bases.
- 1.156 The value of this receptor is **Medium**.
- The Sanctuary (grade II)*
- 1.157 The Sanctuary was added to the statutory list in 1970 and possesses historic and architectural interest as a range of terraced houses and attached gateway to Dean's Yard built in 1853-1854 to designs by Sir George Gilbert Scott.
- 1.158 The value of this receptor is **Medium**.
- Contribution of setting to heritage value*
- 1.159 These receptors are entirely screened from the Application Site by virtue of their scale, orientation, and the interposing development between the two. There are no historical or other significant associations between the buildings and the land at the Application Site, which makes no contribution to their setting. Therefore, they are scoped out of further assessment.
- Within the Westminster World Heritage Site: Environs of Abingdon Street*
- Houses of Parliament and the Palace of Westminster (grade I)*
- 1.160 The Houses of Parliament and Palace of Westminster were designated in 1970. They are of exceptional heritage value owing to their piecemeal architectural development spanning almost 900 years, and historical interest as the seat of government.
- 1.161 Westminster Hall forms the earliest part of the building, and was first constructed between 1097 and 1099. Later alterations include remodelling between 1394-1401 by Henry Yevele and Hugh Herland.
- 1.162 St Stephen's Chapel dates from circa 1292-1297, with later alterations in 1320 and the associated cloister and chantry chapel built between 1526 and 1529.
- 1.163 The Houses of Parliament were built later, in a sympathetic style, in the early 19th century.
- 1.164 The value of this receptor is **Exceptional**.
- Church of St Margaret, Westminster (grade I)*
- 1.165 The Church of St Margaret was first designated in February 1958.
- 1.166 The church was founded in the late 11th century, and first recorded under Abbot Herbert circa 1121-1136. It was rebuilt in the early 16th century by Westminster Abbey Masons Robert Stowell and Henry Redman, and later alterations have included the rebuilding of the majority of the tower in 1735-1737, re-facing in Portland stone and renewing tracery.
- 1.167 The East Window has Gothic-Renaissance Flemish stained glass, which was probably part of Catherine of Aragon's dowry.
- 1.168 The receptor possesses historic and architectural interest for its long history, as the former parish church of the Palace of Westminster, and as part of the arrangement of state and ecclesiastical buildings within the Westminster World Heritage Site.
- 1.169 The value of this receptor is **Exceptional**.

<p><i>Gates, Railings, Gate Piers to New Palace Yard, Houses of Parliament (grade I)</i></p> <p>1.170 This receptor was added to the statutory list in 1970, and comprises a range of wrought iron railings with Portland stone piers by EM Barry, built circa 1860-1867. It possesses historic and architectural (design) interest as part of the Palace of Westminster complex and for the association with EM Barry.</p>	<p>1.178 The listing description describes the Abbey as “a unique embodiment of church, state and crown, and national mausoleum.” It has exceptional historical and architectural value, and forms a key constituent part of the Westminster World Heritage Site.</p>	<p>1.1 These receptors are of <b>Medium</b> value.</p>
<p>1.171 The value of this receptor is <b>High</b>.</p>	<p>1.179 The value of the receptor is Exceptional.</p>	<p><i>St Margaret’s Churchyard Railings, Obelisks and Bollards (grade II)</i></p>
<p><i>Victoria Tower Lodge and Gates to Black Rod Garden (grade I)</i></p>	<p><i>The Jewel House (Or Tower) of The Palace of Westminster and Former Dock Retaining Walls to Moat around Jewel House (grade I)</i></p>	<p>1.2 This receptor comprises a set of early 18th century railings with obelisk piers and incorporated bollards, marking the boundaries of St Margaret’s Churchyard.</p>
<p>1.172 The Victoria Tower Lodge and Gates to Black Rod Garden were designated in 1987. They form the entrance to Black Rod Garden, adjacent to the Palace of Westminster, which lies to the north, and date from circa 1850-1860, as part of the designs for the Palace of Westminster created by AWN Pugin and Sir Charles Barry.</p>	<p>1.180 The Jewel House forms an isolated part of the medieval palace of Westminster. It was built in 1365-66 by Henry Yevele for Edward III, as a repository for the King’s personal treasure. It is one of only four surviving buildings of the medieval Palace of Westminster, with Westminster Hall, St Stephen’s Cloister and the Chapel of St Mary Undercroft beneath St Stephen’s Hall, and the only surviving part of the Privy Palace.</p>	<p>1.3 The receptor possesses historic and architectural interest as a good example of an early 18th century boundary treatment, which forms part of the St Margaret’s Church ensemble.</p>
<p>1.173 The lodge has an octagonal footprint, and comprises one storey with a pointed arched doorway and cusped lancet lights. The gate piers are also octagonal, with Gothic ironwork to the gates.</p>	<p>1.181 It is built in squared ragstone with Portland stone window dressings and some ashlar to lower parts, in an L-shaped plan form with a north polygonal stair turret.</p>	<p>1.4 There are a number of listed lamp standards within this area, which are:</p> <ul style="list-style-type: none"> <li>■ 6 Lampstandards in St Margaret’s Churchyard lettered G (grade II);</li> <li>■ 5 Lamp Standards Lettered G (grade II); and</li> <li>■ 4 Lampstandards flanking Carriage Drive in New Palace Yard, Houses of Parliament (grade II).</li> </ul>
<p>1.174 The value of the receptors is High.</p>	<p>1.182 Despite some later alterations, the Jewel Tower survives remarkably well. As a purpose-built strong-room it is a rare example of its type and includes some extremely fine 14th century vaulting and masonry work. It is of exceptional historical interest as part of Westminster Palace, the principal seat of the monarchy and the permanent seat of government for almost five hundred years. As a design by the royal mason Henry Yevele, a key figure in the development of English Perpendicular Architecture, it is of major architectural interest.</p>	<p>1.5 These have intrinsic heritage value as well-crafted lamp standards, and form part of the historic street furniture in the area which also makes a positive contribution to the character of the World Heritage Site.</p>
<p><i>Contribution of setting to heritage value</i></p>	<p>1.183 Following excavations in the 1960s, part of the moat has been reconstructed, which makes a positive contribution to the setting of the tower.</p>	<p>1.6 The value of these receptors is <b>Medium</b>.</p>
<p>1.175 The setting of the Lodge and Gates is contained within the busy frontage to Abingdon Street, which forms a popular tourist thoroughfare. The dense tree line surrounding Victoria Tower Gardens limits views of the park and lodge, but the contrast between the busy, urban environment of Abingdon Street and the landscaped open space beyond makes a positive contribution to the setting of the receptor.</p>	<p>1.184 The value of the receptor is Exceptional.</p>	<p><i>Contribution of setting to heritage value</i></p>
<p><i>Westminster Abbey (the Collegiate Church of St Peter) (grade I)</i></p>	<p>1.185 There are a number of designated sculptural works within Parliament Square, which possess intrinsic artistic and historic merit, as well as contributing to the ensemble of Parliament Square as a whole. These are:</p> <ul style="list-style-type: none"> <li>■ Statue of Richard I (grade II)</li> <li>■ Statue of Oliver Cromwell in front of Westminster Hall (grade II)</li> <li>■ Statue of George V (grade II)</li> <li>■ Crimean War and Indian Mutiny Memorial (grade II)</li> </ul>	<p>1.7 The Site makes a positive contribution to the setting of the World Heritage Site and the buildings within 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. 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, as recognised at <b>Section 9.0</b>. 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.</p>
<p>1.176 Westminster Abbey was designated in February 1958. It was first built as Edward the Confessor’s Church circa. 1050-1065, before rebuilding under Henry III in 1245. The building underwent subsequent extensions during the 13th and 14th centuries, with later additions including the Henry VII Chapel circa 1503, and 18th and 19th century restorations by Wren, George Gilbert Scott and others, whose contributions add to the exceptional architectural value of the building.</p>	<p>1.177 The church is built in Reigate stone in a geometric gothic style, with an aisled 11 bay nave. Some 13th century fragments of stained glass survive, though the majority date from the 15th century onwards. These contribute to the building’s considerable historical value.</p>	

