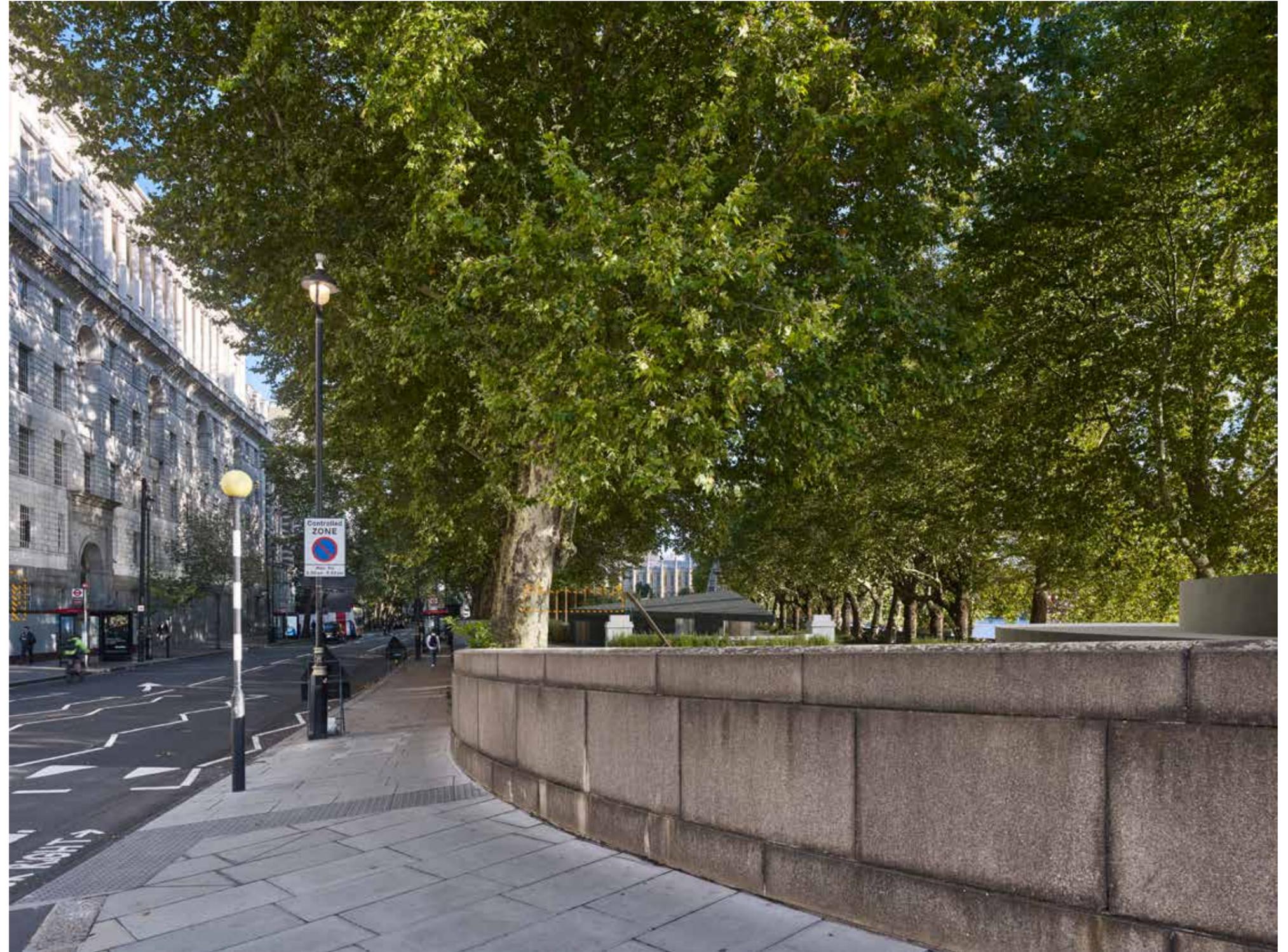


CUMULATIVE

3.37 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

- 3.38 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.
- 3.39 The foreground takes in an oblique view of the carriageway along Millbank, a busy thoroughfare with heavy traffic.
- 3.40 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.
- 3.41 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.
- 3.42 The value attached to the view is Low.
- 3.43 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

- 3.44 The roof profile of the entrance pavilion preserves views towards the polychromatic roof of the Buxton Memorial, which remains visible toward the centre, though as noted, this is an incidental view. The spaced vertical columns of the pavilion walls have a lightweight appearance, and contribute to a sense of permeability.
- 3.45 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 the elegant shape of the memorial would be an attractive addition to the middle of the view.
- 3.46 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.
- 3.47 The magnitude of impact would be Low.
- 3.48 The Proposed Development would give rise to a **Minor Adverse** effect to visual receptors. The effect would be direct, local and permanent.



