

**United Kingdom Holocaust Memorial
and Learning Centre**

Planning Statement
December 2018

The Secretary of State for Housing Communities and Local Government

CONTENTS

EXECUTIVE SUMMARY	1
1.0 INTRODUCTION	4
2.0 SITE DESCRIPTION	8
3.0 CONSULTATION.....	11
4.0 THE PROPOSED DEVELOPMENT	14
5.0 PLANNING POLICY FRAMEWORK.....	29
6.0 PLANNING POLICY ASSESSMENT	31
7.0 PLANNING OBLIGATIONS	63
8.0 CONCLUSION.....	65

EXECUTIVE SUMMARY

DP9 Ltd have been appointed by the Secretary of State for Housing, Communities and Local Government to submit a planning application for the installation of the United Kingdom Holocaust Memorial and Learning Centre within Victoria Tower Gardens, Millbank, London to Westminster City Council.

The United Kingdom Holocaust Memorial and Learning Centre is intended to have a profound effect on how British citizens and their political representatives, as well as overseas visitors, remember the Holocaust and learn lessons from it in confronting racism and conflict between communities. Its location in Victoria Tower Gardens, in the heart of Westminster, the historic, physical and symbolic centre of the state, will give the Memorial the prominence it deserves.

The United Kingdom Holocaust Memorial and Learning Centre is the UK's national establishment for remembrance of the Holocaust. It is dedicated to the six million Jewish men, women and children murdered in the Holocaust and all other victims of the Nazis and their collaborators.

The United Kingdom Holocaust Memorial and Learning Centre will stand as a reminder of the horrors of the past and will encourage reflection on their implications for British government and society, both at the time and subsequently. The view of Parliament from the Memorial will serve as a permanent reminder that political decisions have far-reaching consequences. By setting history's worst example of the disintegration of democratic values against the greatest emblem of Britain's aspirations for democracy, it will stand as a permanent reminder of the responsibilities of citizens in a democracy to be vigilant and responsive whenever and wherever those values are threatened.

This Planning Statement assesses the planning considerations associated with the proposed development against the provisions of the Development Plan and concludes that the proposed development accords with all national, regional and local planning policy delivering significant planning and public benefits including, but not limited to:

-
- Delivery of the United Kingdom Holocaust Memorial and Learning Centre that:
 - Combines a striking architectural monument with an engaging, reflective and powerful exhibition;
 - Aims to both remember and encourage reflection on the lessons of the past amongst all British citizens and visitors of all nationalities, reaffirming Britain's commitment to stand up against antisemitism, prejudice and hatred in all its forms; and
 - Will work with other institutions across the UK supporting Holocaust commemoration and education.

 - A Memorial of distinctive and exceptionally high quality architecture which:
 - Would be a positive addition to the Victoria Tower Gardens;
 - Responds sensitively to both its location and context; and
 - Preserves the intrinsic Outstanding Universal Value of the Westminster World Heritage Site.

 - Provides sensitive planting and landscaping that will enhance the visual and amenity value of the Gardens to create a peaceful place of calm and reflection for visitors, workers and local residents to enjoy.

 - The grassed open space within the Gardens will be re-laid with significantly improved drainage with significant shrub and flower planting around the Gardens.

 - Pathways throughout the Gardens will be regraded and made more permeable to improve soil conditions for trees and accessibility requirements.

 - Landscaping and seating will be provided around Buxton Memorial to improve the setting, viewing experience and accessibility to the memorial itself.

 - A raised walkway and new seating will be provided along the River Thames embankment, which are separate from the main circulation route and will improve visibility of the river.

- Horseferry Playground will be repositioned and enhanced, providing sand and waterplay, climbing, swinging, sliding, balancing, sensory and role play. The existing refreshments kiosk will be replaced with a new modern kiosk which provides a covered seating area.

If a different view is formed in this case, we consider that the national and international significance of the United Kingdom Holocaust Memorial and Learning Centre would constitute material considerations which would more than outweigh any alleged harm, and would be overwhelmingly in favour of the grant of planning permission.

1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared by DP9 Ltd in support of an application for planning permission. The application is submitted on behalf of the Secretary of State for Housing, Communities and Local Government (hereafter referred to as “the Applicant”) for the installation of the United Kingdom Holocaust Memorial and Learning Centre (herein referred to as “the Proposed Development”) within Victoria Tower Gardens, Millbank, London (herein referred to as “the Site”).
- 1.2 After an international competition with ninety-two entries, the scheme by Adjaye Associates, Ron Arad Architects and Gustafson Porter + Bowman was unanimously selected as the winning proposal. The team’s sensitive and emotionally powerful design was chosen by a jury including the Secretary of State for Communities and Local Government, the Mayor of London, Chief Rabbi, leading experts in architecture and design and first and second generation Holocaust survivors.
- 1.3 The Proposed Development will deliver a Memorial and Learning Centre in the shadow of Parliament, increasing the visibility and scope of Holocaust awareness and education in the United Kingdom.
- 1.4 The Learning Centre will contextualise the Memorial situated above and use the stories and facts of the Holocaust to explore antisemitism, extremism, Islamophobia, racism, homophobia and other forms of hatred and prejudice in society.

The Planning Application

- 1.5 The description of the Proposed Development is as follows:

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

1.6 The submission of this application follows discussions with a wide range of stakeholders and statutory consultees, including the planning, design and highways departments at Westminster City Council, the Greater London Authority (GLA), Transport for London (TfL), the Environment Agency (EA), Historic England, Royal Parks, Ward Councillors, local amenity groups and local residents.

Planning Application Documents

1.7 The following documents form *part* of the application for planning permission and are submitted for approval:

- Completed planning application form and ownership certificates, prepared by DP9 Ltd;
- Site Location Plan, prepared by Adjaye Associates;
- Planning drawings for approval, prepared by Adjaye Associates, Ron Arad Associates; and Gustafson Porter + Bowman

1.8 The following documents are submitted in *support* of the application for planning permission:

- Community Infrastructure Levy Additional Information Requirement Form, prepared by DP9 Ltd;
- Design and Access Statement, prepared by Adjaye Associates with Ron Arad Associates, Gustafson Porter + Bowman and WSP;
- Energy Statement, prepared by WSP;
- Sustainability Statement, prepared by WSP
- BREEAM Pre-assessment, prepared by WSP;
- Ventilation Statement, prepared by WSP;
- Visitor Management Strategy, prepared by UKHMF;
- Arboricultural Impact Assessment, prepared by Bartlett;
- Wind Microclimate Assessment, prepared by WSP;
- Structural Methodology Statement, prepared by WSP;
- Waste Management Strategy, prepared by WSP;
- Utilities Statement, prepared by WSP;
- Statement of Community Involvement, prepared by Four Communications; and

- Environmental Statement, prepared by Atkins and others including:
 - Volume 1: Non-Technical Summary;
 - Volume 2: Environmental Statement;
 - Volume 3: Built Heritage, Townscape and Visual Impact Assessment
 - Volume 4: Figures / Drawings; and
 - Volume 5: Appendices:
 - Appendix A: Scoping Opinion;
 - Appendix B: Long list of major accidents and/or disasters;
 - Appendix C: Construction Management Plan;
 - Appendix D: Noise Surveys and Assessments;
 - Appendix E: Air Quality Information;
 - Appendix F: Archaeological Desk Based Assessment;
 - Appendix G: Population and Human Health Baseline Information;
 - Appendix H: Daylight, Sunlight and Overshadowing Study;
 - Appendix I: Site Investigation Report (March 2016);
 - Appendix J: Preliminary Geotechnical Site Investigation Desktop Study (July 2018);
 - Appendix K: Flood Risk Assessment;
 - Appendix L: Drainage Strategy;
 - Appendix M: Transport Assessment;
 - Appendix N: Assessment of Cumulative Effects – Long List of Development

Structure of this Statement

1.9 The purpose of the Planning Statement is to assess the Proposed Development against the provisions of the Development Plan and other material considerations which are relevant to Site determination. The statement is structured as follows:

- **Section 2:** Site Description - Describes the Site, the main features of the surrounding area and the Site's planning history.
- **Section 3:** Consultation – Explains the consultation undertaken by the Applicant with local stakeholders prior to submission of the application;

- **Section 4:** Proposed Development – Describes the application proposal;
- **Section 5:** Planning Policy Framework - This section identifies the key national, regional and local planning policy and guidance relevant to the determination of the application for the Development;
- **Section 6:** Planning Policy Assessment - This section evaluates the development against the Development Plan and other material considerations;
- **Section 7:** Planning Obligations - This section summarises the planning obligations;
- **Section 8:** Conclusions - This section sets out the conclusion of this Statement.

2.0 SITE DESCRIPTION

The Application Site

- 2.1 The Site is located within Victoria Tower Gardens, Millbank, London, a Grade II Registered Garden located on the north bank of the River Thames, immediately south of the Palace of Westminster. The Site is bounded by Millbank to the west, the River Thames to the east and Horseferry Road / Lambeth Bridge to the south.
- 2.2 Victoria Tower Gardens was first created in the late nineteenth century and enlarged to its current extent in 1914. The layout of the gardens was further modified in 1923 and 1933 with the last major re-organisation taking place in the 1950s.
- 2.3 Within Victoria Tower Gardens there are three listed structures: the statue of Emmeline Pankurst (Grade II listed), the statue of the Burghers of Calais (Grade I listed) and the Buxton Memorial Fountain (Grade II* listed). The Grade II listed River Embankment from the Houses of Parliament to Lambeth Bridge forms the eastern (river) edge of Victoria Gardens.
- 2.4 The Site is also within the setting of a number of other listed buildings and structures, most notably the Grade I listed Palace of Westminster. Other designated heritage assets in the vicinity include: Lambeth Bridge (Grade II listed), Victoria Tower Lodge and Gates to Black Rod Garden (Grade I listed), Northwest House, Millbank (Grade II listed), The Church Commissioners (Grade II* listed) and Lambeth Palace (Grade I listed).
- 2.5 The Site is located within the Westminster Abbey and Parliament Square Conservation Area, immediately south of the Westminster Abbey and St. Margaret's Church World Heritage Site and east of the Smith Square Conservation Area.
- 2.6 The surrounding area has an extremely large and diverse range of buildings dating from the twelfth century to modern times. The majority of the buildings within the Conservation Area are listed; however, buildings of all eras and styles contribute to its character.

-
- 2.7 The Site is located within the Core Central Activity Zone (CAZ), the Thames Policy Area and Flood Zone 3. The Site benefits from a PTAL rating of 6a, reflecting the excellent accessibility of the Site to public transport. Westminster Underground Station is located approximately 600m from the site in addition to Abingdon Street and Millbank bus stops which are located immediately west of the Site on Millbank.