- 1.8 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.
- 1.9 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.
- 16, 17 and 18, and 19 Great College Street SW1 (grade II\*)*
- 1.10 These buildings were added to the statutory list in 1958. They comprise a terrace of houses dating from 1720-1722, in brown brick with red brick dressings. The buildings possess historic and architectural interest as a good example of a range of early 18th century townhouses in this part of Westminster.
- 1, 3, 4-6 Barton Street SW1 (grade II\*), 9 and 10, 11-14 Barton Street SW1 (grade II\*), 1-3, 13-19 Cowley Street SW1 (grade II\*), 13-19 Lord North Street (grade II\*)*
- 1.11 These receptors were added to the statutory list in 1987 and 1958. They are terraced houses dating built as part of a unified development in 1722, in brown brick and some with stucco to ground floor. The buildings possess historic and architectural interest as part of a well-preserved enclave of early 18th century housing.
- 1.12 The value of these receptors is **High**.
- Contribution of setting to heritage value*
- 1.13 These receptors are set within an area of enclosed townscape, set back from Millbank, to the west of the Application Site.
- 1.14 The Site makes no contribution to their setting or appreciation, and these receptors are thus scoped out of further assessment.
- The Church Commissioners (grade II\*)*
- 1.15 The Church Commissioners was added to the statutory list in 1970, and comprises a 1903 island block of offices by WD Caroe, built in red brick with Portland Stone dressings.
- 1.16 The building has 5-6 storeys with two tiers of dormer windows to the attics, and incorporates details of Free Style northern Renaissance design, including Plateresque motifs and staircase fenestration.
- 1.17 The building possesses historic and architectural interest as a good example of an attractive early 20th century office building by a recognised architect.
- 1.18 The value of this receptor is **High**.
- 9, Little College Street SW1 (grade II\*)*
- 1.19 9, Little College Street was added to the statutory list in 1970, and comprises a terraced house dating from circa 1722, later refaced circa 1900.
- 1.20 The building is of three storeys in red brick, with a polychromatic brick rear to Cowley Street.
- 1.21 The building possesses historic and architectural interest as a good example of a house of this period, and as part of the 'exceptionally well preserved' enclave of 18th century housing in the vicinity.
- 1.22 The value of this receptor is **High**.
- Numbers 2, 4, 5, 7, 8, 10 and 11, Lord North Street (grade II\*)*
- 1.23 This receptor comprises a terrace of houses built between 1720 and 1725. The buildings are brown brick with three storeys, and retain substantial elements to the interior.
- 1.24 The receptor possesses historic and architectural interest as part of the historic townhouse development in the environs of Smith Square.
- 1.25 The receptor is of **High** value.
- 4 Cowley Street SW1 (grade II)*
- 1.26 This receptor was added to the statutory list in 1970, and comprises a terraced town house built by Horace Field for the North Eastern Railway between 1904-1905. The building has a lavish, late 17th century style.
- 1.27 The receptor possesses historic and architectural interest as part of the townhouse development in the environs of Smith Square.
- 1.28 The receptor is of **Medium** value.
- St John's Smith Square Concert Hall (grade I)*
- 1.29 The Concert Hall, formerly the Church of St John the Evangelist, was first designated in February 1958. It was built as a parish church by Thomas Archer in 1713-1728, with later refurbishment following fire damage in 1742, Second World War damage and restoration by Marshall Sisson from 1965-1968.
- 1.30 The building is Portland Stone in the Baroque style, with giant Venetian windows to the east and west end.
- 1.31 The building derives its special historic and architectural interest from its role as "the climax of the exceptionally well preserved early 18th century enclave comprising the north side of Smith Square and Lord North, Barton and Cowley Streets."
- Contribution of setting to heritage value*
- 1.32 The immediate setting of the building is contained by Smith Square, which provides a contemporaneous and sympathetic backdrop against which the landmark quality of the church can be appreciated. Views towards the receptor are predominantly contained within the planned layout of the square.
- 7 Lampstandards numbered G4, 5 and 6 and G9, 10, 11 and 12 (grade II), Lampstandard numbered G1 on corner of Smith Square (grade II)*
- 1.33 These Lampstandards were added to the statutory list in 1987, and possess historic and architectural (design) interest as mid-19th century cast iron lamp standards which form part of a group within the Smith Square layout.

- Thorney House (grade II)*
- 1.34 Thorney House was added to the statutory list in 1970, and comprises a 1913 corner terraced town house in red brick with Portland stone dressings. The building possesses historic and architectural interest as a good example of a 20th century pre-war townhouse.
- 36 and 37, Smith Square SW1 (grade II)*
- 1.35 These receptors were added to the statutory list in 1958 and 1970 respectively. They form terraced townhouses dating to 1911-1912, and form part of the arrangement of townhouses around Smith Square. No. 36 was built to designs by Sir Edwin Lutyens.
- 1.36 The buildings possess historic and architectural interest as part of the arrangement of townhouses at Smith Square, and for their survival as good examples of early 20th century townhouses.
- 1.37 The receptors are of **Medium** value.
- 2 and 4 Dean Trench Street [listed as 59 Tufton Street] SW1 (grade II)*
- 1.38 This receptor was added to the statutory list in 1970, and comprises a row of three townhouses of three storeys in a neo-Georgian style, built in the 1920s.
- 1.39 The buildings possess historic and architectural interest as part of the arrangement of townhouses in the locality, and as good 1920s examples of this building type.
- 1.40 The receptor is of **Medium** value.
- 1 Dean Trench Street SW1 (grade II)*
- 1.41 This receptor was added to the statutory list in 1987, and comprises a block of flats built by architect HS Goodhart-Rendel between 1951 and 1955. It possesses historic and architectural interest as a good example of a post-war design in the Norman Shaw manner.
- 1.42 The receptor is of **Medium** value.
- 3 Dean Trench Street SW1 (grade II)*
- 1.43 3 Dean Trench Street was added to the statutory list in 1970, and comprises a terraced townhouse dating to 1924, in red brick and Portland stone. The receptor possesses historic and architectural interest as part of the early 20th century development in this part of Smith Square.
- 1.44 The receptor is of **Medium** value.
- 57 and 57a, Tufton Street (grade II)*
- 1.45 57 and 57a Tufton Street were added to the statutory list in 1990, and comprise a pair of houses built circa 1925 by Frederick Ernest Williams or Alfred Cox. They are of three storeys with a red brown brick façade with a plain tiled mansard roof.
- 1.46 The buildings possess historic and architectural interest as good examples of 1920s housing in this part of Westminster, and are an attractive feature in the townscape.
- 1.47 The receptor is of **Medium** value.
- North House and Gayfere House (grade II)*
- 1.48 North House and Gayfere House were added to the statutory list in 1970, and comprise an L-shaped group of four terraced town houses, built by Oliver Hill between 1929 and 1932. The buildings are brick with Portland stone detailing, and were interlinked as offices in 1999.
- 1.49 The buildings possess historic and architectural interest as a pair of late 1920s townhouses, later converted for office use.
- 1.50 The receptor is of **Medium** value.
- 62 and 64 Horseferry Road SW1 (grade II)*
- 1.51 62 and 64 Horseferry Road were added to the statutory list in 1987, and comprise a former shelter for destitute boys, built from 1912-1913 to designs by AE Hughes.
- 1.52 The building has five storeys in red brick, with dormers to an attic storey.
- 1.53 The building possesses historic and architectural interest as an early 20th century shelter for destitute boys.
- 1.54 The receptor is of **Medium** value.
- 17-21 Gayfere Street SW1 (grade II)*
- 1.55 17-21 Gayfere Street was added to the statutory list in 1984, and comprises a terrace of 'fourth rate' artisans houses built circa 1800. The terrace is of two storeys, built in stock brick with a stucco plinth and concealed roofs.
- 1.56 The buildings possess historic and architectural interest as a good example of a terrace of 18th century fourth rate terraces in this part of Westminster.
- 1.57 The receptor is of **Medium** value.
- 1 and 2 Smith Square W1 (grade II\*)*
- 1.58 1 and 2 Smith Square were added to the statutory list in 1970, and comprise a pair of 1726 terraced houses built as part of Sir James Smith's development of the square and later rebuilt following damage sustained in the Second World War.
- 1.59 They possess intrinsic historic and architectural interest as houses of this date, and as part of the 18th century enclave of development which also includes Lord North, Barton and Cowley Streets, which collectively make a positive contribution to the setting of the buildings.
- 1.60 The value of these receptors is **High**.
- 3 - 5 Smith Square (grade II\*)*
- 1.61 3-5 Smith Square were added to the statutory list in 1956, and comprise a terrace of houses built in 1726 as part of Sir James Smith's development of the square.
- 1.62 They possess intrinsic historic and architectural interest as houses of this date, and as part of the 18th century enclave of development which also includes Lord North, Barton and Cowley Streets, which collectively make a positive contribution to the setting of the buildings.
- 1.63 The value of these receptors is **High**.