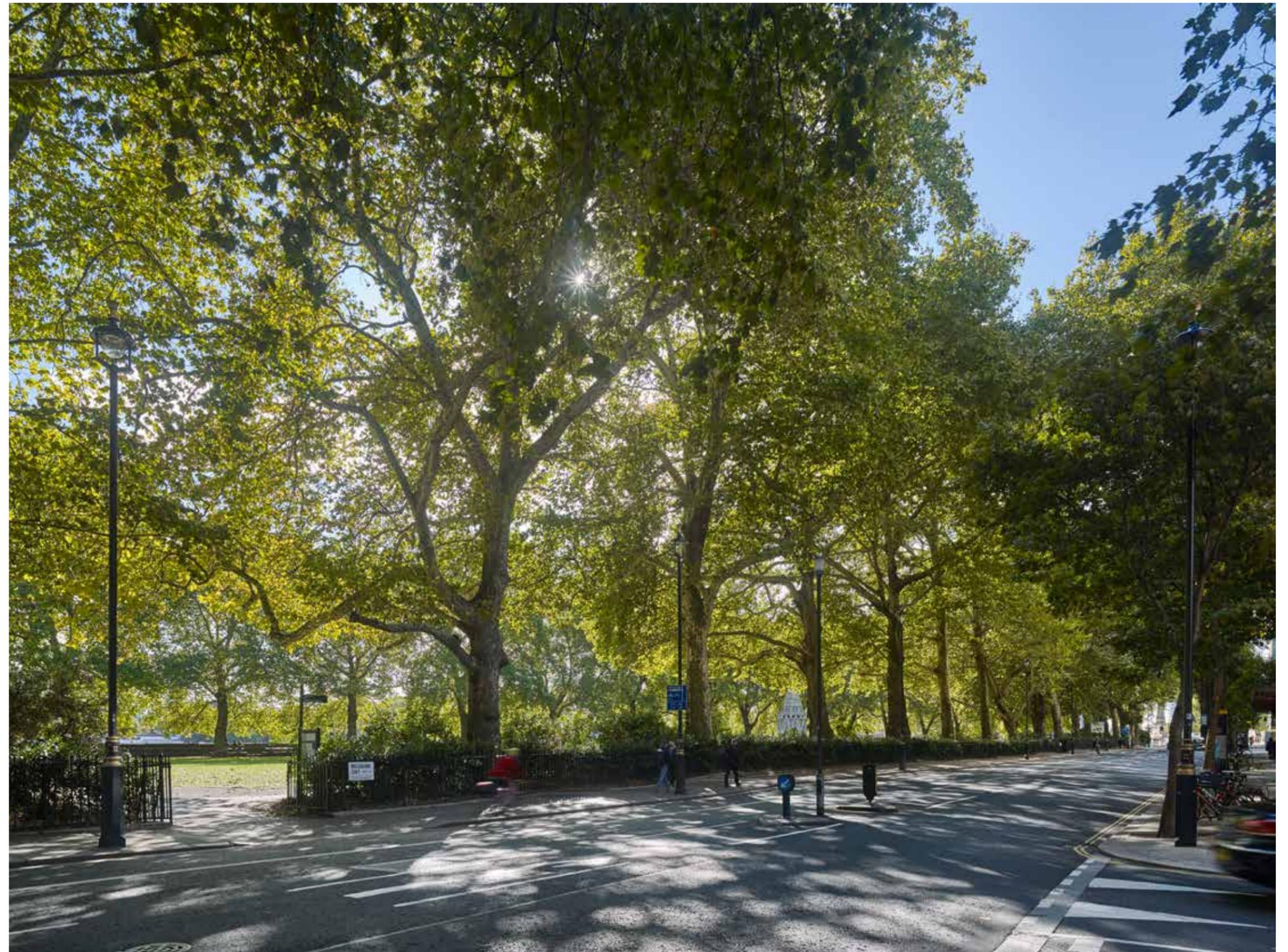
CUMULATIVE

3.49 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 15: GREAT COLLEGE STREET**EXISTING**

- 3.50 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.
- 3.51 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.
- 3.52 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.
- 3.53 The Buxton Memorial is a noticeable feature in the centre of the view, by virtue of its scale and materials.
- 3.54 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.
- 3.55 Whilst not within the frame, the viewer would be aware of the Westminster World Heritage Site buildings to their left.
- 3.56 The value attached to the view is Medium.
- 3.57 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 Low susceptibility to change and Low sensitivity.



PROPOSED

- 3.58 The Proposed Development would introduce a new element to the centre of the view.
- 3.59 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.
- 3.60 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.
- 3.61 The low form of the entrance pavilion would not be a prominent element in the view.
- 3.62 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.
- 3.63 The magnitude of impact would be Medium.
- 3.64 The Proposed Development would give rise to a **Minor Beneficial** effect to visual receptors. The effect would be direct, local and permanent.



CUMULATIVE

3.65 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 17: TC3B

EXISTING

- 3.66 This viewpoint is situated on the east side of the Victoria Tower Gardens, oriented south west towards the Application Site.
- 3.67 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.
- 3.68 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.
- 3.69 The value attached to the view is Medium.
- 3.70 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.
- 3.71 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

- 3.72 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.
- 3.73 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.
- 3.74 The low form of the entrance pavilion would be subservient to the bronze fins of the memorial, and the Buxton Memorial adjacent. As at present, however, the Buxton Memorial would not be the focus of the view.
- 3.75 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.
- 3.76 The magnitude of impact would be Medium.
- 3.77 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

3.78 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 DAY TIME

- 3.79 The viewpoint is situated on the west side of the Victoria Tower Gardens, oriented south east, towards the Application Site and the Buxton Memorial.
- 3.80 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 forms a transitional area.
- 3.81 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.
- 3.82 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.
- 3.83 The value attached to the view is Medium.
- 3.84 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.
- 3.85 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

- 3.86 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.
- 3.87 Traffic moving along the road would also become more prominent by virtue of its illumination.
- 3.88 We note that the park is closed for some night time hours, and thus appreciation of the view would be limited.



PROPOSED DAY TIME

- 3.89 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.
- 3.90 The interesting, angular form of the bronze fins would frame the new mound created in the landscape, and create interest in the middle ground of the view, and a sense of depth would be understood from the spacing of its bronze fins. The entrance pavilion and play area, whilst partially visible, would not feature prominently in the view.
- 3.91 The scale responds to the neighbouring context, and the tallest fins remain below the line of the Buxton Memorial, which preserves its prominence. The hard and soft landscaping scheme includes a low boundary fence comprised of spaced vertical columns, responding to the materiality and form of the entrance pavilion, and forming an unobtrusive boundary which allows for the continued appreciation of the Buxton Memorial, as well as views across the courtyard space.
- 3.92 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.
- 3.93 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.
- 3.94 The magnitude of impact would be Medium.
- 3.95 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

- 3.96 The illumination of the Proposed Development would create interest within the park at night time, creating a focus within the park.
- 3.97 The illuminated markers along the pathways would facilitate movement through the park during hours of darkness.
- 3.98 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.
- 3.99 The effect would remain **Moderate Beneficial**.