Westminster Abbey and Parliament Square Conservation Area

- 2.8 Westminster City Council's Conservation Area Audit for Westminster Abbey and Parliament Square (2008) sets out the history, context and character of the area.
- 2.9 The Westminster Abbey and Parliament Square Conservation Area was first designated in 1969 and extended in 1987 and 2008. The Conservation Area is located in the southeast of the City of Westminster with Millbank and Lambeth Bridge forming its southern boundary. The neo-Gothic architecture of the Palace of Westminster dominates the conservation area, while Victoria Tower Gardens enjoys a riverside location, with expansive views along the Thames and to the Victoria Tower. The wider conservation area has a unique and complex character that has been shaped by its gradual evolution and its role as a seat of the Church and State.
- 2.10 The architecture of the conservation area has an extremely large and diverse range of buildings, dating from the twelfth century to modern times. The majority of these buildings are listed, many were designated by some of the most famous architects of their time, and overall the building fabric is of exceptional quality and interest.

Site Planning History

- 2.11 This section summarises the planning history of the Site which is most relevant to the Proposed Development.
- 2.12 Planning and listed building consent was granted in January 2007 for the construction of paved area with seating and lighting around the Buxton Memorial (Ref. 06/0888/FULL & 06/04210/LBC).

- 2.13 In March 2014 an application was approved for upgrade works to Victoria Tower Gardens including extension of the children's play area; renovation and extension of the public toilets; the demolition, relocation and refurbishment of the Spicer Memorial; provision of a small refreshments kiosk; and alignment of the pedestrian entrance off Millbank (Ref. 13/01417/FULL).
- 2.14 In connection with the above planning consent, in March 2014 listed building consent was granted for the renovation and extension of the public toilet within Lambeth Bridge (Ref. 13/10419/LBC).
- 2.15 Planning permission was granted on 10 June 2014 for the erection of a new education centre for the Palace of Westminster for a temporary period of 10 years with associated alterations to the Victoria Tower Gardens landscaping (Ref. 13/07747/FULL).

3.0 CONSULTATION

3.1 This Section should be read in conjunction with the Statement of Community Involvement prepared by Four Communications, which is submitted in support of the planning application.

3.2 The Proposed Development has been discussed in detail with Westminster City Council planning, design and highways departments and other relevant officers of the Council, Historic England, Royal Parks and the GLA. Activities undertaken as part of the consultation have included;

- A meeting with the Deputy Leader of Westminster City Council and Cabinet Member for Economic Development, Education and Community and the Cabinet Member for Place Shaping and Planning;
- A meeting with the Leader of the Council
- Two meetings with the St James's Ward Councillors;
- Two meetings with the Save Victoria Tower Gardens Campaign Group;
- Two meetings with the Thorney Island Society and
- A meeting with the Leader of the Opposition of Westminster City Council.

3.3 In addition to the consultation above, a full public consultation programme has also been undertaken in order to obtain the views of local residents and interested parties with regards to the Proposed Development within Victoria Tower Gardens. Two pre-application public exhibitions were held on 4 - 8 September 2018 and 5 – 8 December 2018 at Church House, within close proximity to the Site. The Statement of Community Involvement prepared by Four Communication provides full details of the consultation process and responses received.

September 2018

3.4 The emerging proposals were launched publicly in September 2018 with a public exhibition held at Church House Conference Centre, Great Smith Street, Westminster, a prominent venue close to the Site. 3,657 local residents and businesses received invitations to the exhibition, along with Westminster City Councillors, local stakeholders, relevant members of the London

Borough of Lambeth, the Houses of Parliament and organisations linked to the UK Holocaust Memorial Foundation.

- 3.5 Over 370 people visited the exhibition. Attendees included neighbouring residents, workers, councillors, as well as visitors from further afield. Feedback was used to inform the further development of the proposals and understand what attendees wanted to see more detail about.

December 2018

- 3.6 A second public exhibition was held between 5 and 8 December 2018, which provided an opportunity for the project team to address concerns raised at the previous public exhibition and to present the public with the scheme to be submitted to Westminster City Council for planning permission.
- 3.7 All those invited to the first exhibition received invitations, whilst further copies were also sent by email to those who had supplied contact details during the first public exhibition in September. The event was also publicised on social media and online.
- 3.8 Over 250 people attended the exhibition and were invited to provide their comments on the final scheme.

Key Themes from the Consultation Process

- 3.9 Whilst the majority of consultees supported the principle of creating a Memorial and Learning Centre, a large majority did not support the choice of location. Many of those felt Victoria Tower Gardens was the wrong location and were concerned about the following:
- Additional visitors to Victoria Tower Gardens;
 - The management of coaches and construction traffic;
 - The increased security risk;
 - The impact on the amount of green space available locally; and
 - The impact on the trees.

3.10 Following submission of the planning application, the Applicant remains committed to consulting and engaging with local residents and other stakeholders. The intention is to maintain the dialogue with those individuals and organisations who have expressed interest in the Proposed Development and keep them up to date with the project.

4.0 THE PROPOSED DEVELOPMENT

The National and International Significance of the United Kingdom Holocaust Memorial and Learning Centre

- 4.1 The United Kingdom Holocaust Memorial and Learning Centre (UKHMLC) is intended to have a profound effect on how British citizens and their political representatives, as well as overseas visitors, remember the Holocaust and learn lessons from it in confronting racism and conflict between communities. Its location in the heart of Westminster in the historic, physical and symbolic centre of the state will give the Memorial the prominence it deserves.
- 4.2 The memorial has been carefully designed to complement and respect the character of Victoria Tower Gardens. The sensitive planting and landscaping will enhance the visual and amenity value of the gardens to create a peaceful place of calm and reflection for visitors, workers and local residents to enjoy.
- 4.3 The UK Holocaust Memorial Foundation has recently set out a Mission Statement which has been agreed by the Secretary of State for Housing, Communities and Local Government.

Mission Statement

- 4.4 The United Kingdom Holocaust Memorial is the UK's national establishment for remembrance of the Holocaust. It is dedicated to the six million Jewish men, women and children murdered in the Holocaust and all other victims of the Nazis and their collaborators.
- 4.5 The Memorial will stand as a reminder of the horrors of the past and will encourage reflection on their implications for British government and society, both at the time and subsequently. The view of Parliament from the Memorial will serve as a permanent reminder that political decisions have far-reaching consequences. By setting history's worst example of the disintegration of democratic values against the greatest emblem of Britain's aspirations for democracy, it will stand as a permanent reminder of the responsibilities of citizens in a democracy to be vigilant and responsive whenever and wherever those values are threatened.

- 4.6 We seek to preserve the memory of the Holocaust whilst also considering its contemporary relevance. The Holocaust – the murder of Europe’s Jews by Nazi Germany and its collaborators – remains unsurpassed as a historical event in its aims and extent, yet the questions it raises have many echoes in the modern world, including (but not restricted to) subsequent genocides and the persistence of antisemitism.
- 4.7 Deeper understanding of the Holocaust, and of Britain’s responses to it, therefore prompts us to ask challenging questions about human behaviour and the world around us. The UK Holocaust Memorial will thus aim both to remember and to encourage reflection on the lessons of the past amongst all British citizens and visitors of all nationalities. In dedicating itself to this mission, Britain reaffirms its commitment to stand up against antisemitism, prejudice and hatred in all its forms.

How we will deepen understanding of the Holocaust and Britain’s response

- 4.8 We seek to combine a striking architectural monument with an engaging, reflective and powerful exhibition. This will be founded on academic research and judicious use of sources, combined with an experiential approach to immerse visitors in the historical content and provoke their critical thinking.
- 4.9 The display will confront the immense human calamity caused by the destruction of Europe’s Jewish communities during the Holocaust, arousing a sincere commitment to mourn, remember and act. Victims will be remembered as individuals, not nameless statistics.
- 4.10 The thematic exhibition will set the Holocaust within the British narrative: historically, politically and culturally. This narrative will be balanced, addressing the complexities of Britain’s ambiguous responses to the Holocaust, avoiding simplistic judgements and encouraging visitors to critically reflect on whether more could have been done, both by policymakers and by society as a whole.

-
- 4.11 We will work with other institutions across the UK supporting Holocaust commemoration and education. We will complement the permanent exhibition with online material, drawing on the same research and sources, making links to other relevant sites, and promoting a deeper understanding of the Holocaust among as wide an audience as possible.
- 4.12 Facing history honestly requires us to question the role of our own Parliament, government and society in the history of the Holocaust, and recurring genocides in its aftermath. The obligation to confront the contemporary rise of antisemitism will not be overlooked, in light of the recent rise of extremist views in Britain and many other countries internationally.
- 4.13 The significance and importance of the United Kingdom Holocaust Memorial and Learning Centre both nationally and internationally is unquestioned.

Background

- 4.14 In January 2015 under Prime Minister David Cameron, the Prime Minister’s Holocaust Commission Report “Britain’s Promise to Remember” was published. The report looked at how the country should ensure the memory of the Holocaust is preserved and that the lessons that it teaches are never forgotten. The report identified four fundamental gaps in Britain’s current efforts to commemorate and educate about the Holocaust:
- i) Widespread dissatisfaction with the current national memorial in Hyde Park;
 - ii) Effective Holocaust education fails to reach significant numbers of young people;
 - iii) Inadequate support for regional projects compounded by a lack of long-term funding for Holocaust education; and
 - iv) The testimony of survivors and liberators needs to be urgently recorded and appropriately preserved.
- 4.15 To address the gaps listed above, the Commission made four main recommendations:
- i) A striking and prominent new National Memorial;

- ii) A World-Class Learning Centre at the heart of a campus driving a network of national educational activity;
- iii) An endowment fund to secure the long-term future of Holocaust Education – including the new Learning Centre and projects across the country; and
- iv) An urgent programme to record and preserve the testimony of British Holocaust survivors and liberators.

4.16 The report also stated that “*there should be a striking new memorial to serve as the focal point for national commemoration of the Holocaust. It should be prominently located in Central London to attract the largest possible number of visitors and to make a bold statement about the importance Britain places on preserving the memory of the Holocaust.*” The memorial will stand as a permanent affirmation of the values of our society.

4.17 Following the publishing of the Prime Minister’s Holocaust Commission Report in January 2015, the UK Holocaust Memorial Foundation (UKHMF) was created to implement the recommendations of the report. The UKHMF is an advisory board to the Ministry of Housing, Communities and Local Government; it has cross-party support and is now co-chaired by the Rt Hon Lord Pickles and the Rt Hon Ed Balls.