- Lampstandard numbered G1 on corner of Smith Square (grade II), 7 Lampstandards numbered G4, 5 and 6 and G9, 10, 11 and 12 (grade II), Lampstandard numbered G1 on corner of Smith Square (grade II)*
- 1.64 These Lampstandards were added to the statutory list in 1987, and possess historic and architectural (design) interest as mid-19th century cast iron lamp standards which form part of a group within the Smith Square layout.
- 1.65 The value of these receptors is **Medium**.
- 2 Bollards flanking junction of Smith Square and Lord North Street (grade II)*
- 1.66 The two bollards were added to the statutory list in 1970, and comprise a pair of 1720-1725 chamfered, conical shape bollards on the curb edge.
- 1.67 The bollards possess historic and architectural interest as part of the early 18th century street furniture.
- 1.68 The value of the receptor is **Medium**.
- 13 stone bollards on pavement curb surrounding St John's Smith Square Concert Hall (grade II)*
- 1.69 These receptors were added to the statutory list in 1987, and form part of Sir James Smith's original layout of the square. They are built in Portland stone, with a tapered octagonal form.
- 1.70 The bollards possess historic and architectural interest as part of the early 18th century street furniture.
- 1.71 The value of the receptor is **Medium**.  
Contribution of setting to heritage value
- 1.72 The immediate setting of the building is contained by Smith Square, which provides a contemporaneous and sympathetic backdrop against which the landmark quality of the church can be appreciated. Views towards the receptor are predominantly contained within the planned layout of the square.
- Norwest House (grade II)*
- 1.73 Norwest House was added to the statutory list in 1981, and comprises an office block built in 1928 to designs by Sir F Banes, as part of a uniform composition with nearby Thames House.
- 1.74 The building has five storeys in Portland stone, with a 27-bay range and a four storey attic. The exterior elevations are adorned with sculpted figures by Jagger and a Classical manner.
- 1.75 The building possesses historic and architectural interest as an office building by Banes, and as part of planned composition with nearby Thames House.
- 1.76 The value of this receptor is **Medium**.
- 8, Barton Street SW1 (grade II)*
- 1.77 8, Barton Street was added to the statutory list in 1975, and comprises a terraced house built by Horace Field in 1909.
- 1.78 The house is built in red brick and Portland stone with a tiled roof, in the style of a 17th century townhouse.
- 1.79 The building possesses historic and architectural interest as a good example of an early 20th century terraced house by a known architect, which imitates a recognised style of earlier development.
- 1.80 The value of this receptor is **Medium**.
- 10-12 Little College Street SW1 and Lampstandard Numbered G1 (Grade II)*
- 1.81 10-12 Little College Street were added to the statutory list in 1987, and comprise a three storey terrace of houses built between 1895 and 1900 in a combination of Queen Anne and neo-Georgian styles.
- 1.82 The building possesses historic and architectural interest as part of the late 19th/ early 20th century development in the locality.
- 1.83 The value of this receptor is **Medium**.
- Gayfere Lodge, 7 Gayfere Street SW1 (grade II)*
- 1.84 Gayfere Lodge was added to the statutory list in 1970 and comprises a three storey 1930s terraced house by Oliver Hill in red brick with Portland stone dressings.
- 1.85 The building possesses historic and architectural interest as a good example of Hill's 'beau monde' neo-Georgian style.
- 1.86 This receptor is of **Medium** value.
- 10 and 11 Gayfere Street SW1 (grade II)*
- 1.87 10 and 11 Gayfere Street were added to the statutory list in 1986, and comprise a pair of fourth rate terraced houses dating from circa 1800. The buildings have a stock brick exterior, with a concealed roof and two storeys.
- 1.88 The buildings possess historic and architectural interest as good examples of early 19th century 4th rate terraces.
- 1.89 The receptor is of **Medium** value.
- Corner House (grade II)*
- 1.90 Corner House was added to the statutory list in 1987, and comprises a pair of town houses dating from 1911, built to designs by Sir Edwin Lutyens.
- 1.91 The building has a restrained neo-Georgian style, with three storeys and two tiers of dormers in a mansard roof.
- 1.92 The building possesses historic and architectural interest as a work by Lutyens, and as part of the collection of historic townhouses in the locality.
- 1.93 The receptor is of **Medium** value.
- Number 22 including the Chapel of St Peter and St John St Edward's House including St Edward's Chapel (grade II)*
- 1.94 The building was added to the statutory list in 1987, and comprises a building of 1903-1905 by Edward Burgess, built in red brick with stone dressings and a slate roof in a Tudor Gothic style. It has four storeys with a five storey tower, and was the Home and Chapel for the Society of St John the Evangelist.
- 1.95 The building possesses historic and architectural interest as a good example of a building by Burgess, and for its ecclesiastical associations.
- 1.96 The receptor is of **Medium** value.

**Faith House (grade II)**

- 1.97 Faith House was added to the statutory list in 1987, and comprises an institute and offices built in 1907 by Sir Edwin Lutyens, as the St John Institute.
- 1.98 The building has a dark brown brick exterior, with stone dressings and a pantile roof over two storeys.
- 1.99 The building possesses historic and architectural interest as a good example of a building by Lutyens, and for its association with the St John Institute.
- 1.100 The receptor is of **Medium** value.
- Contribution of setting to heritage value*
- 1.101 The setting of these receptors is predominantly contained within the Smith Square Conservation Area, which is of a broadly uniform scale and period of development and makes a positive contribution to the heritage value of each of its contained receptors.
- 1.102 The Application Site makes a very limited contribution to the setting of the receptors; there is some visibility towards Victoria Tower Gardens east along Dean Stanley Street, though the listed buildings are best appreciated by views west from this perspective.
- 1.103 There are no historical or other associations between the listed buildings and the Site, and therefore any incidental intervisibility does not meaningfully contribute to the heritage value or appreciation of the receptors.
- 1.104 Therefore, these receptors have been scoped out of further assessment.

**Environs of Great Smith Street and Marsham Street**

- 1.105 A number of listed buildings are situated further from the river, to the west of the Site, from which they are separated by the governmental and other office buildings along Millbank, and considerable development within the Smith Square Conservation Area, and Westminster World Heritage Site.