CUMULATIVE

3.100 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

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



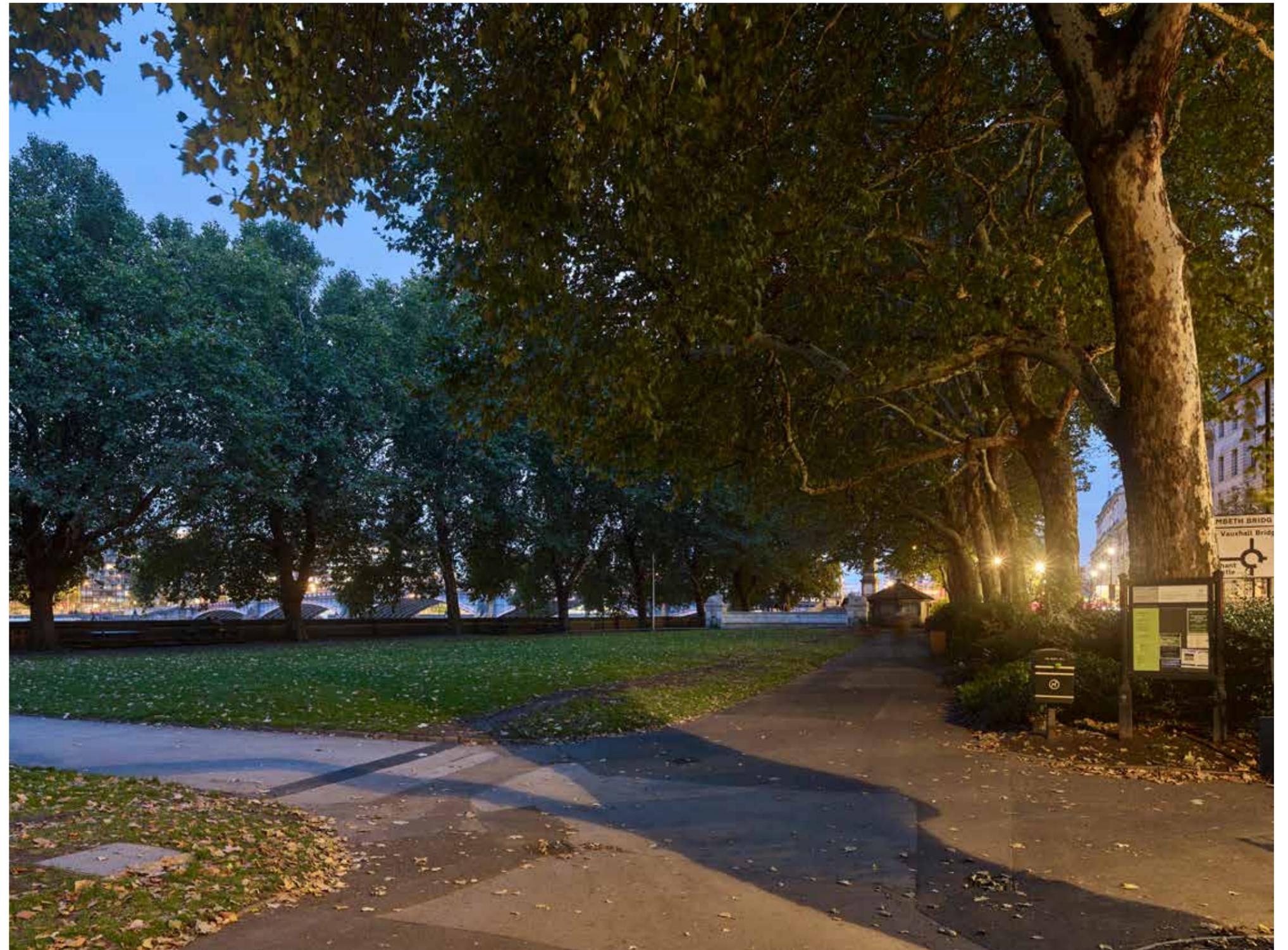
VIEW 19: VICTORIA TOWER GARDENS**EXISTING DAY TIME**

- 3.102 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.
- 3.103 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.
- 3.104 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, framing the extent of the park.
- 3.105 The space within the parks is framed by mature plane trees at regular intervals, and the view along the path is terminated by a refreshment hut.
- 3.106 The viewer would be aware of the busy vehicular route along Millbank to the right hand side of the frame.
- 3.107 The value attached to the view is Low.
- 3.108 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 receptors have a Medium susceptibility to change.
- 3.109 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.