Site Selection

4.18 The Prime Minister’s Holocaust Commission Report (January 2015) identified three potential sites for the United Kingdom Holocaust Memorial and Learning Centre:

1. Potters Field, next to the Mayor of London’s office;
2. Millbank Tower; and
3. Imperial War Museum (IWM).

4.19 These sites were identified as an indication of the type of location that would have some prominence and resonance. They were not intended as an exhaustive list. The reasons why they were discounted are as follows:

- Potters Field was part of a s106 agreement between the LB Southwark and the developer to deliver a cultural use next to the GLA's office as part of the residential development. The site was eventually sold to the new Bridge Theatre and therefore is no longer available.
- Millbank was also part of a major planning application to convert Millbank from an office tower to a residential tower. It was expected that the s106 agreement might make part of the podium block available for cultural use. To date, there is no evidence of redevelopment coming forward at this site and occupational office leases have now been extended to 2022.
- The proposition offered to the Applicant by the IWM was a two-dimensional text based memorial covering a side elevation of the building, with no prominence and a below-ground learning centre adjacent to it. The land was owned by LB Lambeth not the IWM. It was considered that the site lacked significance and that the activities would be subsidiary to the far larger remit of the IWM, whose aims in remembering Britain at war are not identical with the aims of the UKHMLC.

Since the site selection process, in early December 2018, the IWM and UKHMF have committed to work closely together as the exhibition within the Learning Centre is developed, to ensure that the curation and narrative does not replicate IWM's plans for its new galleries. Visitors to the Holocaust Memorial and Learning Centre will be encouraged to explore other resources, including the IWM's new Holocaust galleries which are due to open in 2021. At the core of the Holocaust Memorial and Learning Centre is a commitment to learn from one of the darkest chapters in our history, to ensure that everyone has an opportunity to explore the universal lessons of the Holocaust as a reminder of where hatred, intolerance and prejudice can lead if left unchecked.

4.20 In Autumn 2015 the UKHMF Board agreed that a leading firm of property consultants should be appointed to carry out a search for a suitable site for the UKHMLC. CBRE was appointed from the firms approached to carry out a detailed thorough site search. The area of search was broadly consistent with the main Central London tourist / museum areas i.e. South Kensington (National History Museum, Science Museum, V&A) to the west; Tower of London to the east; Regent's Park to the north and Westminster and the river to the south. CBRE also wrote to and

met with a number of parties to establish if there were any other sites available not on the market including:

- The estates officers of local authorities in the search area
- The Real Estate Investments Trusts with London portfolios
- The landed Estates
- Other investors and developers.
- Other agents.

4.21 In January 2016 twenty-four sites were identified by CBRE and considered by the UKHMF. However, all the sites identified in the site selection search suffered from at least one of the following disadvantages:

- Poor visual prominence;
- No emotional or political logic;
- Little or no outdoor space to provide a prominent memorial;
- Cost prohibitive.

4.22 The three preferred sites identified by CBRE were:

- The Royal College of Gynaecologists in Regent's Park (27 Sussex Place)
- A part of the Knightsbridge Barracks
- A part of Middlesex Hospital

4.23 It was determined that none of the above referenced shortlisted sites were suitable for the following reasons:

- The Royal College of Gynaecologists in Regent's Park (27 Sussex Place) was cost prohibitive and has now been sold to its neighbour the London Business School;

- Knightsbridge Barracks would have been dependent on the sale and redevelopment of the whole barracks which would not have been in UKHMF's control [and has not yet happened]; and
- Middlesex Hospital was not considered to be a sufficiently prominent location for the UKHMLC.

4.24 In January 2016 following discussions involving the Government Property Unit, Victoria Tower Gardens emerged as a possible site. After careful consideration Victoria Tower Gardens was selected by the UKHMF Board as the outstanding candidate site for the following reasons:

- i) It provides an iconic location adjoining Parliament, sitting along the riverfront immediately next to the House of Lords;
- ii) Its relevance as a commemorative garden of Britain's national conscience, already containing significant memorial sculptures, marking momentous historic events, with significance for the struggle for human rights, that remain relevant today and will do so in the future;
- iii) It is visually prominent and adjacent to one of the most visited parts of London, within easy reach of a major tube station and many bus routes;
- iv) The resonance of being next to Parliament and on the bank of the Thames is exceptional; and
- v) Under the shadow of Victoria Tower, the Holocaust Memorial and Learning Centre would question the impacts of the Holocaust and subsequent genocides on our own Parliament.

4.25 The decision to select Victoria Tower Gardens as the location for the United Kingdom Holocaust Memorial and Learning Centre was announced by the Prime Minister, David Cameron, at Prime Minister's Questions on 27 January 2016. The Prime Minister said:

“Last year, on the 70th anniversary of the liberation of Auschwitz, I said we would build a striking national memorial in London to show the importance Britain places on preserving the memory of the Holocaust. Today, I can tell the House that this memorial will be built in Victoria Tower Gardens. It will stand beside Parliament as a permanent statement of our values as a nation, and it will be something for our children to visit for generations to come. I am grateful to all those who have made this possible, and who have given this work the cross-party status that it so profoundly deserves.”

- 4.26 Only two weeks ago, on 5 December 2018, during Prime Minister’s Questions, Theresa May MP reaffirmed the Government’s commitment to the Memorial and to the suitability of the preferred site:

“... there is no better place for the Holocaust Memorial and Learning Centre to be than right next to our Parliament. What is important is that this is not just a memorial; it is a learning centre and it will be educating young people and others about the horrors of man’s inhumanity to man.”

Proposed Development

- 4.27 The description of the Proposed Development is as follows:

“Installation of the United Kingdom Holocaust Memorial and Learning Centre including excavation to provide a basement and basement mezzanine for the learning centre (Class 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”

- 4.28 As explained above, the Proposed Development will play an important role at a national, strategic and local level. The Proposed Development will deliver a memorial and learning centre in the shadow of Parliament, increasing the visibility and scope of Holocaust awareness and education in the United Kingdom.

4.29 In addition to the Memorial and Learning Centre, the scheme will also deliver significant public benefits within Victoria Tower Gardens.

4.30 A summary of the proposed works has been outlined below. A detailed description of the proposals is contained within the Design and Access Statement prepared by Adjaye Associates that supports this application.

- Installation of the United Kingdom Holocaust Memorial.
- Excavation to provide a basement and basement mezzanine Learning Centre.
- Erection of a single storey Entrance Pavilion.
- Hard and soft landscaping within a Memorial Courtyard.
- Public realm improvements within Victoria Tower Gardens including new and resurfaced footpaths, seating, hard and soft landscaping and lighting.
- Re-provision of Horseferry Playground and refreshments kiosk.
- Improvements to the setting of the Buxton Memorial and repositioning of the Spicer Memorial.

Land Use

4.31 The proposed land uses and associated floor areas are provided below.

Use	Proposed (GIA sqm)
Entrance Pavilion (ancillary Class D1)	95
Learning Centre (Class D1)	3,258
Refreshments Kiosk (Class A1)	41
Total	3,394

The Entrance Pavilion

4.32 The Entrance Pavilion located at the south end of the site, is a single storey building set back a sufficient distance from the repositioned Spicer Memorial and Horseferry Playground to enable an adequate entrance area for visitors to the Memorial.

-
- 4.33 The Entrance Pavilion incorporates a covered entrance at the east side, where tickets can be checked and visitor storage lockers are located. The Entrance Pavilion assists with pedestrian flow to the Memorial and Learning Centre in addition to providing safety and security screening.
- 4.34 As described in the Design and Access Statement, the material palette used seeks to reinforce the building's relationship with the surrounding area, whilst also taking into consideration technical requirements and the ageing of materials. Stone slabs are proposed for the exterior façade of the Entrance Pavilion, while bronze metal work will be used for the window frames and openings.

Memorial Courtyard

- 4.35 The Memorial Courtyard is a contemplative space that defines the relationship between the Entrance Pavilion and the Memorial and Learning Centre.
- 4.36 The Memorial Courtyard is designed to be paved with stone, creating a visual continuity from the Entrance Pavilion, while the terrace railings and gates are specified as bronze.
- 4.37 The perimeter between the Gardens and Courtyard is defined primarily as part of Victoria Tower Gardens, with layers of planting and hedges providing interest and character to those passing along the perimeter pathway. The planting height steps up towards the boundary railing, reducing its impact, and creating a natural backdrop when viewed from the Courtyard. Internally the planting is more controlled and creates a different landscape character appropriate to the Memorial's context.
- 4.38 The hedge that defines the Memorial Courtyard simultaneously acts as a security fence as it conceals a barrier within. The edge condition materializes into glass viewpoints at diverse points of the Courtyard perimeter to allow views in and out, and vertical steel rods at the interfaces with the Memorial Fins and the Entrance Pavilion.

The Memorial

- 4.39 The Memorial comprises 23 patinated bronze fins honouring the six million Jewish men, women and children who lost their lives in the Holocaust, and all other victims of Nazi persecution, including Roma, gay and disabled people.
- 4.40 The 23 bronze fins create 22 pathways into the Learning Centre below, representing each country in which Jewish communities were destroyed during the Holocaust.
- 4.41 The Memorial brings together three key materials – bronze, stainless steel and stone. The fins are clad in bronze panels of varying thicknesses, employing a living material that changes through its lifetime and reacts to its surroundings. The undercroft in-between the fin walls and beneath the landform is to be clad in elongated panels of polished stainless steel. The Memorial stairs and the threshold floor below will be clad with silvery-grey gneiss or granite stone

The Learning Centre

- 4.42 The Learning Centre will be constructed below ground with basement and basement mezzanine levels.
- 4.43 Through a careful sequencing of highly sensorial spaces, the proposed design for the Learning Centre will envelop users in the physical, intellectual and emotional experience of the Holocaust trauma and in doing so, will draw out themes of the constant and universal struggle for a better world.
- 4.44 Visitors will enter the Learning Centre through 22 passages formed by the bronze fins of the Memorial, allowing them to effectively experience the Memorial and physically become part of it.

Buxton Memorial

- 4.45 The Proposed Development's main aim, along with the intention to create a powerful and significant new Memorial, is to retain Victoria Tower Gardens, its uses, its visual connections and to respect and add to the existing memorials.
- 4.46 The proposal therefore considers it essential to maintain the position of the Buxton Memorial in its current location.
- 4.47 The Proposed Design is sensitive to the importance of maintaining the visual connection from the surrounding areas of the Gardens to the Buxton Memorial. The location of the memorial fins has been carefully designed so the visual connection from Dean Stanley Street to the Buxton Memorial is retained.
- 4.48 The Proposed Design provides the opportunity to create a benched seating area from which one can appreciate the form and appearance of the Buxton Memorial. The Holocaust Memorial and Learning Centre also introduces the potential for increased interest in the Buxton Memorial and other memorials from those visiting Victoria Tower Gardens.