**Ninth Church of Christ Scientist (grade II\*)**

- 1.106 The Ninth Church of Christ Scientist was added to the statutory list in 1978, and is of historic and architectural interest as a Christian Science Church and Sunday School built by Sir Herbert Baker between 1926-1930.
- 1.107 The receptor is of **Medium** value.
- Millicent Fawcett Hall (grade II)**
- 1.108 Millicent Fawcett Hall was added to the statutory list in 1992, and is of historic and architectural interest as 1920s conference hall, library and restaurant for the London & National Society for Women's Suffrage, designed by Douglas Wood.
- 1.109 The receptor is of **Medium** value.
- Mary Sumner House (grade II)**
- 1.110 Mary Sumner House was added to the statutory list in 2000, and possesses historic and architectural interest as the Headquarters of the Mothers' Union, built in 1925 by Claude W Ferrier, FRIBA.
- 1.111 The receptor is of **Medium** value.
- Orchard House (grade II)**
- 1.112 Orchard House was added to the statutory list in 1986. It possesses historic and architectural interest as a modelled terracotta commercial building, constructed in 1898 to designs by WJ Neatby Birch.
- 1.113 The receptor is of **Medium** value.
- Park House (grade II)**
- 1.114 Park House was added to the statutory list in 1986. It is a five storey mansion block in red brick with pink terracotta, built in 1904. It possesses historic and architectural interest as a good example of an early 20th century block of mansion flats.
- 1.115 The receptor is of **Medium** value.

**Church House (grade II)**

- 1.116 Church House was added to the statutory list in 1988, and is an Assembly Hall, chapel and offices built by Sir Herbert Baker and AT Scott for the Church of England in the 1930s. The building possesses historic and architectural interest as a good example of a purpose built Church of England building by a known architect.
- 1.117 The receptor is of **Medium** value.
- 36-40, Great Smith Street (grade II)**
- 1.118 36-40 Great Smith Street was added to the statutory list in 1958. The building comprises a terrace of three houses built circa 1725, of three storeys in stucco and red/ brown brick. The terrace possesses historic and architectural interest as a good surviving example of a terrace of houses in this part of Westminster.
- 1.119 The receptor is of **Medium** value.
- Westminster Public Library (grade II)**
- 1.120 Westminster Public Library was added to the statutory list in 1996. It was built in 1893 by Francis JR Smith, in red brick with stone dressings and is adorned with sculptures by Henry Poole and Son. The building possesses historic and architectural interest as a good example of a late 19th century public library, and for the quality of its sculpted work.
- 1.121 The receptor is of **Medium** value.
- Church of St Matthew (grade II)**
- 1.122 The Church of St Matthew was added to the statutory list in 1958. The Church was built between 1849-1851 by Sir George Gilbert Scott in a 13th century style with an imposing south tower and aisles flanking a nave. The building possesses historic and architectural interest as a good example of a 19th century church by a recognised architect.
- 1.123 The receptor is of **Medium** value.

<p>1.124 <i>St Matthew's Clergy House (grade II)</i> St Matthew's Clergy House was added to the statutory list in 1987. It was built circa 1905 in red brick and a restrained Arts &amp; Crafts style. The building possesses historic and architectural interest as a good example of an early 20th century clergy house.</p>	<p>1.136 <i>No. 32 and gate piers between Bennett House and Edric House, Grosvenor Estate (grade II)</i> This receptor was added to the statutory list in 1970, and comprises a former housing estate lodge, now a shop, with gate piers, built between 1928 and 1930 with consultation from Sir Edwin Lutyens.</p>	<p>1.149 The building possesses historic and architectural interest for its Queen Anne features and its historic association with Lutyens.</p>
<p>1.125 The receptor is of <b>Medium</b> value.</p>	<p>1.137 The building possesses historic and architectural interest for its neo-Georgian style and its historic association with Lutyens.</p>	<p>1.150 The value of this receptor is <b>Medium</b>.</p>
<p><i>Number 90 including railings (grade II)</i> 1.126 The building was added to the statutory list in 1994, and comprises a late 1820s terraced house by local developer John Johnson.</p>	<p>1.138 The value of this receptor is <b>Medium</b>.</p> <p><i>Bennett House, Grosvenor Estate (with Lodge and gate piers) (grade II)</i> 1.139 Bennett House was added to the statutory list in 1970, and comprises a tenement courtyard block of flats built between 1928 and 1930 with consultation from Sir Edwin Lutyens.</p>	<p><i>Contribution of setting to heritage value</i> 1.151 These receptors are situated to the south of Horseferry Road, and form part of a planned ensemble of early 20th century residential development. Collectively, the buildings contribute to one another's settings, and the dense built form in their environs contributes to the visitor's understanding of the city centre location.</p>
<p><i>Contribution of setting to heritage value</i> 1.127 The setting of the receptors is defined by the linear route of the</p>	<p>1.140 The building possesses historic and architectural interest for its stripped Georgian style and its historic association with Lutyens.</p>	<p>1.152 The Application Site does not meaningfully contribute to the setting of these receptors.</p>
<p>1.128 Existing interposing development prevents any intervisibility between the Site and these receptors, and there are no other historical or other associative relationships between the receptors and the Site, which makes no contribution to their setting.</p>	<p>1.141 The value of this receptor is <b>Medium</b>.</p> <p><i>Number 83 and gate piers between Rogers House and Tothill House (grade II)</i> 1.142 This receptor was added to the statutory list in 1970, and comprises a former housing estate lodge, now a shop, with gate piers, built between 1928 and 1930 with consultation from Sir Edwin Lutyens.</p>	<p><i>Millbank Tower (grade II)</i> 1.153 Millbank Tower was added to the statutory list in 1995, and comprises a tower office building constructed by Roland Ward and Partners in 1959-1963, as the Vickers Tower. The building has 32 storeys, and was briefly the tallest building in London. It has a reinforced concrete frame with glass curtain walling and stainless steel mullions.</p>
<p>1.129 The receptors are therefore scoped out of further assessment.</p> <p><i>South of Horseferry Road</i> <i>Number 34 and gate piers at entrance to Edric House, Grosvenor Estate (grade II)</i> 1.130 This receptor was added to the statutory list in 1970, and comprises a former lodge, now a shop, with gate piers, built between 1928 and 1930 with consultation from Sir Edwin Lutyens.</p>	<p>1.143 The building possesses historic and architectural interest for its neo-Georgian style and its historic association with Lutyens.</p>	<p>1.154 The building possesses historic and architectural interest as an elegant tower with a distinctive form, and as one of the earliest tall buildings in London.</p>
<p>1.131 The building possesses historic and architectural interest for its neo-Georgian style and its historic association with Lutyens.</p>	<p>1.144 The value of this receptor is <b>Medium</b>.</p> <p><i>Rogers House (grade II)</i> 1.145 Rogers House was added to the statutory list in 1970, and comprises a tenement courtyard block of flats built between 1928 and 1930 with consultation from Sir Edwin Lutyens.</p>	<p>1.155 The value of this receptor is <b>Medium</b>.</p> <p><i>Knife Edge two piece sculpture (grade II*)</i> 1.156 The Knife Edge two piece sculpture was added to the statutory list in 2016.</p>
<p>1.132 The value of this receptor is <b>Medium</b>.</p> <p><i>Edric House (grade II)</i> 1.133 Edric House was added to the statutory list in 1970, and comprises a tenement courtyard block of flats built between 1928 and 1930 with consultation from Sir Edwin Lutyens.</p>	<p>1.146 The building possesses historic and architectural interest for its stripped Georgian style and its historic association with Lutyens.</p>	<p>1.157 The sculpture was created between 1962 and 1964 and erected in 1967, by Henry Moore. It comprises a bronze work of interlocking forms, created by one of the most influential sculptors of the 20th century. It sits upon a concrete, granite faced pedestal, and was created as a substantial gift to the nation from the Contemporary Art Society, and Moore himself.</p>
<p>1.134 The building possesses historic and architectural interest for its stripped Georgian style and its historic association with Lutyens.</p>	<p>1.147 The value of this receptor is <b>Medium</b>.</p> <p><i>Morland House, Millbank Estate (grade II)</i> 1.148 Rogers House was added to the statutory list in 1970, and comprises a tenement courtyard block of flats built between 1928 and 1930 with consultation from Sir Edwin Lutyens.</p>	<p>1.158 The sculpture possesses historic and architectural (design) interest as a work by a sculptor of note, and aesthetic value for its contribution to the street scene.</p>
<p>1.135 The value of this receptor is <b>Medium</b>.</p>		<p>1.159 The value of this receptor is <b>High</b>.</p>