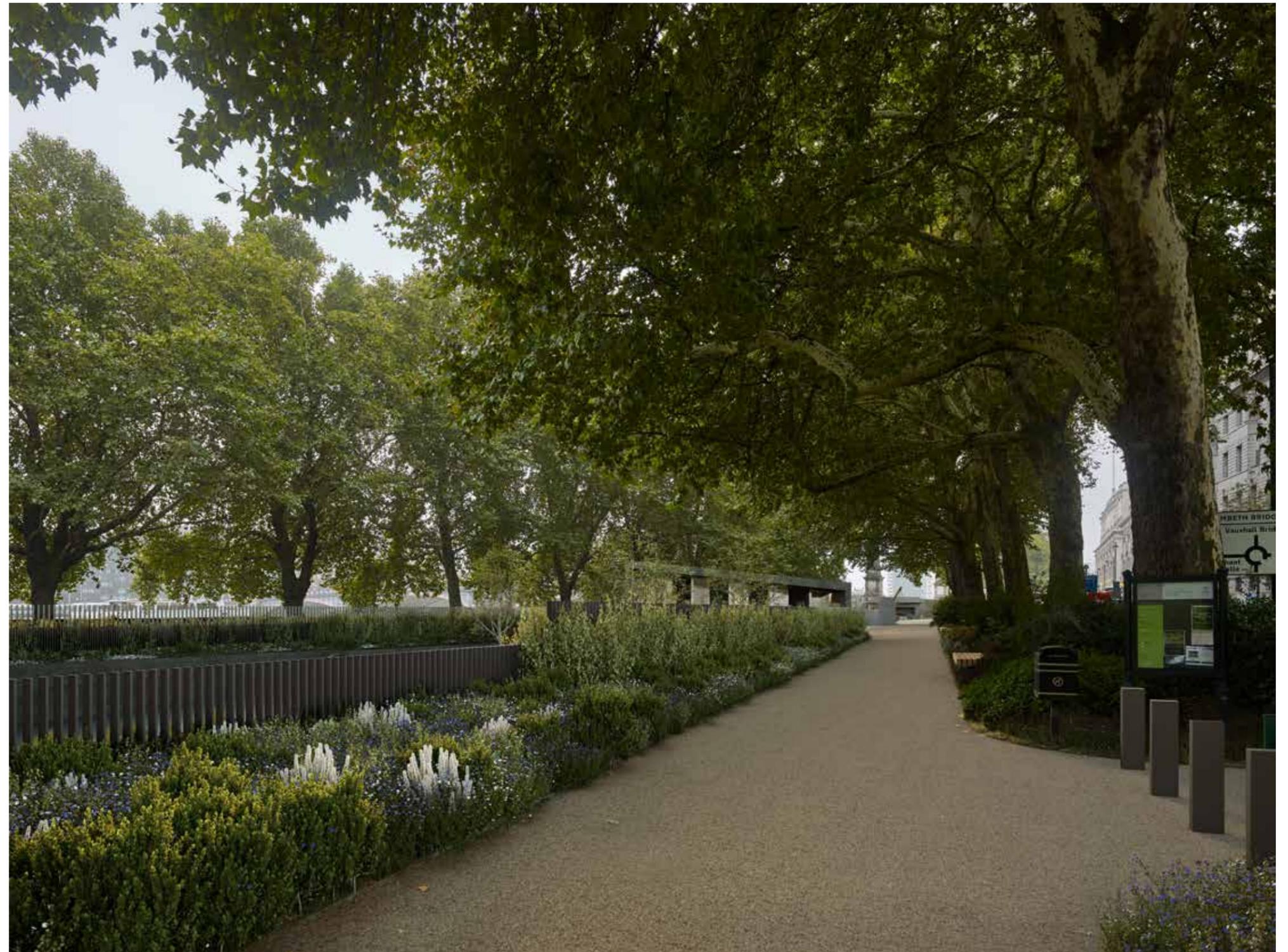
EXISTING NIGHT TIME

- 3.110 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.
- 3.111 Lambeth Bridge, in the background of the view, is a more prominent feature due to its lighting, and draws the viewer's eye.
- 3.112 The value of the view remains the same.



PROPOSED DAY TIME

- 3.113 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.
- 3.114 The courtyard of the memorial can be seen through the permeable boundary treatment, comprising a low boundary fence with spaced vertical columns. This responds to the materiality and form of the entrance pavilion towards the rear of the view, and forms an unobtrusive boundary which allows views across the courtyard space towards Lambeth Bridge and the River.
- 3.115 The entrance pavilion remains subservient to the surrounding trees by virtue of its scale and lightweight materiality. The sculptural form and angled roof preserve the view towards the steps at Lambeth Bridge, in the rear of the park, and ease any sense of congestion in the background of the view.
- 3.116 The obelisk at Lambeth Bridge, and the Spicer Memorial, remain visible in the background of the view.
- 3.117 The magnitude of impact would be Medium.
- 3.118 The Proposed Development would give rise to a **Minor Adverse** effect to visual receptors. The effect would be direct, local and permanent.