Horseferry Playground / Refreshments Kiosk / Spicer Memorial

- 4.49 The Proposed Development includes the retention of the Horseferry Playground and Spicer Memorial at the southern end of the Site. Both will be repositioned slightly further to the south of their current position.
- 4.50 Horseferry Playground will be redesigned making a more efficient use of the space, whilst simultaneously creating a more active play environment. The proposed new design takes inspiration from the existing play equipment and materiality and honours the playground's history, retaining a sandpit as the central element.
- 4.51 A new and improved refreshments kiosk, located at the southernmost end of the playground, is proposed to replace the existing kiosk. A covered seating area associated with the

refreshments kiosk is included as a break-out space for parents and children, where parents can watch their children.

4.52 The positioning of the new refreshments kiosk, close to the existing retained public toilets and Royal Parks office and storage areas, makes a more efficient use of this end of the Site whilst the refreshments kiosk and seating area create a friendly and social atmosphere at this end of the Site.

Landscaping and Public Realm

4.53 As set out in detail within the Design and Access Statement, landscaping forms an integral component of the Proposed Development. The UK Holocaust Memorial and Learning Centre has been conceived as a single concept, intrinsically linked to the surrounding context of Victoria Tower Gardens. The proposal considers the Memorial and landscape as one element, moving up and over the fins, around and down through the Courtyard. Whilst the Proposed Development modifies the existing Victoria Tower Gardens, their design gives back a new experience for visitors to the Gardens.

4.54 The form of the landscape responds to the character and features of Victoria Tower Gardens, respecting key views in and out of the Site and supporting current activities of local residents and users of the Gardens.

4.55 The Proposed Development within Victoria Tower Gardens is designed with the greatest sensitivity to the existing context and character of the area. The design team have developed a strategy that integrates the Proposed Development into the Gardens, creating a new landscape that allows all users to experience it.

4.56 The Proposed Development will provide the following significant enhancements to Victoria Tower Gardens:

- The grassed open space within the Site will be re-laid with significantly improved drainage with significant shrub and flower planting around the Gardens;

- Pathways throughout the Gardens will be regraded and made more permeable to improve soil conditions for trees and accessibility requirements.
- Landscaping and seating will be added around Buxton Memorial to improve the setting, viewing experience and accessibility to the memorial itself. The Applicant has aspirations to reconnect the existing water fountain, which will be submitted under a separate listed building consent application.
- Raised walkway and new seating along the River Thames embankment, which are separate from the main circulation route will improve visibility of the river.
- Horseferry Playground will be repositioned and enhanced, providing sand and waterplay, climbing, swinging, sliding, balancing, sensory and role play. The existing refreshments kiosk will be replaced with a new modern kiosk which provides a covered seating area.

Transport

Servicing

- 4.57 An on-site servicing bay is proposed for deliveries to the Memorial. The bay can accommodate a van for typical deliveries. These servicing vehicles would also access the site outside of opening hours, and enter and exit in forward gear.
- 4.58 It is also proposed to provide a short 7m on-street servicing bay, which will require the reconfiguration of the highway layout and traffic markings along the eastern side of Millbank. The proposed servicing bay would be operational between 10:00-16:00 and between 19:00-07:00. It would be governed by a 'loading / unloading only' restriction.
- 4.59 Due to trolleying distance requirements, waste will be collected by a private contractor. Refuse from the individual uses (learning centre, refreshments kiosk, entrance pavilion) will be kept in a single bin store alongside the servicing bay. Refuse collection will take place outside of the opening hours of the Gardens and Memorial and Learning Centre.

Coach Drop-off / Pick-up

- 4.60 It is proposed to provide a 30m coach drop-off / pickup bay on the eastern kerbside of Millbank, immediately south of the zebra crossing alongside Dean Stanley Street. The coach bay would be accommodated by relocating the bus cage for stops NA and NB to the southern end of this section of kerbside.
- 4.61 Between 10:00 and 16:00 the coach bay would be limited to coaches only, with no other vehicles permitted to load or unload. The coach bay would be governed by the 'loading / unloading' time restriction whereby coaches are only permitted to stop for the length of time required for passengers to board or alight.

Cycle Parking

- 4.62 It is proposed to provide 33 cycle parking spaces in the form of 17 Sheffield stands to be located on the western side of Millbank. There are already several sets of cycle stands along this pavement; it is proposed to extend the row north of Dean Stanley Street by ten stands (20 spaces), and to extend the row north of Horseferry Road roundabout by seven stands (14 spaces).

5.0 PLANNING POLICY FRAMEWORK

National Planning Policy Framework

- 5.1 National planning policy is set out in the form of the National Planning Policy Framework (NPPF), which was adopted on 24 July 2018. At the heart of the NPPF is the presumption in favour of sustainable development (Para 11), with three overarching objectives: economic, social and environmental. These are to be delivered through the preparation and implementation of plans and the application of policies within the Framework.
- 5.2 This means approving development proposals that accord with the development plan without delay and where the development plan is absent, silent or out of date, granting planning permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits of development, or specific policies in the NPPF indicate otherwise.

The Development Plan

- 5.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that when making any determination under the Planning Act it should be made in accordance with the development plan unless material considerations indicate otherwise.
- 5.4 In this instance, the Development Plan for the Site comprises the Consolidated London Plan (2016), Westminster's City Plan: Strategic Policies (March 2016), and the saved policies of the Unitary Development Plan (2007) (UDP).

5.5 Other relevant policy documents

- ICOMOS 'Guidance on Heritage Impact Assessments for Cultural World Heritage Properties' (2011)
- Mayor's 'London World Heritage Sites – Guidance on Settings' SPG (2012)
- The Palace of Westminster and Westminster Abbey including St Margaret's Church World Heritage Site Management Plan (2007)

- Westminster Abbey and Parliament Square Conservation Area Audit (June 2008);
- Statues and Monuments in Westminster SPD (2008); and
- Draft Planning Obligations SPD (August 2015).
- Development and Demolition in Conservation Areas SPG (April 1996);

Emerging Planning Policy

5.6 The Draft New London Plan was published for public consultation in December 2017. It is anticipated that the Plan will be adopted at the end of 2019. The Plan sets out the strategic economic, environmental, transport and social framework for London over the next 20-25 years. The Draft New London Plan is at an early stage of production and has not been subject to an independent examination. In accordance with the NPPF, little weight can be afforded to it at the current time although the Development is cognisant of the draft New London Plan requirements and has sought to respond to the emerging objectives where relevant.

5.7 The City of Westminster have recently published a draft New City Plan for consultation. Consultation on the draft New City Plan closes on 21 December 2018. Given the early stages of preparation of this document it not considered a material consideration.

Site Designations

5.8 Westminster City Council's City Plan Proposals Map identifies the Site as being located within the Westminster Abbey and Parliament Conservation Area, Thames Policy Area and on a Named Street within the Core Central Activity Zone (CAZ). The Site falls within a Flood Risk Zone 3 as classified by the Environment Agency.

6.0 PLANNING POLICY ASSESSMENT

6.1 This section assesses the Proposed Development against the Development Plan with regard to the following issues:

- Land Use
- Open Space
- Heritage, Design and Conservation
- Archaeology;
- Trees
- Transport
 - Car parking
 - Cycle parking
 - Coach drop-off / pick-up
 - Taxi drop-off / pick-up
 - Servicing and refuse
- Environmental Quality
 - Visitor Management Strategy
- Safety and Security
- Energy and Sustainability
- Flood Risk

Land Use

6.2 The proposed land uses for the Proposed Development can be summarised as follows:

Use	Proposed (GIA sqm)
Entrance Pavilion (Use Class D1)	95
Learning Centre (Use Class D1)	3,258
Refreshments Kiosk (Use Class A1)	41
Total	3,394

-
- 6.3 City Plan Policy S1 states that the Council will encourage development which promotes Westminster's World City functions, manages its heritage and environment and supports its living, working and visiting populations and Policy S34 notes that new social and community facilities will be encouraged throughout Westminster.
- 6.4 The Statues and Monuments in Westminster SPD identifies Westminster's monument saturation zone, where application for new statues and monument will not be permitted unless there is exceptionally good reason. Victoria Tower Gardens falls within the Whitehall and St James's saturation zone.
- 6.5 Victoria Tower Gardens is already home to memorials that celebrate the fight against slavery, inequality and injustice. A Holocaust Memorial is a perfect fit to this long established theme providing an exceptionally good reason why it should be located within the Gardens.
- 6.6 The Proposed Development will honour the victims of one of history's greatest tragedies, located beside one of humanity's oldest democracies. The Proposed Development will remind parliament that it has the power to oppress as well as the power to protect and remind all communities in the UK of the cost of indifference to intolerance and bigotry.
- 6.7 The Proposed Development will affirm the United Kingdom's commitment to standing up against prejudice and hatred, inspiring reflection and compassion and encouraging visitors to respect and embrace difference. Combining design, landscaping and placemaking to enhance Victoria Tower Gardens, improving the visual and sensory experience of the Gardens and giving it focus and civic presence, both for visitors and existing users.
- 6.8 UKHMF will work with other institutions across the UK supporting Holocaust commemoration and education. The permanent exhibition will be complemented with online material, drawing on the same research and sources, making links to other relevant sites, and promoting a deeper understanding of the Holocaust among as wide an audience as possible.

6.9 The Proposed Development will deliver a Memorial and Learning Centre of national and international significance, providing a world class facility for the community, while promoting Westminster's World City function in accordance with City Plan Policies S1 and S34.

Open Space

6.10 NPPF Paragraph 97 states that existing open space, sports and recreational buildings and land, including playing fields should not be built on unless:

- (a) An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- (b) The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- (c) The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

6.11 Adopted and emerging London Plan Policies 7.18 and G4 seek to protect open space, noting that the loss of protected open space must be resisted unless equivalent or better quality provision is made within the local catchment area.

6.12 City Plan Policy S35 and UDP Policies ENV14, ENV15 and DES12 seek to protect and enhance Westminster's open space network. Policy ENV15 states that planning permission will not be granted for development on, or under public or private open space of amenity, recreational or nature conservation value, unless the development is essential and ancillary to maintaining or enhancing the land as public open space.