- Monument to Christopher Cass the Elder on East side of St John's Gardens (grade II)*
- 1.160 This receptor was added to the statutory list in 1993, and comprises a monument to Christopher Cass the Elder, a mason. It was probably designed by Cass himself, and is said to be the earliest granite monument in England.
- 1.161 The receptor possesses historic and architectural interest as a good and very early example of a granite monument to a notable figure.
- 1.162 The value of this receptor is **Medium**.
- Thames House (north and south blocks with bridge link) (grade II)*
- 1.163 Thames House was added to the statutory list in 1981, and comprises two blocks of office accommodation with a link bridge between. The building was constructed in 1928 to designs by Sir F Banes, and has five storeys with a three storey attic and entablature to the first floor.
- 1.164 The building possesses historic and architectural interest as a good example of a 1920s office block by a known architect, which has some group value with Norwest House.
- 1.165 The value of this receptor is **Medium**.
- Contribution of setting to heritage value*
- 1.166 These receptors are situated in the environs of Millbank and Abingdon Street, and their setting comprises the range of office buildings along Millbank, the open space of the road, Victoria Tower Gardens North and South, and the River Thames, which affords wide ranging views of built form on the opposite bank. The Knife Edge Two Piece Sculpture has an immediate setting defined by the open space at Abingdon Street Gardens, which contributes to its appreciation.
- 1.167 Lambeth Bridge forms a dividing feature in the receptor's setting, and separates this part of Millbank from the Victoria Tower Gardens (north) and core of civic Westminster to the north.
- 1.168 The leafy character of the Victoria Tower Gardens makes a positive contribution to the receptor's setting.
- Listed Buildings in the London Borough of Lambeth**
- St Thomas' Hospital**
- Statue of Robert Clayton at North Entrance to Ward Block of North Wing at St Thomas' Hospital (grade I)*
- 1.169 The statue was designated in 1979. It was created by Grinling Gibbons in 1714, with a Latin inscription on the plinth describing Clayton's role as President and benefactor at the hospital. The statue was moved to its current position along Lambeth Palace Road circa 1870. It possesses historic and architectural (design) interest as a notable work by Gibbons, and for its association with Robert Clayton.
- 1.170 The value of this receptor is **High**.
- Bronze statue of Edward VI at north entrance to ward block of north wing at St Thomas' Hospital (grade II\*)*
- 1.171 This statue was designated in 1979, and cast by Scheemakers in 1736. It features a figure in period costume on a tall plinth, and was erected at St Thomas' in 1870. It possesses historic and architectural (design) value as a well-preserved bronze work by Scheemakers.
- 1.172 The value of this receptor is **High**.
- Block 9 of St Thomas' Hospital Medical School (grade II)*
- 1.173 Block 9 of St Thomas' Hospital Medical School was added to the statutory list in 1979, and comprises an Italianate style two storey building dating from circa 1870, built by Henry Currey. It has a red brick exterior with Portland stone quoins, and a tower with deep windows.
- 1.174 The building possesses historic and architectural interest as a good example of an 1870s medical school building, and as part of the historic St Thomas' Hospital complex.
- 1.175 The value of this receptor is **Medium**.
- Fifteen Public Benches on Embankment footpath between Lambeth Bridge and Westminster Bridge (grade II)*
- 1.176 The fifteen public benches were added to the statutory list in 1981, and comprise a set of 19th century benches, with a cast iron centre and end supports, and ornamental open-work panels and arms in the shape of swans.
- 1.177 The benches possess historic and architectural (design) interest as part of the 19th century street furniture in the locality, and as well-designed public seating which makes a positive contribution to the street scene.
- 1.178 The value of this receptor is **Medium**.
- Wall along western boundary of St Thomas' Hospital (grade II)*
- 1.179 The wall was added to the statutory list in 1981, and comprises a mid to late 19th century Portland stone wall with a high roll-moulded plinth, flat buttresses and a cornice.
- 1.180 It possesses historic and architectural (design) interest as part of the historic St Thomas' Hospital complex, and as an attractive boundary treatment which makes a positive contribution to the street scene.
- 1.181 The value of this receptor is **Medium**.
- South wing at St Thomas' Hospital excluding post-1926 courtyard infill buildings (grade II)*
- 1.182 The South Wing was added to the statutory list in 1973, and comprises a red Fareham brick hospital building, constructed between 1868 and 1871 by Henry Currey, Architect and Surveyor to the Hospital, and later altered in the early 20th century.
- 1.183 The building possesses historic and architectural interest as the grandest of English pavilion- plan hospitals, deliberately designed to take advantage of its position on the south bank, opposite the Palace of Westminster. It also derives some special interest from its group value with the former Medical School.
- 1.184 The value of this receptor is **Medium**.
- K6 telephone Kiosk, Lambeth Palace Road/ Albert Embankment (grade II)*
- 1.185 This K6 kiosk was added to the statutory list in 1987, and conforms to a type designed by Giles Gilbert Scott in 1935. It is built in cast iron, in square form with a domed roof and unperforated crowns to the top panels.
- 1.186 The kiosk possesses historic and architectural (design) interest as a kiosk conforming to a recognised type by Scott, and as an attractive part of the street furniture in the locality.
- 1.187 The value of this receptor is **Medium**.