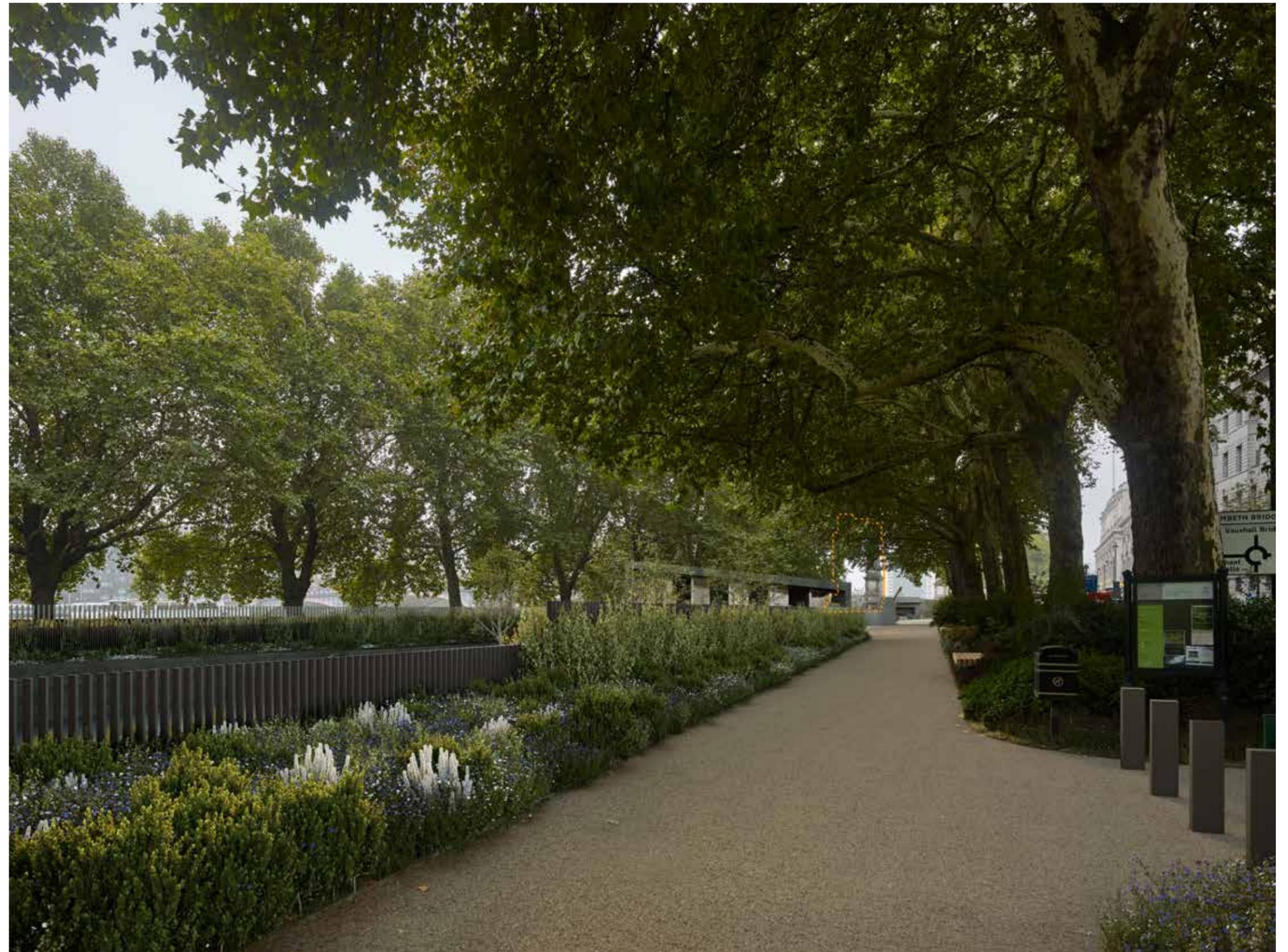
PROPOSED NIGHT TIME

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



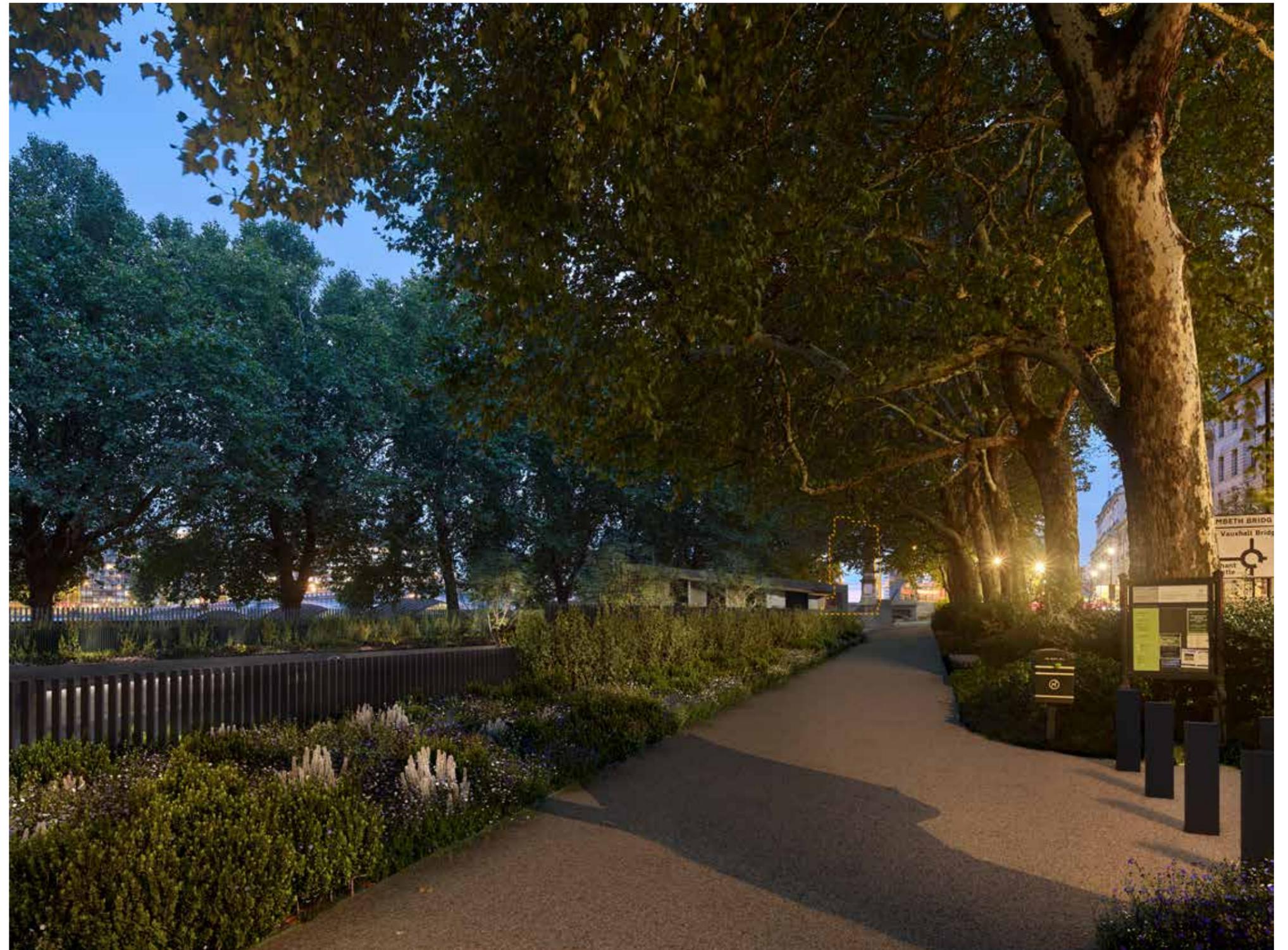
CUMULATIVE DAY TIME

3.122 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

- 3.123 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.
- 3.124 Therefore, the effect would remain **Minor Adverse**.



VIEW 22: TC6A

EXISTING DAY TIME

- 3.125 This viewpoint is situated within the open space of Victoria Tower Gardens, oriented north towards the Houses of Parliament and Westminster World Heritage Site.
- 3.126 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.
- 3.127 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.
- 3.128 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.
- 3.129 The value attached to the view is High.
- 3.130 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.



EXISTING NIGHT TIME

- 3.131 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 the distinction, and contributes to the sense of a city centre location.
- 3.132 The Buxton Memorial is not illuminated and is thus a less prominent feature than in the day time view.
- 3.133 The value of the view remains the same.
- 3.134 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 DAY TIME

- 3.135 The foreground of the view would take in the courtyard space at the entrance to the Memorial and Learning Centre. Landscaping within the courtyard includes planted boundaries along both sides of the space, and ground and tree planting within. New seating is proposed, and the spaced vertical columns of the boundary fence allow light and views through to the Buxton Memorial, and the park beyond.
- 3.136 The viewer's attention is drawn towards the bronze fins, and between them, the entrances to the Learning Centre below. The Proposed Development will necessarily result in a loss of openness in the landscape as seen from this perspective.
- 3.137 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.
- 3.138 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.
- 3.139 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.
- 3.140 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.
- 3.141 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.



- 3.142 Due to the change in the view toward the World Heritage Site, the magnitude of effect would be High.
- 3.143 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

- 3.144 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.
- 3.145 The illuminated Victoria Tower and Elizabeth Tower in the background would remain a prominent feature behind the memorial.
- 3.146 The overall effect would thus remain **Moderate Beneficial**.