6.13 The UK Holocaust Memorial and Learning Centre has been carefully designed with a small footprint within Victoria Tower Gardens, due to the underground nature of the building, which results in a small loss of open space resulting from the security pavilion and courtyard to the front of the memorial. However, the proposals will result in almost completely new Gardens being provided back to the community with the following significant improvements to Victoria

Tower Gardens provided by the Proposed Development that will deliver better quality open space and enhance the land as public open space:

- The grassed open space within the Site will be re-laid with significantly improved drainage together with significant shrub and flower planting around the Gardens.
- Landscaping over the Memorial and Learning Centre, creating a gentle slope with improved views of Parliament and the River Thames.
- Pathways throughout the Gardens will be regraded and made more permeable to improve soil conditions for trees and accessibility requirements.
- Landscaping and seating will be added around Buxton Memorial to improve the setting, viewing experience and accessibility to the memorial itself.
- Raised walkway and new seating along the River Thames embankment, which are separate from the main circulation route will improve visibility of the river.
- Horseferry Playground will be enhanced and updated, providing sand and waterplay, climbing, swinging, sliding, balancing, sensory and role play. The existing refreshments kiosk will be replaced with a new modern kiosk which provides a covered seating area.

6.14 The UK Holocaust Memorial and Learning Centre is a unique opportunity for a Memorial and Learning Centre that will benefit the cultural and educational enrichment of not only London but the whole of the United Kingdom providing a national landmark, of national and international significance, for current and future generations to reflect, remember and learn.

6.15 It is accepted that the proposals result in the loss of a small area of open space. However, the Proposed Development will provide almost completely new Gardens back to the community, enhance the land as public open space and deliver significant public benefits. It is therefore considered that the Proposed Development accords with national, regional and local planning policy.

-
- 6.16 If a different view is formed on the loss of open space, then the national and international significance of the Proposed Development would constitute material considerations which readily outweigh any perceived harm from this loss.

Heritage, Design and Conservation

- 6.17 Section 16 of the NPPF sets out how the historic environment should be conserved and enhanced, and makes it clear at para 193 that when considering the impact of a proposed development on a heritage asset (including its setting), local planning authorities should give 'great weight' to preserving the asset's significance. Any harm or loss should require clear and convincing justification and substantial harm or total loss should be exceptional. In the case of Grade II* or Grade I listed or registered assets or World Heritage Sites, substantial harm or loss should be wholly exceptional (paragraph 194). The policy also applies to non-designated heritage assets of archaeological interest which are demonstrably equivalent significance to scheduled monuments.
- 6.18 NPPF Paragraph 131 indicates that 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 with the overall form and layout of that surrounding.
- 6.19 Paragraph 196 of the NPPF states 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.
- 6.20 Paragraph 200 of the NPPF states that local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, 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 the asset (or which better reveal its significance) should be treated favorably.

-
- 6.21 The London Plan promotes development of the highest architectural quality. Policy 7.6 sets out the Mayor’s design guidance and requires developments to optimise the potential of sites and be designed in consideration of the local context including potential impact on listed buildings and conservation areas, providing a development that enhances the public realm, uses a palette of materials that complements the local architectural character, is inclusive and is flexible to allow for different activities.
- 6.22 London Plan Policy 7.8 advises that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural details.
- 6.23 London Plan Policy 7.10 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.
- 6.24 Draft New London Plan Policy HC1 states development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciate within their surroundings.
- 6.25 Draft New London Plan Policy D1 sets out the key characteristics that should be delivered through the design of London’s buildings and spaces in terms of their form and layout, quality and character, and the user experience they provide, whilst draft new London Plan Policy D2 will help ensure development delivers good design.
- 6.26 Strategic Policy S25 within the City Plan states that “*recognising Westminster’s wider historic environment, its extensive heritage assets will be conserved, including its listed buildings, conservation areas...their settings, and its archaeological heritage.*” Any change should not detract from the existing qualities of the environment.
- 6.27 Strategic Policy S26 relates to protected views within and across Westminster from intrusive or insensitive development. The supporting description notes that views “*enhance the*

enjoyment of the city and help to create a sense of local identity and distinctiveness. They include views of natural features, landmark buildings, open spaces, streets and squares.”

- 6.28 City Plan Policy S27 states *“uses of international and/or national importance, and the buildings that accommodate them will be protected and new international and nationally important uses encouraged within the CAZ and Opportunity Areas.”*
- 6.29 City Plan Policy S28 states *“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.”*
- 6.30 City Plan Policy S35 states in part that the Council will protect and enhance Westminster’s open space network by protecting all open spaces, and their quality, heritage and ecological value, tranquility and amenity.
- 6.31 Westminster UDP Policy DES1 seeks to ensure the highest quality in the form of new development in order to preserve or enhance the townscape of Westminster.
- 6.32 Westminster UDP 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.
- 6.33 Listed buildings and the setting of listed buildings are considered by UDP Policy DES10, which seeks to preserve both listed buildings and the setting of listed buildings.
- 6.34 Westminster UDP Policy DES12 relates to development affecting the appearance and integrity of open spaces and their settings.

Heritage

- 6.35 The Built Heritage, Townscape and Visual Impact Assessment by Montagu Evans describes the significant direct and indirect effects of the Proposed Development on built heritage, townscape and visual amenity. This assessment acknowledges that the strategic location of the Site provides a unique opportunity to consider Victoria Tower Gardens as a whole, respecting and complementing its surroundings. The history of the existing memorials will be complemented by integrating the United Kingdom Holocaust Memorial and Learning Centre, which will commemorate a crucial moment in history.
- 6.36 The Site is part of a wider urban and historic context, with physical proximities and visual connectivity to important historic and modern monuments, open spaces and key buildings such as Westminster Abbey, Parliament Square, River Thames and several others. The overarching vision for the United Kingdom Holocaust Memorial and Learning Centre is to retain Victoria Tower Gardens as public garden, affecting minimal green space. In response to the popularity and importance of Victoria Tower Gardens, the Proposed Development intervenes lightly, ensuring the Gardens' existing uses can be retained and enhanced rather than replaced.
- 6.37 The salient consideration 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 the designated heritage assets and their settings, the functioning and use of the space, and the visual amenity of those experiencing views of the Site.
- 6.38 In approaching the assessment of these impacts, it is noted that the scale of the proposals and the surrounding urban environment mean that the Proposed Development would only be experienced within a relatively contained area. Particular regard has been placed on the impact of the Proposed Development on the ability to appreciate the Outstanding Universal Value (OUV) of the Westminster World Heritage Site (WWHS). Whilst Victoria Tower Gardens and the Site are not located within the WWHS, the land is an important element in its setting, supporting its OUV.

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

- 6.39 In relation to the WWHS, the salient consideration is whether the Proposed Development would preserve or enhance the OUV of the of the WWHS situated to the north of the Gardens.
- 6.40 The intrinsic OUV of the WWHS 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 WWHS to the north.
- 6.41 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 nearby residents. Its character is affected by the activities found in the area and by the road traffic to the west and south.
- 6.42 The open character of the northern portion of the Gardens would be preserved, and the new softly sloping landscape creates an attractive feature when viewed from the WWHS, and from which visitors to the Gardens will be able to appreciate the form of Victoria Tower from a new, elevated perspective, creating an interesting new viewing position.
- 6.43 The function of the Proposed Development, 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 WWHS.
- 6.44 Whilst the Memorial and Entrance Pavilion will appear in some views from the south of Victoria Tower Gardens towards the WWHS, 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 Proposed Development have been designed to respond and remain subservient to the Houses of Parliament.

6.45 The intrinsic Outstanding Universal Value of the Westminster World Heritage Site will therefore be preserved as a result of the Proposed Development.

Victoria Tower Gardens

6.46 The intrinsic character of Victoria Tower Gardens is that of a green space within an urban setting, which accrues greater significance from its unique position adjacent to the WWHS. 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.

6.47 Victoria Tower Gardens has developed piecemeal over an extended period and the Proposed Development provides an opportunity to consider the space as a whole. The Proposed Development will create an attractive, high quality addition to the collection of memorials located within 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 Gardens, attracting new visitors and providing the opportunity for contemplation of both the new Memorial and the other memorials already located within Victoria Tower Gardens.

6.48 The Memorial will bring new visitors to Victoria Tower Gardens, 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 Place of Westminster from the landscaped slope above the Memorial and Learning Centre, which will reinforce the setting relationship between the Gardens and the World Heritage Site.

6.49 The Proposed Development is intended to have certain gravity and presence and so the design has a distinctive character. Whilst the proposals will change the character of the space within the Gardens, 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. Any harm caused to the character of the Gardens by the construction of the Memorial and Learning Centre would be limited and would have to be balanced against the benefits of the proposals.

6.50 The ability to appreciate the reasons for Victoria Tower Gardens' designation would remain, and its open character would not change. Therefore, any harm to the significance of Victoria Tower Gardens arising from the change in character of the land is considered to be at the lower end of less than substantial and outweighed by the public benefits arising from the Proposed Development in accordance with Paragraph 196 of the NPPF.

Westminster Abbey and Parliament Square Conservation Area

6.51 The character of the Conservation Area is derived from its range of historic buildings and spaces focused at the centre of Westminster; including both monumental, civic buildings of the Houses of Parliament and Westminster Abbey, and the quieter, semi-private areas around Dean's Yard and the cloisters.

6.52 The Proposed Development will be an attractive, high-quality addition to the existing memorials within 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 and the Buxton Memorial to the east.

6.53 The character of this part of the Conservation Area will not change and whilst the Proposed Development 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 Conservation Area.

Buxton Memorial

6.54 The Buxton Memorial commemorates the abolition of slavery, 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.

6.55 The Proposed Development seeks to create a landscape scheme around the Buxton Memorial, that 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 consider 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.

Townscape

6.56 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 recognized, and has been accepted as one of importance to the setting of adjacent character areas, including that of the Westminster World Heritage Site and Parliament Square to the north, which has a contrasting, highly urbanised character.

6.57 Overall, the creation of the Memorial and Learning Centre with associated hard and soft landscaping complements the use and functioning of the existing gardens. There will be greater vitality and activity, including more visitors to the Gardens, the impact of which will be mitigated through careful landscape and visitor management. The new landscaping will be an attractive feature which will be beneficial to visual amenity, and whilst the Memorial and Learning Centre will intensify the commemorative function of Victoria Tower Gardens, this is not a departure from its existing character.

6.58 The extensive visualisation analysis carried out within the Built Heritage, Townscape and Visual Impact Assessment, 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 resulting from the Proposed Development.

6.59 Due to the limited visibility towards the proposed Memorial, it is considered that the visual amenity of people experiencing LVMF views towards the Westminster World Heritage Site would be preserved.