- Contribution of setting to heritage value*
- 1.188 This group of receptors is situated on the 'south' bank of the river, to the east of the Site. Their setting primarily comprises the tree-lined river embankment, and the open space of the Thames to the east, which provides an open vista towards the western bank and the wider skyline. The Palace of Westminster is a prominent feature in the setting of the receptors, and the benches in particular are arranged to afford views towards the landmark buildings.
- 1.189 This setting makes a positive contribution to the receptors and their appreciation as part of the city centre streetscene.
- Lambeth Palace**
- 1.190 Lambeth Bridge and associated parapets, light standards, associated to approaches and obelisks (grade II)
- Lambeth Palace (grade I)*
- 1.191 Lambeth Palace and its gardens are situated on the south bank of the River Thames, approximately 350m east of the Application Site at nearest extent.
- 1.192 Lambeth Palace has medieval origins, the oldest part being the undercroft to the 15th century chapel situated to the north of the Great Hall. The Palace includes a group of historic ecclesiastical and residential buildings dating from various periods between the 14th and 19th centuries.
- 1.193 The earliest records of the site, which date from 1090, describe a manor in the possession of the monks of Rochester Cathedral Priory. Due to its proximity to Westminster, the house was customarily used as accommodation for visiting archbishops, before passing into the ownership of the Archbishopric of Canterbury in 1197.
- 1.194 The Palace has considerable architectural and historic interest owing to its age, built form and associations with the monarchy and Archbishopric of Canterbury.
- Church of St Mary (grade II\*)**
- 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 (grade II\*)*
- Wall to the west of the Great Hall at Lambeth (grade II)*
- 1.195 The wall was designated in 1981 and dates to the C19, built in red brick with blue diaper and plain stone coping. It separates Lambeth Palace Road to the west from the private space within the palace complex to the west.
- 1.196 The wall has historical interest as the boundary of the Lambeth Palace complex, and historical interest due to its age.
- 1.197 The value of this receptor is **Medium**.
- Lambeth Palace Cottages Wall to East of Lambeth Palace Courtyard (grade II)*
- 1.198 The wall was designated in 1981 and consists of a stone-coped battlemented stock brick wall of circa 1835 date. To the east of the wall is a U shaped two storey stock brick cottage row, with welsh slate roofs accessed through ornamental iron gates. The buildings were rebuilt after war damage, but maintain their architectural value.
- 1.199 The value of this receptor is **Medium**.
- Wall on south side of main Courtyard at Lambeth Palace (grade II)*
- 1.200 The wall was designated grade II in March 1981, and dates to the early to mid-C19, and has an archway between St Mary's Churchyard and Lambeth Palace.
- 1.201 The wall's special interest is derived from its historic and architectural interest as a battlemented stock brick wall, and its function interposing the two.
- 1.202 The value of this receptor is **Medium**.
- Mounting block to east of entrance to Lambeth Palace Residential Apartments (grade II)*
- 1.203 The Mounting Block was designated in March 1981 and forms part of the Lambeth Palace complex. It dates to circa 1835 and forms a Portland stone three-step mounting block with gothic ornament.
- 1.204 The mounting block has historical and architectural interest as part of the Lambeth Palace complex and as a mounting block dating to the mid-C19.
- 1.205 The value of this receptor is **Medium**.
- Walls, Railings, Gates and Gate Piers to South and West of Church of St Mary (grade II)*
- 1.206 The walls were designated in 1981, and form a mid-C19 low rubble wall with ornate wrought iron railings and gates.
- 1.207 The walls, gates and gate piers derive their special interest through their association with the Church of St Mary, and historical function demarcating its boundaries.
- 1.208 The value of this receptor is **Medium**.
- Contribution of setting to heritage value*
- 1.209 These receptors are situated on the south bank of the river, to the east of the Application Site, to the west of Lambeth Palace Road. Lambeth Palace forms the centrepiece of the ensemble, set within its defined walls, and the collection of the buildings form part of the site's history as the seat of the Archbishopric of Canterbury.
- 1.210 The receptors' primary setting is defined by the perimeter wall on the west side of Lambeth Palace Road, which is a busy traffic thoroughfare to the east. Lambeth Bridge, to the north east, is a notable feature, and makes a positive contribution to their setting, as does the open space of the Thames. To the north is more modern development,
- 1.211 The contained immediate setting, busy interchange and regular dense trees along the south bank define the setting of the receptors. On the opposing bank, the Palace of Westminster is an important associated feature, by virtue of the historic relationship between the church and state.
- 1.212 The Application Site does not make any meaningful contribution to the setting of the receptors, or their appreciation.

### Scheduled Monuments

#### The Chapter House and Pyx Chamber in the abbey cloisters, Westminster Abbey

- 1.213 The Chapter House and Pyx Chamber formed part of the Benedictine Abbey of Westminster and are also designated as a scheduled monument.
- 1.214 The Chapter House, Pyx Chamber and other precinct buildings are an integral part of Westminster Abbey, a building of outstanding architectural and historic significance. The Chapter House, constructed by Henry III, has been recognised as the greatest single act of royal patronage in English medieval history and one of the finest pieces of C13 century architecture with one of the finest medieval tile pavements in England.
- 1.215 Despite later alterations, the Chapter House, together with the Outer and Inner Vestibules, retains a high proportion of original masonry fabric. It was carefully restored, by Sir George Gilbert Scott, one of the best-known and most prolific Victorian architects. The Pyx Chamber, as part of the C11 undercroft of the monk's dormitory, contains some of the oldest surviving fabric in Westminster Abbey. The site will also contain archaeological remains relating to the medieval construction, use and history of the Abbey.
- 1.216 The value of this receptor is **High**.
- Contribution of setting to heritage value*
- 1.217 The setting of the receptor is contained within the Westminster Abbey complex, which makes a positive contribution to its heritage value and appreciation.
- 1.218 The Application Site does not form part of the setting of the receptor, or contribute to its appreciation.

### The Jewel Tower

- 1.219 The Jewel House forms an isolated part of the medieval palace of Westminster. It was built in 1365-66 by Henry Yevele for Edward III as a repository for the King's personal treasure. It is one of only four surviving buildings of the medieval palace of Westminster, with Westminster Hall, St Stephen's Cloister and the Chapel of St Mary Undercroft beneath St Stephen's Hall, and the only surviving part of the Privy Palace.
- 1.220 It is built in squared ragstone with Portland stone window dressings and some ashlar to lower parts, in an L shaped plan form with a north polygonal stair turret.
- 1.221 Despite some later alterations, the Jewel Tower survives remarkably well. As a purpose-built strong-room it is a rare example of its type and includes some extremely fine C14 vaulting and masonry work. It is of exceptional historical interest as part of Westminster Palace, the principal seat of the monarchy and the permanent seat of government for almost five hundred years. As a design by the royal mason Henry Yevele, a key figure in the development of English Perpendicular Architecture, it is of major architectural interest.
- 1.222 Following excavations in the 1960s, part of the moat has been reconstructed, which makes a positive contribution to the setting of the tower.
- 1.223 The value of this receptor is **High**.
- Contribution of setting to heritage value*
- 1.224 The setting of the Jewel House is contained predominantly within the wider complex of the Westminster World Heritage Site, which makes a positive contribution to its heritage value and appreciation.
- 1.225 The receptor has a confined setting within the World Heritage Site, screened from the Application Site by dense vegetation along the west of the Black Rod Gardens, the busy thoroughfare of Abingdon Street, and the to the confined nature of the setting of the tower, and the Palace of Westminster.
- 1.226 The Application Site does not meaningfully contribute to the setting of the receptor, which is thus scoped out of further assessment.



// NATIONAL HOLOCAUST MEMORIAL



APPENDIX 2: Hayes Davidson Methodology

# Holocaust Memorial

Hayes Davidson Methodology

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December 2018

**HayesDavidson**

### Qualifications

- 1.0 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.
- 1.1 Hayes Davidson was founded by Alan Davidson, who has a BA and MA (Hons.) in Architecture from the University of Edinburgh and is an ARCUK registered architect. He studied Fine Art and attended Art College in Edinburgh. He has worked as an architect since 1986 and as an architectural illustrator since 1979. The studio also has several qualified architects who have strong knowledge of architectural practices and terms.
- 1.2 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.
- 1.3 The following reference for Hayes Davidson comes from Dr. Neil Bingham, Assistant Curator of the Royal Institute of British Architects Drawings Collection:  
*"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 20<sup>th</sup> Century."*
- 1.4 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.

### Work Commissioned

- 2.0 Hayes Davidson has been commissioned by Adjaye Associates.
- 2.1 All drawn and digital information regarding the proposed development has been supplied to Hayes Davidson in digital format by Adjaye Associates.
- 2.2 Hayes Davidson attended a series of meetings on site between July 2018 and November 2018 with a photographer and surveyor to establish the position of the views required.

### Choice of simulation technique and media employed

- 3.0 It is important to emphasise that no media can currently completely 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.
- 3.1 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. A 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.
- 3.2 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 scheme edges
  4. the viewer's 360° awareness of the surroundings
  5. position in view
  6. the effect of light on and the nature of the building's materials
  7. night lighting
  8. nature of surrounding buildings/structures (shadowing and reflection)
- 3.3 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 therefore the architect and Hayes Davidson work together to apply subjective judgement.

### Photography

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

Summer Views

Camera: 45+/Arca Swiss RL3D

Lens: Rodenstock 32HR-W

Winter Views

Camera: Arca Swiss 69 F-Line Metric

Lens: Rodenstock 32 mm, high-resolution, digital lens

View 44

Camera: SONY A7R2

Lens: Canon 24 TS-E

The images were processed by the photographer to achieve results that best reflected the experience of each scene at the time of capture.