CUMULATIVE DAY TIME

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



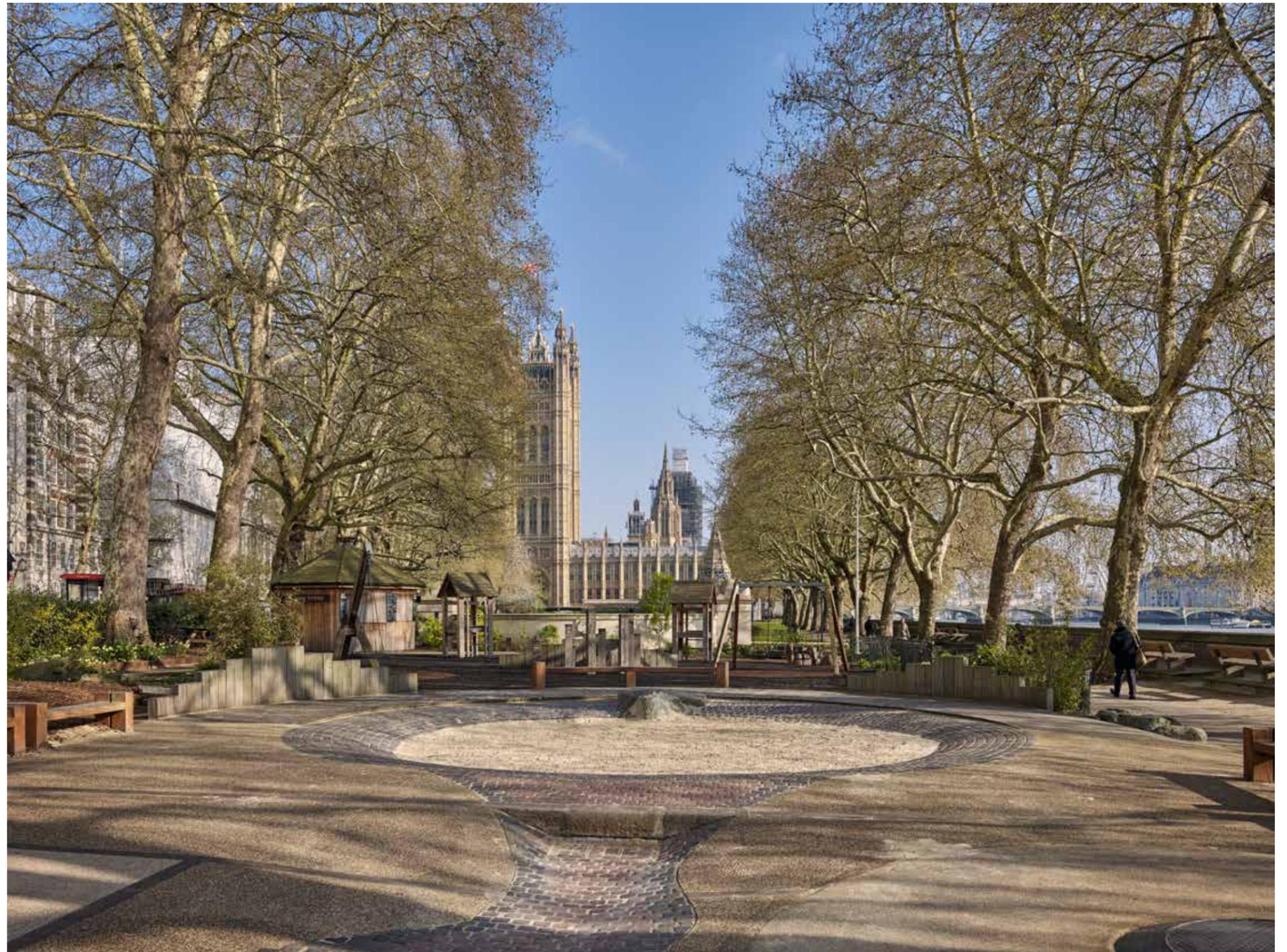
CUMULATIVE NIGHT TIME

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



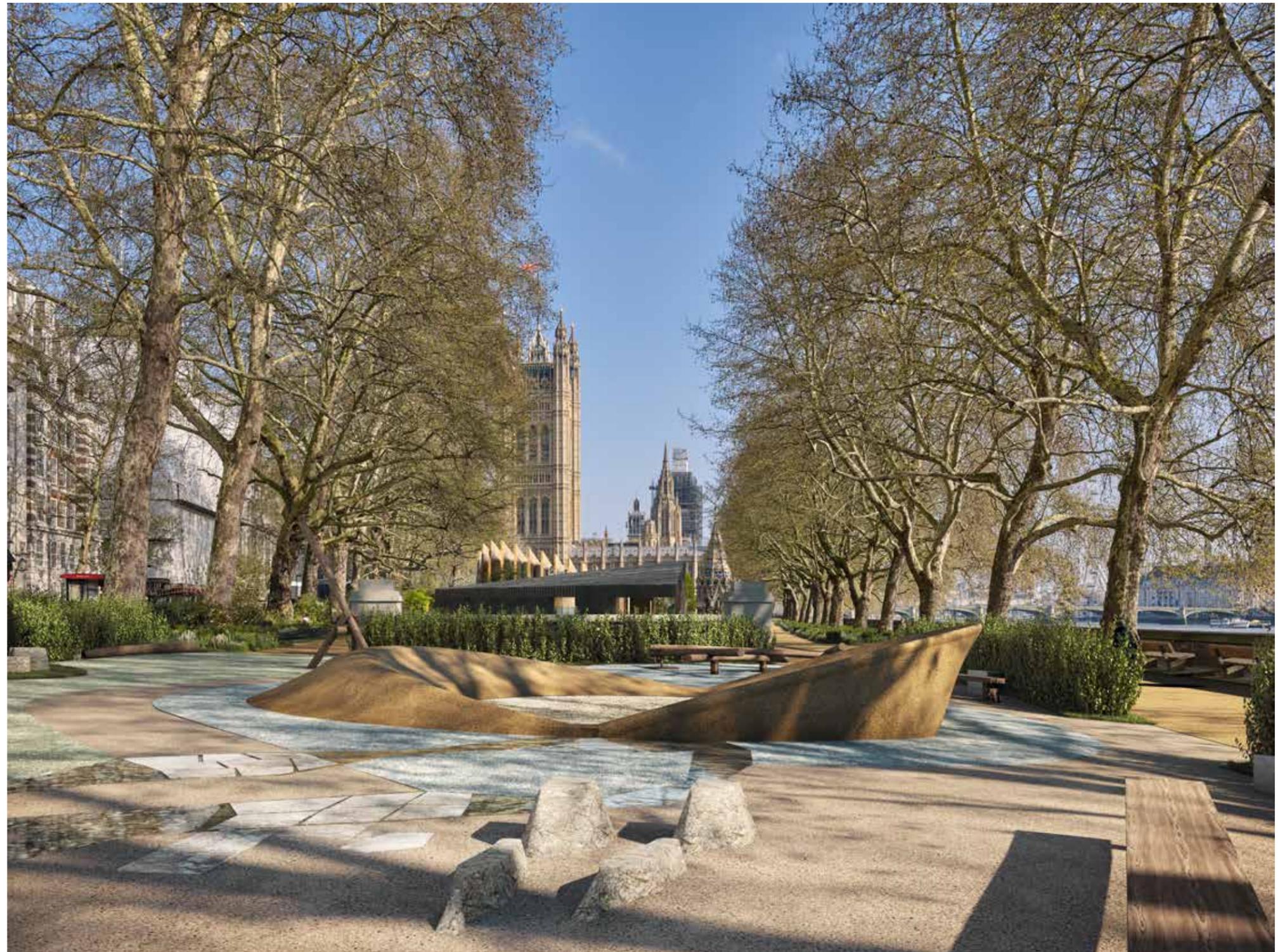
VIEW 23: SOUTHERN EXTENT OF VICTORIA TOWER GARDENS**EXISTING**

- 3.150 This viewpoint is situated within the play area space in Victoria Tower Gardens, towards its southern extent. The viewer would be aware of public toilets behind to their right, which are frequented by pedestrians.
- 3.151 The view takes in the wide space of hard standing in the foreground, and an irregular range of children's play equipment in the middle ground. The extent of this space is defined by the anterior side of the curved Spicer Memorial. The park is defined by the low embankment wall to the right, and the two mature bands of trees to both sides.
- 3.152 The Victoria Tower is the tallest feature in the view, with the clock tower partially visible to the right, though this is not a position from which their form and value can be best appreciated.
- 3.153 The continuous line of buildings along Millbank defines the view to the left, whilst the open space of the river to the viewer's right allows some views through the trees towards Westminster Bridge and the opposite bank.
- 3.154 The Buxton Memorial is partially discernible to the right hand side, though its lower parts are obscured by the existing built form.
- 3.155 The value attached to the view is Medium.
- 3.156 The view would primarily be experienced by a number of visitors to the play area, and users of the amenity space within the park. Their focus would be on their respective activities within the park space. In addition, the view would be experienced by a number of pedestrians, whose focus would be on wayfinding and moving through the park. These visual receptors have a Low susceptibility to change and Moderate sensitivity.