Summary

6.60 In summary, the Proposed Development offers distinctive architecture of exceptionally high quality, which would be a positive addition to the Victoria Tower Gardens and deliver significant benefits in the form of a Holocaust Memorial and Learning Centre of national and international significance. Whilst the Memorial leads to some heritage and visual impacts, the Proposed Development is considered to be an entirely appropriate addition which responds sensitively to both its location and context and preserves the intrinsic Outstanding Universal Value of the Westminster World Heritage Site.

6.61 For these reasons, the Proposed Development is considered to accord with the heritage, design and conservation policies of the NPPF, London Plan, City Plan and UDP.

Archaeology

6.62 NPPF Paragraph 189 states where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

6.63 London Plan Policy 7.8 states new development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset.

6.64 Draft new London Plan Policy HC1 notes developments will be expected to avoid or minimize harm to significant archaeological assets. In some cases, remains can be incorporated into

and/or interpreted in new development. The physical asset should, where possible, be made available to the public on-site and opportunities taken to actively present the site's archaeology. Where the archaeological asset cannot be preserved or managed on-site, appropriate provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset, and must be undertaken by suitably-qualified individuals or organisations.

- 6.65 City Plan Policy CM28.1(A6) states that all applications for basement developments will safeguard significant archaeological deposits.
- 6.66 Archaeological survival is expected to be high within the Site, as it has not been developed since the early 20th century when the present gardens were laid out. A geophysical survey of the site has been carried out, which shows a north-south orientated feature, interpreted as a river wall, and additional features to the west. Through examination of historic mapping, it is likely that this "feature" is a projection based on the riverward extent of individual former wharf buildings that lined the water front from the 17th century until the late 19th century. There is likely to be a high potential for palaeoenvironmental remains contained within underlying alluvial sequences, which could give a complete environmental sequence for the entire Holocene. The Site was historically within the River Thames and River Tyburn and may have been used for riverine exploitation during these periods. Evidence of this activity would comprise timber jetties, trackways or boats contained within the alluvial deposits.
- 6.67 In light of the Site's potential for remains of up to high significance, consultation with Greater London Archaeological Advisory Service (GLASS), the City of Westminster's Archaeological Advisor, has been undertaken and an initial phased programme of archaeological works is under development. This will entail the creation of sub-surface deposit model from geoarchaeological boreholes, and targeted evaluation trenches within the area of the Proposed Development to greater understand the nature of archaeological remains. The results of these investigations will inform any further evaluation and mitigation strategy.
- 6.68 Such a mitigation strategy is likely to entail the full archaeological excavation of the area of below ground works, to ensure that all remains are removed, recorded and reported upon archaeologically. These works could also provide important opportunities for public

engagement events and outreach programmes. Any such works would be undertaken in accordance with a Written Scheme of Investigation (WSI).

6.69 It is therefore considered that the Proposed Development is in accordance with the NPPF, London Plan 7.8, City Plan Policy CM28.1 and draft London Plan HC1 in relation to archaeology.

Trees

6.70 NPPF Paragraph 175(c) states that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.

6.71 London Plan Policy 7.21 and draft London Plan policy G7 note that existing trees of value should be retained and any loss as a result of development should be replaced following the principle of ‘right place, right tree’.

6.72 City Plan Policy S.35 states that harm to trees through proposed development must be “...*firstly prevented, mitigated second, finally compensated*” and that the wider landscape must be “...*protected and enhanced with opportunity to extend and create...*”

6.73 UDP Policy ENV16 notes that all trees in conservation areas and all those trees subject to Tree Preservation Orders will be safeguarded unless dangerous to public safety or, in rare circumstances, when felling is required as part of a replanting programme. The Policy further states that planning permission will be refused for development likely to result in the loss or damage to a tree which makes a significant contribution to the ecology, character or appearance of the area.

6.74 As set out in the Arboricultural Impact Assessment (AIA) prepared by Bartlett Tree Expert Co., it is considered that the wider landscape has been protected as none of the London Plane trees are identified for removal, nor will the proposed development result in their demise

upon completion of tree health care programmes. The proposed landforms and improvements to the landscape and footpath network will also enhance Victoria Tower Gardens as a whole.

- 6.75 Harm to trees has been prevented through the various modifications of design throughout the design development process and technical solutions applied to the Proposed Development. Although root pruning may be considered harm, the AIA has demonstrated that this pruning is within tolerable levels, and provides a programme of compensation and mitigation, satisfying the requirements of Policy S35.
- 6.76 It has been demonstrated through discussions and research material that the root pruning will not cause any significant or lasting damage to the London Plane trees, and that they will recover from any associated physiological stress. The compensation and mitigation proposed as part of the Proposed Development will improve the soils and rooting environment in accordance with the requirements of UDP Policy ENV16.
- 6.77 The Proposed Development is of an inclusive design, which following the modifications of design, integrates into the existing treescape. The Proposed Development is considered to improve the quality of the landscape within Victoria Tower Gardens through the improvement to the soil and rooting environment, which will improve the health, longevity and appearance of the trees, as well as improve the hard landscape.
- 6.78 It is therefore considered that the Proposed Development meets the requirements of the NPPF and policies for trees in relation to the development and should be supported from an arboricultural perspective.

Transport

- 6.79 NPPF Section 9 outlines the requirements of development applications and provides details on what developments should do to minimise the impacts on the road networks. Section 9 further notes that Travel Plans should also be provided for all developments which generate significant amounts of movement.

6.80 The NPPF states that development should take opportunities to promote walking, cycling and public transport (see Paragraph 102).

6.81 The NPPF further indicates that developments should give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use.

6.82 The London Plan promotes development that will not adversely affect safety on the transport network, setting out the following requirements:

- Policy 6.9 seeks secure cycle parking in line with the standards set out in Table 6.3 of the London Plan;
- Policy 6.10 seeks high quality pedestrian environments; and
- Policy 6.13 states the maximum standards for car parking should be achieved as set out in Table 6.2 of the London Plan.

6.83 Draft London Plan Policy T4 states that development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity. Policy T6 sets out that car-free development should be the starting point for all development proposals.

6.84 City Plan Policy S41 requires all developments to prioritise pedestrian movement, whilst sustainable transport options will be supported. Particular priorities include:

- Providing adequate cycling facilities;
- Reducing reliance on private motor vehicles;
- Prioritising parking provisions for the disabled, car sharing and alternative fuel vehicles;
- Encouraging use of alternative sustainable fuels and technology; and
- Developing water based river transport where land provisions and biodiversity considerations allow.

-
- 6.85 UDP Policy TRANS6 notes that the council will introduce measures to control routes used by coaches and will seek improvements in coach facilities, such as coach parking, particularly off street and layover area.
- 6.86 The general aim of UDP Policies Trans 21-26 is to control and co-ordinate on-street and off-street parking to reduce the overall levels of parking while maintaining adequate availability of parking space for essential and priority users.
- 6.87 The Memorial is projected to be visited by up to one million people a year, most of whom will be existing pedestrians on the wide network given the Site's proximity to major trip attractors around Parliament Square.
- 6.88 The Site is highly accessible by public transport, with a Public Transport Accessibility Level (PTAL) of 6a, which equates to an excellent level of public transport access and is within close distance of bus and underground stations with services that provide various high frequency connections. The Site also has immediate access to established extensive footways and cycle route networks, allowing access to the wide ranging amenities and employment opportunities by foot and cycle.
- 6.89 A Transport Assessment prepared by WSP accompanies this application which has carried out an assessment of existing and proposed trip generation and potential impact on the highway network. The Transport Assessment concludes that the Site benefits from good levels of public transport accessibility, pedestrian provision and cycling provision and that the net proposed development trips generated by each mode of transport can be accommodated on the surrounding transport infrastructure. The Proposed Development is therefore considered to meet the transport objectives of national, regional and local planning policy in respect of sustainable development and would encourage the use of sustainable modes of transport.
- 6.90 National planning policy identifies that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. The Transport Assessment has not identified any severe transport impacts as a result of the

development and it can therefore be concluded that the proposed development should be considered acceptable in terms of highways and transportation.

Car Parking

- 6.91 Given the Site's excellent accessibility by public transport, it is proposed that no new car parking be provided for visitors or staff. It is considered that the demand for parking for blue badge holders visiting the Site can be accommodated by using existing blue badge parking bays within the vicinity of Victoria Tower Gardens.
- 6.92 Whilst the draft New London Plan does not provide specific standards for memorials, it does recommend "*all non-residential elements of a development should provide at least one on or off street disabled persons parking bay*". The nature of the development, combined with the proximity to high-profile locations including Westminster Abbey and the Houses of Parliament, makes it necessary to restrict vehicular access to the Site for security reasons. It is therefore proposed that no blue badge parking be provided on site. However, step-free public transport provision is good. Two bus routes operated by low-floor vehicles stop outside the Site, and Westminster station has step-free access. This will reduce the need for mobility impaired people to depend on private cars to be able to visit the Memorial and Learning Centre.
- 6.93 Additionally, blue badge holders are permitted to park within paid-for bays in Westminster, where they will be granted an extra hour free after initial payment during controlled hours. The closest paid-for bays are the eight bays on Dean Stanley Street, located only 50m from gate 3 of the Site.
- 6.94 Persons working in Westminster are eligible to apply for White Badge which allows them to park for free at any time in all residents' parking bays. There are also residents' bays on Dean Stanley Street which a disabled employee in possession of a white badge would be able to use.

Cycle Parking

- 6.95 As set out in the accompanying Transport Assessment prepared by WSP, on-site cycle parking will be provided for staff and visitors in accordance with UPD and draft New London Plan standards. As there are no specific standards for memorials, the London Plan ‘D1 Other’ parking standards are to be applied, requiring one space per eight staff plus one visitor space per 100sqm of floor area.
- 6.96 With a proposed development floorspace of 3,258 sqm, the parking requirements equates to 33 visitor cycle parking spaces. It is proposed that these will be provided on the western pavement on Millbank opposite the Memorial.
- 6.97 It is proposed to provide the 33 cycle parking spaces in the form of 17 Sheffield stands, located on the western side of Millbank. There are existing cycle stands along this pavement; it is proposed to extend the row north of Dean Stanley Street by ten stands (20 spaces), and to extend the row north of Horseferry Road roundabout by seven stands (14 spaces).
- 6.98 These locations are close to the pedestrian crossings leading to Victoria Tower Gardens gates 4 and 5 respectively, meaning that cycle parking will be located on the desired line between the Millbank cycle route and the Memorial and Learning Centre entrance at the south end of Victoria Tower Gardens.
- 6.99 It is estimated that there will be twenty members of staff working at the Memorial and Learning Centre. It is therefore proposed to provide four covered, secure staff parking spaces in close proximity to the loading bay on the western side of the Memorial and Learning Centre.
- 6.100 Cycle parking is therefore considered to be in accordance with regional and local planning policy.