4.1 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.

4.2 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 40° 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 40° 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 70°), as this can add peripheral information that more closely reflects our 'experience' of a scene.

4.3 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.

4.4 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

# Holocaust Memorial

## Hayes Davidson Methodology

### Surveying

- 5.0 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.
- 5.1 A line of sight, two station baseline is established, coordinated and levelled utilising GPS observations.
- 5.2 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 therefore 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.
- 5.3 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.
- 5.4 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.
- 5.5 Surveying equipment used:  
GPS - Leica Viva GS14  
  
GNSS System - Leica Nova TS50 Total Station with a 0.5" angle measuring accuracy and 2mm and 2ppm distance measuring accuracy
- 5.6 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



fig 3c Trimble 5600 Reflectorless Total Station

HayesDavidson Accurate Visual Representation - surveyed viewpoints					
Project name:	Poplar Business Park			Date:	02/05/2010
Job reference:	WG001			View reference:	View 3
OS Grid co-ordinates					
	Reference	Easting	Northing	Elevation	Accuracy (A-D)
Camera Position	L3	538369.211	180363.220	5.434	A
Surveyor viewpoint1	SV1	538250.536	180431.204	23.796	A
Surveyor viewpoint2	SV2	538222.242	180497.941	18.624	A
Surveyor viewpoint3	SV3	538238.276	180497.432	23.822	A
Surveyor viewpoint4	SV4	537838.268	181044.153	62.131	A
Surveyor viewpoint5	SV5	537981.825	181023.878	55.818	D
Surveyor viewpoint6	SV6	538063.733	180940.239	54.953	A
Surveyor viewpoint7	SV7	538209.542	180728.334	27.670	A
Surveyor viewpoint8	SV8	538266.412	180672.075	73.630	A
Surveyor viewpoint9	SV9	538364.933	180372.964	5.325	A
Surveyor viewpoint10	SV10	538367.095	180393.236	5.435	A
Surveyor viewpoint11	SV11	538395.996	180510.867	12.527	A
Surveyor viewpoint12	SV12	538374.180	180380.060	5.576	A
Surveyor viewpoint13	SV13	537852.072	181047.347	62.174	A
Surveyor viewpoint14	SV14	538253.487	180648.421	76.588	A
Surveyor viewpoint15	SV15	538269.285	180650.934	76.602	A
Surveyor viewpoint16	SV16	538266.358	180672.066	48.239	A
Surveyor viewpoint17	SV17	538263.602	180701.649	47.244	A

fig 3b Survey coordinates supplied as an Excel file

### Digital Images and Colour Correction

- 6.0 The digital images supplied by the photographer were saved as Photoshop PSD/TIFF/JPG files for use in the verification process.
- 6.1 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.
- 6.2 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).
- 6.3 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'.
- 6.4 Lens corrections help offset imperfections present in nearly every camera image. These might include darkening near the corners of the frame, otherwise straight lines appearing curved, or colour fringes near edge detail. Even though these often aren't obvious in the original photo, the benefits of their removal almost always are. Hayes Davidson has created bespoke lens correction profiles which are applied to each view to correct for this.
- 6.5 When taking photographs of a building or other large structure from the ground, it is often impossible (without shift) to fit the entire building in the frame without tilting the camera upwards. The resultant perspective causes the top of the building to appear smaller than its base, which is often considered undesirable. With a 'perspective control' or 'shift' lens, however, the camera can be kept level with the ground, and the lens may be shifted upwards in relation to the image area, placing more of the subject within the frame. The ground level, horizon, and the camera's point of perspective is then shifted towards the bottom of the frame, thus capturing the top of the building without the resultant perspective problems of simply tilting the camera. It is standard practice within architectural photography to use 'shift' as this more realistically reflects the viewer's experience on site.
- 6.6 Although 'virtual' cameras in proprietary 3D software do now have this 'shift-negative' feature, it is difficult to calculate and therefore apply. 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

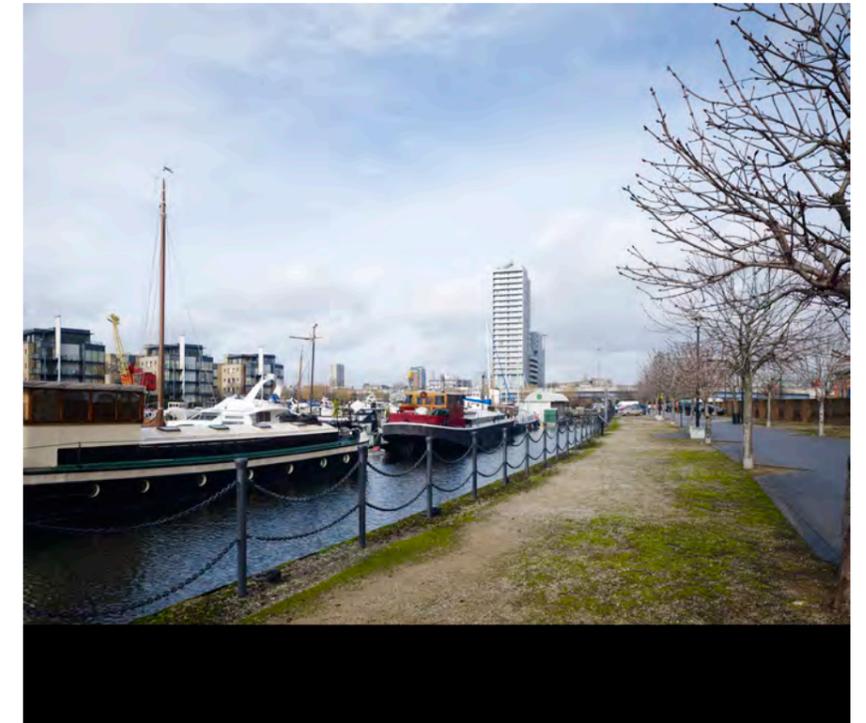


fig 4b High resolution image after colour correction. The image has been rotated and resized to ensure that the surveyed horizon line is level and bisects the vertical dimension equally

# Holocaust Memorial

## Hayes Davidson Methodology

### The 3D Model and View Verification Process

- 7.0 All drawn and digital information regarding the proposed development was supplied to Hayes Davidson in digital format by Adjaye Associates.
- 7.1 At each view position a virtual camera was set up in the 3D software 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.
- 7.2 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)
- 7.3 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.
- 7.4 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 wireframe 3D model placed into the scene

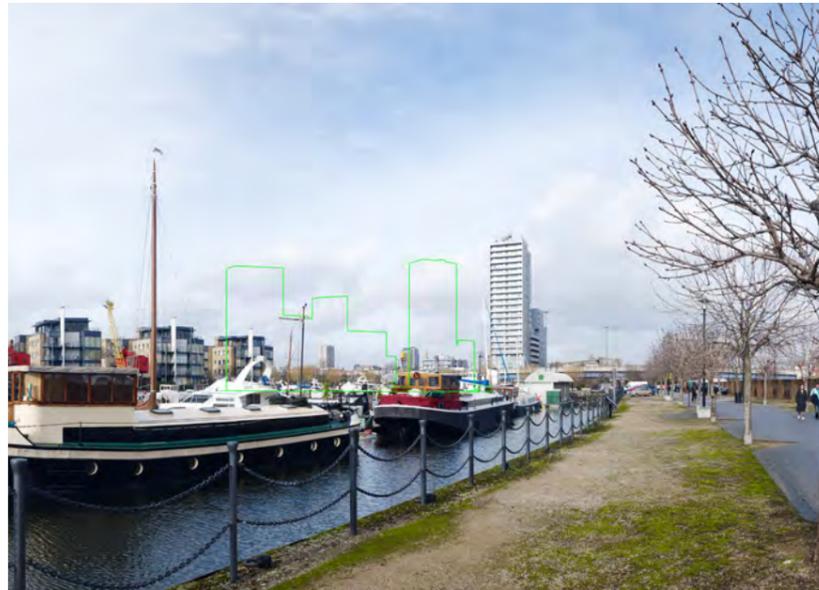


fig 5c The wireline image

### Image Production

- 8.0 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.
- 8.1 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.
- 8.2 The computer generated image of the proposals is combined with the background photography using proprietary digital compositing software.