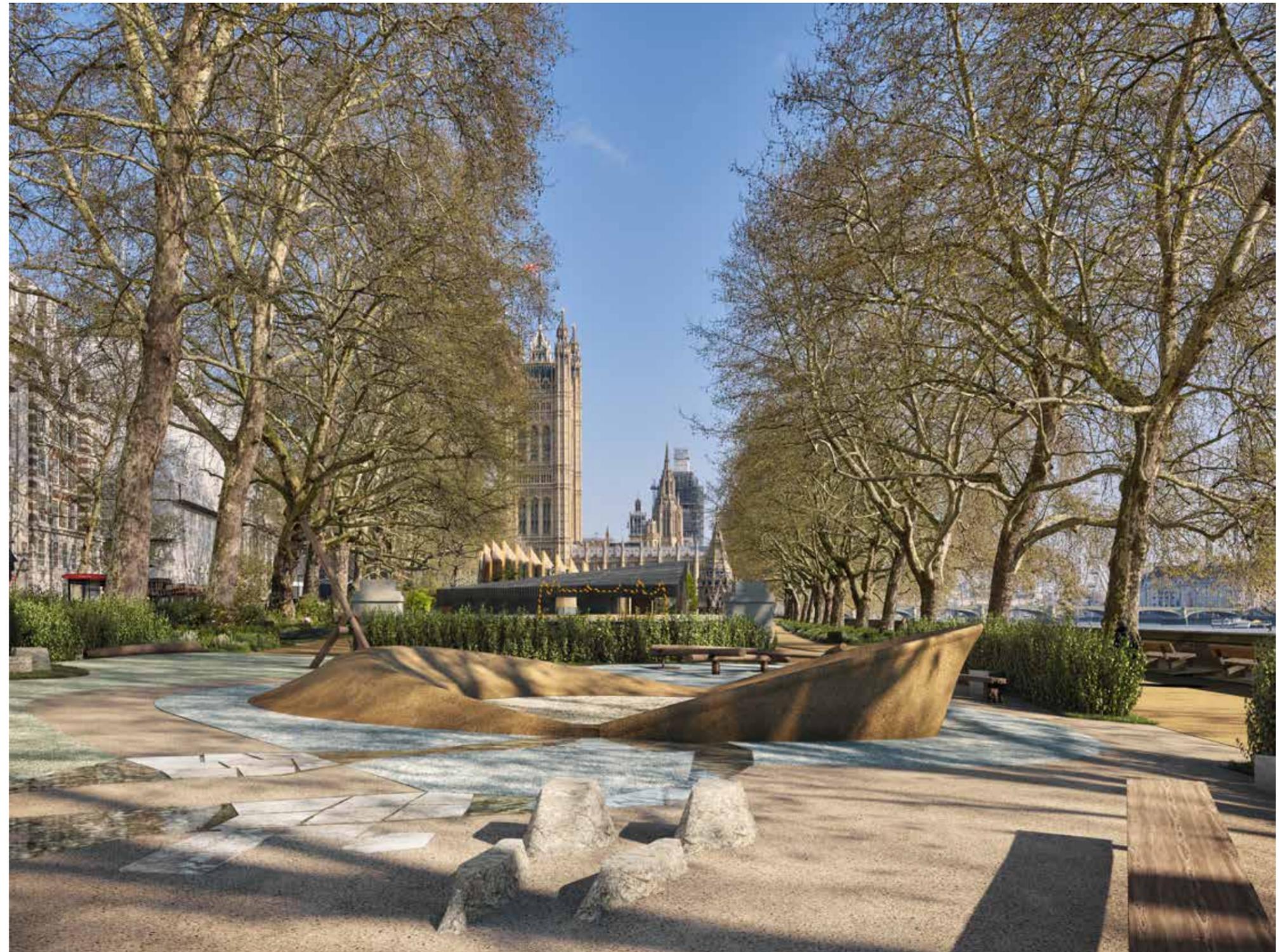
PROPOSED

- 3.157 At site preparation and construction phase, following the adoption of the identified mitigation measures in the Construction Management Plan (Appendix C to Volume 5 of the ES) the presence of hoardings and construction activity is likely to result in a temporary Minor Adverse effect, however these would be temporary and are considered to be an expected part of a development site within a central London location.
- 3.158 The character of the view, and the differentiation between the open space of the play area and built form in the middle ground, would remain.
- 3.159 From this position, the viewer is able to appreciate the relationship between the materiality and form of the fins and the buildings of the Palace of Westminster in the background of the view.
- 3.160 The Victoria Tower is partially obscured by the memorial, though, as discussed previously, this would not be an obvious place from which to appreciate its form. The triangular roof form of the entrance pavilion forms an attractive, sculptural addition, which has a lightweight form to allow views and light in and out of the space within the memorial courtyard, creating a sense of permeability in the middle ground of the view.
- 3.161 The Buxton Memorial remains a prominent feature to the viewer's right, seen in conjunction with the sculptural Holocaust Memorial adjacent, and the curved form of the Spicer Memorial.
- 3.162 The enhanced planting to either side of the park, and in the middle ground, softens the appearance of the built form and the upgraded play area, and makes a positive contribution to the view.
- 3.163 The magnitude of impact would be medium. The overall effect would be **Minor Beneficial**. The effect would be direct, local and permanent.



CUMULATIVE

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



// UNITED KINGDOM HOLOCAUST MEMORIAL AND LEARNING CENTRE



Addendum Visual Assessment

4.0 HERITAGE IMPACT ASSESSMENT PROCESS

4.1 As part of the original ES, an assessment of the Outstanding Universal Value of the Palace of Westminster and Westminster Abbey, including St Margaret's Church World Heritage Site has been undertaken, as well as the potential effect of the Proposed Development upon that OUV.

4.2 This has been undertaken in accordance with accepted best practice guidance, including the ICOMOS 'Guidance for Heritage Impact Assessments for Cultural World Heritage Properties' (2011).

4.3 We note that Historic England considered the information provided as part of our assessment to be sufficient to enable them to form a view on the impact of the Proposals.

4.4 Notwithstanding, in response to comments from consultees made subsequent to the submission of the application, we set out how our original assessment relates to the stages of Heritage Impact Assessment identified in the ICOMOS guidance below. This is to enable the reader's clear and easy understanding of the process we have undertaken in considering the OUV of the World Heritage Site, and the potential impact of the Proposed Development upon that OUV.

Heritage Impact Report Contents

4.5 Appendix 4 to the ICOMOS guidance sets out a number of sections to be included in a Heritage Impact Report. Below, we indicate where the reader may find each stage within Volume 3 of the ES and this addendum.

1 Non-technical summary – must contain all key points and be useable alone.

4.6 The Executive Summary at Volume 3 of the ES provides a non-technical summary of the impact of the Proposed Development.

2 Contents

4.7 This can be found on page 1 of Volume 3 in the ES and page 1 of this addendum.

3 Introduction

4.8 The introduction to the Heritage Impact Report is set out at **Section 1.0** of Volume 3 in the ES and **Section 1.0** of this Addendum.

4 Methodology

- Data sources
- Published works
- Unpublished reports
- Databases
- Field Surveys
- Impact Assessment Methodology
- Scope of Assessment
- Evaluation of Heritage Resource
- Assessment of Scale of Specific Impact and Change
- Evaluation of Overall Impact
- Definition of the Assessment Area
- Our assessment methodology is set out at **Section 2.0** of Volume 3 in the ES.

5 Site history and description and Statement of OUV, and a description of the attributes which convey OUV and which contribute to the Statements of authenticity and integrity.

4.9 A description of the Site history is set out at **Section 4.0** of Volume 3 in the ES.

4.10 The attributes which convey OUV are identified at **Section 5.0** of Volume 3 in the ES.

6 Description of changes or developments proposed

4.11 A description of the Proposed Development is included at **Section 1.0** of Volume 3 of the ES and **Section 1.0** of this addendum.

7 Assessment and evaluation of overall impact of the proposed changes on the attributes of OUV and other heritage assets.

4.12 An assessment and evaluation of the potential impacts of the Proposed Development on OUV and other heritage assets is set out at **Sections 7.0** and **8.0** of Volume 3 in the ES and **Section 2.0** of this addendum.

4.13 There is some overlap with the visual assessment at **Section 10.0**, which includes an assessment of the potential impact on number of protected and local views towards the World Heritage Site, from which its OUV can be appreciated.

8 Measures to avoid, to reduce or to compensate for impacts - Mitigation Measures

4.14 Identified mitigation measures are described at **Section 7.0** of Volume 3 in the ES.

9 Summary and Conclusions, including:

4.15 A clear statement on effects on the Outstanding Universal Value of the WHS, its integrity and authenticity,

4.16 The risk to the Inscription of the site as a WH property,

4.17 Any beneficial effects, including better knowledge and understanding and awareness-raising

4.18 A summary and the conclusions of the Heritage Assessment is set out at **Section 12.0** of Volume 3 in the ES, in the Executive Summary of Volume 3, and at **Section 2.0** of this addendum.