Coach Drop-off

- 6.101 It is recognised that existing coach parking in the wider area is under high demand and as such the development proposals should reference wider coach parking strategy where possible.
- 6.102 It is proposed to provide a 30m coach drop-off / pick-up bay on the eastern kerbside of Millbank, immediately south of the zebra crossing alongside Dean Stanley Street. Currently this section of kerbside is in a bus lane (operating 07:00-19:00 Monday to Friday) with a single yellow line controlling waiting outside of the bus lane's hours of operations.
- 6.103 As set out in the accompanying Transport Assessment, the proposed coach bay will be accommodated by relocating the existing bus cage for stops NA and NB to the southern end of this section of kerbside.
- 6.104 The new coach bay will be 30m in length, sufficient to accommodate two coaches simultaneously. The bay would be governed by a 'loading only' restriction in order to prevent parking. Coaches would only be permitted to be stationary in the bay for as long as necessary to unload or load passengers.
- 6.105 Once coaches have dropped off their passengers opportunities for coach parking are provided on Horseferry road (three bays), Millbank South (five bays) and Albert Embankment North (nine bays). These parking locations will be communicated to operators and drivers in advance of their visit to the UKHMLC.

Taxi Drop-off / Pick-up

- 6.106 It is anticipated that existing taxi stands will be utilised as part of the Proposed Development and no additional taxi facilities are considered to be required.
- 6.107 There is an existing island taxi stand on Millbank in the centre of the carriageway between the Great Peter Street and Dean Stanley Street junctions. As set out in the accompanying Transport Assessment, it is not anticipated that the development proposals will affect the existing taxi

stand noting “*taxis can wait on this stand and once the Memorial [and Learning Centre] is operational, it is likely that the stand will be even better frequented by taxis due to the addition of a trip attractor.*”

Servicing and Refuse

- 6.108 As required under City Plan Policy S42, servicing within the scheme has been designed to ensure that there are no adverse impacts on the surrounding road network.
- 6.109 Policy TRANS20 of the UDP states that the Council require servicing to be located conveniently off street in order to minimize the impact on adjoining occupants.
- 6.110 The proposed servicing strategy seeks to reduce the need for on-street servicing, whilst also recognizing the security requirements commensurate with a scheme of this nature and location.
- 6.111 The Proposed Development includes a servicing bay within the Site boundary accessed through gate 3 outside of the Memorial and Learning Centre’s opening hours and outside of the bus lane’s operating hours.
- 6.112 Due to trolleying distance requirements, waste will be collected by a private contractor. Refuse from the individual uses (learning centre, refreshments kiosk, entrance pavilion) will be kept in a single bin store alongside the servicing bay. Refuse collection will take place outside of the opening hours of the Gardens and Memorial and Learning Centre.
- 6.113 The on-site servicing bay will also be used for deliveries to the Memorial. The bay can accommodate a van for typical deliveries. These servicing vehicles will also access the Site outside of opening hours.
- 6.114 It is also proposed to provide a 7m on-site servicing bay, which will require the reconfiguration of the highway layout and traffic markings along the eastern side of Millbank. Whilst servicing will take place on-site and outside of the Memorial’s operating hours whenever possible, some servicing will need to take place during the working day.

6.115 It is therefore considered that the proposed servicing arrangements are in accordance with City Plan and UDP policy.

Environmental Quality

6.116 UDP Policy ENV13 seeks to protect the amenity and environmental quality of the residential environment of an area through measures including the provision of open space, play space, associated community facilities, traffic management schemes and other appropriate measures including good landscape design and lighting.

6.117 City Plan Policy S29 identifies the Council will resist proposals that result in an unacceptable material loss of residential amenity, and requires developments to aim to improve the residential environment. Paragraph 5.22 of the City Plan goes on to identify it is likely new development will have some impact on residential amenity, but requests development takes measures which maintain or improve the amenity of neighbouring residents by addressing the issue of privacy and overlooking amongst others.

6.118 A Visitor Management Strategy accompanies the planning application and provides details on the steps taken by the Applicant in order to ensure that amenity and environmental quality of the surrounding area is protected.

Visitor Management Strategy

6.119 The Visitor Management Strategy sets out the guiding principles for the operation of the Holocaust Memorial and Learning Centre that will be managed by the UK Holocaust Memorial Ltd, an NDPB wholly owned by the Ministry of Housing Communities and Local Government (MHCLG), including the ticketing strategy and operational management plan.

Ticketing Strategy

6.120 It is proposed that visitor flows are controlled by timed ticketing strategy for entrance into the Learning Centre. This will require all visitors seeking to enter the Learning Centre to pre-book

in advance of their planned visit. It therefore will not be possible for visitors to acquire tickets to the Learning Centre on site.

- 6.121 Timed ticketing will control the maximum number of visitors arriving to the Site and is determined by the overall site capacity and the average dwell times. The optimal granularity can be set accordingly and it is proposed to adopt 30 minute timeslots for the Learning Centre.
- 6.122 It has been determined that encouraging visitors to the Learning Centre to pre-book tickets ahead of their visit is the best option as it offers significant benefits to both visitors and the operators of the Holocaust Memorial and Learning Centre. For the visitor it guarantees their preferred visit date and timeslot, allowing immediate entry upon arrival. For the UK Holocaust Memorial and Learning Centre advanced ticket booking provides forward insight into how many visitors are expected in each of the coming days and at what times.
- 6.123 Online booking is the preferred channel for people planning to visit the Learning Centre in advance. The visitor will choose the date and time they wish to visit, select the number of ticket types and then proceed to the checkout screen. Most sales and admissions systems will email tickets, or allow the visitor to download their entry ticket(s) directly from the website during the booking process. Each ticket contains a unique barcode that can be used only once that confirms the visitors' arrival on the correct day and at the correct time. Clear instructions will direct the visitor to print the e-ticket, or to have their e-ticket available for scanning from their phone or tablet on arrival in order to gain entry.
- 6.124 Members of the public with mobile phones can purchase tickets themselves in advance or on the day via the online booking engine which will be part of the main website. This process could be encouraged through publicity and marketing material located in and around the Westminster areas and instigated by visiting a simple URL or by scanning a QR code with their mobile phone.
- 6.125 For visitors wanting to guarantee their place who have no access to the public internet, a call centre facility will also be offered

- 6.126 Education visits will be pre-booked with UK Holocaust Memorial Ltd directly. These visitors will most likely arrive by coaches bringing parties of circa fifty people at a time. For these groups the party leader will be issued with a single admission ticket that will allow all members to enter all together.
- 6.127 With a maximum of 375 people entering the Learning Centre in one hour, it will be possible to cope with the expected demand using the entry procedures in place within the Entrance Pavilion.
- 6.128 Using handheld scanners offers a great deal of flexibility and provides a friendlier, more welcoming interaction for visitors. Members of staff standing at the narrowest point at the Entrance Pavilion will scan visitors' tickets when entering the building to confirm they are valid. In many circumstances checks are simple and individuals can be cleared quickly. For school groups it may be possible to do a collective check where the entire group can be pushed through in just a couple of minutes.
- 6.129 Schools and larger groups will most likely arrive on coaches. After disembarking they will normally be held outside the Entrance Pavilion in a briefing area to allow numbers to be confirmed prior to entry. A single ticket can be used to admit the entire group as a whole to speed admission further. With the timed ticket model in place the number of individual visitors waiting to enter at this time will also be significantly reduced as a result, so even with the arrival of a large group the impact on the entrance is kept to a minimum.
- 6.130 The constants for the building capacity and the possible throughput, combined with industry trends illustrate that even with high demand, small party sizes, which take longer to process, and at the busiest times during the day, it is possible to comfortably manage the UK Holocaust Memorial and Learning Centre entrance, keep queue lengths to a minimum, and in the majority of cases with no queues forming at all.

Operational Management Plan

- 6.131 UK Holocaust Memorial Ltd will be responsible for maintaining all aspects of the premises, from front of house, security, staffing and maintenance of the building and external hard landscaping.
- 6.132 The Memorial and Learning Centre's opening hours will largely be in accordance with the opening hours of Victoria Tower Gardens, which are dawn until dusk [9:30-17:30 7 days a week].
- 6.133 The building will be accessed out of Garden opening hours, by staff only, from the vehicle gate nearest the service entrance, the Dean Stanley Street gate.
- 6.134 The building will be opened each day by two members of security staff entering via the front door of the entrance pavilion, then opening up the rear doors of the entrance pavilion to gain access to the courtyard.
- 6.135 At the end of a day the building will be systematically checked to ensure nobody is left inside, secure doors to key areas will be locked, intruder alarms set, and security staff will do a final check of systems such as fire alarms, complete a status report, handover the building to remote monitoring, lock and leave building.
- 6.136 Victoria Tower Garden has five gates, from north to south. It is anticipated that the majority of visitors will enter the Gardens via the northern-most gate at Black Rod's Garden, where the statue of Emmeline Pankhurst is located. They will reach the Memorial and Learning Centre via the sweeping curved path to be formed within the landscaping.
- 6.137 Visitors will arrive at the Entrance Pavilion to the Memorial and access it via a door on the southern side, entering a small portico, then turning to their left into the reception space where screening takes place prior to entering the courtyard.

-
- 6.138 On leaving the Memorial, visitors will exit via doors in the west perimeter wall of the courtyard, immediately before the Entrance Pavilion. They will not be required to pass back through the pavilion itself. Visitors who have left large bags will then be able to collect them, by returning their bag tag and receiving their deposit.
- 6.139 As visitors leave via the west façade it is anticipated that they will leave the Memorial via the path closest to Millbank, or by leaving the Gardens via the gate on to Millbank, thereby reducing the likelihood and impact of visitors arriving and leaving the Memorial via the same route.
- 6.140 It is estimated that there will be approximately 20 staff based on site, which include front of house / visitor services and security staff, providing visitor reception, security screening and information.

Visitor Flow and Gardens Capacity

- 6.141 Detailed dynamic models have been developed by WSP to assess the entry arrangements for the expected visitor numbers to the UK Holocaust Memorial and Learning Centre. A dynamic model was also constructed to test the capacity of the Gardens itself as a result of unticketed visitors visiting to view but not enter. Static and dynamic modelling was also carried out to assess the Gardens' gates and entry points.
- 6.142 The modelling undertaken demonstrates that with a predicted 3,000 visitors per day entering the Learning Centre and 7,000 additional visitors to Victoria Tower Gardens to view the Memorial but not enter the Learning Centre there are no issues with pedestrian flow or queuing at the entrance gates to the Gardens, the entrance to the Entrance Pavilion, or with the capacity of the Gardens in terms of crowding.
- 6.143 It is therefore considered that the Proposed Development accords with UDP Policy ENV13 City Plan Policy S29 through the visitor management measures that will be in place to ensure the amenity and environmental quality of the surrounding residential environment is protected.