### Notes

- 8.3 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.
- 8.4 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.
- 8.5 Hayes Davidson therefore turn to the scene for visual clues in order to set the render of the proposed development into the photograph.



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

# Holocaust Memorial

## Hayes Davidson Methodology – Technical Details

View No.	Location	Summer / Winter	Rendered / Wireline	Camera / Tripod height (m)	Single / Multipanel	Horizontal field of view (degrees)	Vertical field of view (degrees)	Lens used (mm)	Date	Time	Easting (m)	Northing (m)	Elevation (mAOD)	Eye Level (mAOD)	Bearing (degrees)	Distance from Scheme (m)
05	Westminster Bridge Upstream	Summer	Wireline	1.6	Multipanel	75	59.8	32	25/09/2018	09:48	530463.171	179650.109	10.52	12.12	200.505	518.673
08	Westminster Bridge Upstream	Summer	Wireline	1.6	Multipanel	75	59.8	32	25/09/2018	10:03	530591.99	179640.815	8.559	10.159	219.73	570.715
09	Albert Embankment opposite the Palace of Westminster	Summer	Wireline	1.6	Multipanel	75	59.8	32	25/09/2018	10:17	530583.136	179602.042	4.497	6.097	220.322	533.888
10	Albert Embankment opposite the Palace of Westminster	Summer	Wireline	1.6	Multipanel	75	59.8	32	25/09/2018	10:37	530569.565	179456.805	4.531	6.131	123.7	415.066
11	River Thames	Summer	Rendered	1.6	Multipanel	75	59.8	32	21/09/2018	09:24	530552.574	179274.465	4.541	6.141	256.951	300.852
11	River Thames	Winter	Rendered	1.6	Multipanel	75	59.8	32	18/11/2018	08:03	530552.574	179274.465	4.541	6.141	283.319	300.853
12	Albert Embankment opposite the Palace of Westminster	Summer	Rendered	1.6	Multipanel	75	59.8	32	21/09/2018	09:40	530539.22	179144.218	4.575	6.175	275.063	273.812
12	Albert Embankment opposite the Palace of Westminster	Winter	Rendered	1.6	Multipanel	75	59.8	32	18/11/2018	08:47	530539.22	179144.218	4.575	6.175	276.043	272.427
16	Lambeth Bridge downstream	Summer	Wireline	1.6	Multipanel	75	59.8	32	18/09/2018	13:23	530509.628	178951.869	8.083	9.683	313.424	309.467
16	Lambeth Bridge downstream	Winter	Wireline	1.6	Multipanel	75	59.8	32	18/11/2018	12:06	530509.628	178951.869	8.083	9.683	313.714	309.543
17	Lambeth Bridge downstream (Day)	Summer	Rendered	1.6	Multipanel	75	59.8	32	19/09/2018	13:23	530382.32	178970.196	11.585	13.185	315.816	204.8
17	Lambeth Bridge downstream (Day)	Winter	Rendered	1.6	Multipanel	75	59.8	32	18/11/2018	12:30	530382.32	178970.196	11.585	13.185	316.656	205.967
17	Lambeth Bridge downstream (Night)	Summer	Rendered	1.6	Multipanel	75	59.8	32	07/10/2018	18:58	530382.32	178970.196	11.585	13.185	315.536	205.066
17	Lambeth Bridge downstream (Night)	Winter	Rendered	1.6	Multipanel	75	59.8	32	18/11/2018	16:51	530382.32	178970.196	11.585	13.185	315.296	204.807
19	TC4	Summer	Rendered	1.6	Single	75	59.8	32	21/09/2018	08:46	530275.118	178998.266	7.314	8.914	351.123	136.107
22	MI5	Summer	Wireline	1.6	Single	75	59.8	32	21/09/2018	11:58	530235.858	178949.98	6.346	7.946	7.605	183.875
23	Millbank towards North	Summer	Rendered	1.6	Single	75	59.8	32	21/09/2018	08:25	530256.955	179004.974	6.324	7.924	1.416	128.229
24	Horseferry Street	Summer	Rendered	1.6	Single	75	59.8	32	18/09/2018	14:00	530237.876	179018.948	5.642	7.242	30.477	115.128
26	Dean Stanley Street	Summer	Rendered	1.6	Single	75	59.8	32	21/09/2018	11:34	530217.18	179130.649	4.651	6.251	65.471	28.394
28	Great Peter Street	Summer	Rendered	1.6	Single	75	59.8	32	05/10/2018	12:24	530197.825	179233.319	4.11	5.71	139.286	77.555
29	Great College Street	Summer	Rendered	1.6	Single	75	59.8	32	21/09/2018	10:10	530191.481	179293.417	4.761	6.361	134.517	35.96
35	TC6A	Summer	Rendered	1.6	Single	75	59.8	32	04/10/2018	09:00	530289.682	179250.154	4.407	6.007	169.736	123.739
37	TC3B	Summer	Rendered	1.6	Single	75	59.8	32	04/10/2018	10:20	530289.682	179250.154	4.407	6.007	212.174	82.627
39	TC3A (Day)	Summer	Rendered	1.6	Single	75	59.8	32	05/10/2018	11:59	530282.05	179162.386	4.539	6.139	218.397	11.164
39	TC3A (Night)	Summer	Rendered	1.6	Single	75	59.8	32	12/10/2018	18:39	530282.05	179162.385	4.533	6.139	218.285	11.219
40	TC2 (Day)	Summer	Rendered	1.6	Single	75	58.8	32	05/10/2018	09:40	530238.673	179135.409	4.795	6.395	151.425	6.975

View No.	Location	Summer / Winter	Rendered / Wireline	Camera / Tripod height (m)	Single / Multi-panel	Horizontal field of view (degrees)	Vertical field of view (degrees)	Lens used (mm)	Date	Time	Easting (m)	Northing (m)	Elevation (mAOD)	Eye Level (mAOD)	Bearing (degrees)	Distance from Scheme (m)
40	TC2 (Night)	Summer	Rendered	1.6	Single	75	59.8	32	08/10/2018	18:50	530238.675	179135.408	4.796	6.396	151.547	7.07
41	TC6D	Summer	Rendered	1.6	Single	75	59.8	32	04/10/2018	11:43	530227.103	179205.61	4.605	6.205	152.264	9.319
42	TC6C	Summer	Rendered	1.6	Single	75	59.8	32	04/10/2018	13:17	530224.586	179249.538	4.49	5.79	158.732	23.136
43	Victoria Tower Gardens (Day)	Summer	Rendered	1.6	Single	75	59.8	32	05/10/2018	13:26	530260.439	179098.052	4.838	6.438	356.411	35.409
43	Victoria Tower Gardens (Night)	Summer	Rendered	1.6	Single	75	59.8	32	05/10/2018	19:02	530260.439	179098.052	4.838	6.438	356.41	35.692
44	Victoria Tower Gardens (Day)	Summer	Rendered	1.6	Single	75	59.8	32	05/10/2018	12:58	530260.441	179098.052	4.836	6.438	2.591	5.751
44	Victoria Tower Gardens (Night)	Summer	Rendered	1.6	Single	75	59.8	32	04/10/2018	18:06	530260.441	179098.052	4.836	6.438	2.041	6.724

**HayesDavidson**