Safety and Security

- 6.144 Paragraph 95 of the NPPF states in part that planning decisions should promote public safety and take into account wider security and defense requirements. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security.
- 6.145 Due to the location of the Proposed Development in central Westminster, security considerations are paramount in the design, providing protection to visitors of the Memorial and Learning Centre, and Gardens alike. The project team has consulted with security experts and the proposals will include Hostile Vehicle Mitigation Measures (HVM), which have been designed with careful consideration of impact on tree roots.
- 6.146 Counter-terrorism engagement has been undertaken by WSP Security with the Centre for the Protection of National Infrastructure (CPNI) to coordinate Hostile Vehicle Mitigation measures with other schemes being considered in the adjacent area. This will ensure that the scheme style being applied is appropriate for the location. The alignment will be along the perimeter of the gardens in order to most effectively protect people.
- 6.147 Entrance to the Memorial and Learning Centre is subject to a security searching and screening process, which visitors will be directed through on arrival. A bag drop and storage facility is provided within the Entrance Pavilion where visitors can securely store their bags while within the secure area of the Courtyard and Learning Centre.
- 6.148 Within Memorial and Learning Centre, security provision will be high, yet discreet and unobtrusive. The Entrance Pavilion will provide a location where large bags are stored and screening can be carried out. The external courtyard has perimeter planting / walling, which enables it to be a controlled space monitored by both natural surveillance and cameras. The Learning Centre will have a minimal number of cameras to cover the stairs but will also include an element of operational security by roaming stewards.

6.149 Visitors to Victoria Tower Gardens will be able to access the viewing hill via the defined path and at the viewing point will be a 1,100mm high barrier which is set back from the edge of the Courtyard to avoid articles from being dropped over the edge. A steward will be present at the viewing point to assist visitors as required. The steward will have communications with other members of the security and stewarding team, and their main role is to ensure the safety and security of visitors.

Flood Risk

6.150 Paragraph 155 of the NPPF states that inappropriate development in areas at a risk of flooding should be avoided by directing development away from areas at highest risk. Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flooding risk elsewhere.

6.151 NPPF Paragraph 157 states that all plans should apply a sequential, risk-based approach to the location of the development – taking into account the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property.

6.152 London Plan Policy 5.12 notes that development proposals must comply with the flood risk assessment and management requirements as set out in the NPPF and the associated technical Guidance on flood risk over the lifetime of the development. Developments which are required to pass the Exceptions Test set out in the NPPF and the Technical Guidance will need to address flood resilient design and emergency planning.

6.153 Draft New London Plan Policy SI12 states development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.

6.154 City Plan Policy S30 states in part that all development proposals should take flood risk into account and new development should reduce the risk of flooding.

-
- 6.155 City Plan Policy S45 notes that developments will ensure that flood-related infrastructure is protected and access for maintenance is retained.
- 6.156 A Flood Risk Assessment has been prepared by Atkins in support of this planning application and provides a quantitative assessment of the risks arising to the Site as a result of both its location and development proposals. The Site falls within the Environment Agency Flood Zone 3, however is heavily protected by the Thames River flood defenses, which will significantly reduce the risk of flooding on site. The Site is identified as being at low risk of surface water flood, with an annual probability of flooding between 1 in 1000 (0.1%) and 1 in 100 (1%) and flood depths below 300mm. The risk of flooding from sewers has also been identified as low.
- 6.157 The Drainage Strategy demonstrates that the site can accommodate surface water run-off during all events up to and including 100 year plus 40% climate change allowance.
- 6.158 Therefore, it is considered that the Proposed Development is in accordance with national, regional and local planning policy in relation to flood risk.

Sustainability and Energy

- 6.159 As noted previously, the NPPF establishes a presumption in favour of sustainable development. Paragraph 148 encourages proposals which support renewable and low carbon energy and associated infrastructure. Paragraph 153 states that, in determining planning applications, local planning authorities should expect new development to comply with any development plan policies on local requirements for decentralising energy supply unless it can be demonstrated that it is not feasible or viable; and take account of landform, layout, building orientation, massing and landscaping to minimize energy consumption.
- 6.160 The London Plan climate change policies set out in Chapter 5 collectively require developments to make the fullest contribution to the mitigation of, and adaptation to, climate change, and to minimise carbon dioxide emissions.

-
- 6.161 London Plan Policy 5.2 sets out an energy hierarchy (Be lean, Be clean, Be green) within which development proposals should seek to minimize carbon dioxide emissions. The Policy also sets a target for non-domestic buildings to achieve 40% improvement on 2010 Building Regulations.
- 6.162 London Plan Policy 5.3 states development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation. Major development proposals should also meet the minimum standards outline in the Mayor's supplementary planning guidance.
- 6.163 London Plan Policy 5.7 seeks to increase the proportion of energy generation from renewable sources, with major development proposals expected to provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation
- 6.164 At a local level, City Plan Policy CS28 seeks to achieve the highest standards of sustainable design and construction. Policy CS28 states that development must incorporate exemplary standards of sustainable design and will reduce energy use and emissions that contribute to climate change during the life-cycle of the development.
- 6.165 City Plan Policy S40 sets out that all major development throughout Westminster should maximise on-site renewable energy generation to achieve at least 20% reduction of carbon dioxide emissions, and where feasible, towards zero carbon emissions, except where the council considers that it is not appropriate or practicable due to the local historic environment, air quality and/or site constraints.
- 6.166 A detailed Energy and Sustainability Statement prepared by WSP accompanies the planning application. In accordance with London Plan Policy 5.3 and City Plan Policy CS28, the development proposes to Achieve BREEAM 'Excellent'. In general, the aim of the Proposed Development is to comply with the Mayor's sustainable design and construction SPD and local planning policy requirements.

6.167 In accordance with London Plan policy 5.2, the energy strategy for the development has been produced to follow the ‘be lean, be clean, be green’ principles of the energy hierarchy as follows:

- **Be lean:** A wide range of passive and energy efficiency measures are incorporated in the design, including good levels of thermal insulation, thermal labyrinth, displacement ventilation system, high efficiency lighting, underfloor cooling system and hydronic heating coils.
- **Be clean:** The design does not incorporate any combined heat and power (CHP) equipment or have connections to any district heat networks due site and location constraints. CHP equipment has been discounted as it requires flue/chimney which would be visible from within the Gardens and there is no district heat network branch within reach of the Site.
- **Be green:** A detailed assessment of renewable energy opportunities and viability has been undertaken, which has determined that open loop ground source heat pumps are a viable technology for integration into the scheme and are to be incorporated.

6.168 Measures that reduce the predicted CO₂ emissions from the Proposed Development have been considered and thoroughly assessed by the project team. All possible viable measures have been integrated into the proposed design and specifications resulting in a 17.2% improvement beyond the UK Building Regulations Part L2A.

7.0 PLANNING OBLIGATIONS

Planning Obligations

- 7.1 The Section 106 offer in respect of on-site and off-site environmental improvements has been prepared in the context of the Westminster City Council Planning Obligations SPG, the statutory tests in Regulation 122 of the Community Infrastructure Levy Regulations 2010 and the Planning Practice Guidance on Planning Obligations.
- 7.2 Under Policy 8.2 of the London Plan, “Planning obligations” boroughs should include appropriate strategic as well as local needs in their policies for planning obligations.
- 7.3 Policy 8.2 further states that boroughs, when negotiating planning obligations, should seek a contribution towards the full cost of provision that is fairly and reasonably related in scale and in kind to the proposed area and its impact on the wider area.
- 7.4 Policy S33 of the City Plan relates to planning obligations. It states that the City Council will require mitigation of the directly related impacts of development; ensure the development complies with policy requirements within the development plan; and, if appropriate, seek contributions for supporting infrastructure. Planning obligations will be sought at a level that ensures the overall delivery of appropriate development is not compromised.
- 7.5 The City Council’s Planning Obligations Supplementary Planning Guidance was adopted in January 2008. The document sets out the priorities for planning obligations and identifies the ways in which these can be applied in the case of individual development proposals.
- 7.6 In light of the above it is anticipated that the following s106 obligations would be required to mitigate the proposal:
- 7.7 For the Proposed Development, heads of terms are anticipated to cover the following:
- Highways works

- Public realm improvements
- Operational management plan
- Carbon offsetting
- Construction management plan.
- S106 monitoring

7.8 These Draft Heads of Terms are provided without prejudice.

Community Infrastructure Levy

Mayor's Community Infrastructure Levy

7.9 The Mayor of London's Community Infrastructure Levy (CIL) is a tariff chargeable by the GLA on new development following 1 April 2012. The Mayoral CIL is chargeable in Westminster at £50 per sqm (GIA). The Mayor consulted in 2017 on an updated Mayoral CIL charging schedule (MCIL2). These changes are currently planned to come into effect in April 2019. If planning permission is received after April 2019, then CIL will be calculated in accordance with MCIL2. For developments within Central London, the Mayor is proposing to charge £165 per sqm (GIA) for retail and £80 per sqm (GIA) for all other use classes.

Westminster's Community Infrastructure Levy

7.10 Both Mayoral CIL (charging rate: £50 / sq.m) and Borough CIL (£200 / sq.m (commercial)) is chargeable in Westminster on the creation of new floorspace over 100 sqm. The Site is also located within the Crossrail Central London Contribution Area as defined by the GLA Crossrail SPG (2016), which would require a contribution only on the retail element of the proposals. However, as the proposed retail floorspace is less than 500 sqm, a contribution towards Crossrail will not be required.

8.0 CONCLUSION

- 8.1 Section 38(6) of the Planning and Compulsory Purchase Act requires planning applications to be undertaken in accordance with the Development Plan unless material considerations indicate otherwise.
- 8.2 The United Kingdom Holocaust Memorial and Learning Centre is intended to have a profound effect on how British citizens and their political representatives, as well as overseas visitors, remember the Holocaust and learn lessons from it in confronting racism and conflict between communities. Its location in Victoria Tower Gardens, in the heart of Westminster, the historic, physical and symbolic centre of the state, will give the Memorial the prominence it deserves.
- 8.3 The United Kingdom Holocaust Memorial and Learning Centre is the UK's national establishment for remembrance of the Holocaust. It is dedicated to the six million Jewish men, women and children murdered in the Holocaust and all other victims of the Nazis and their collaborators.
- 8.4 The United Kingdom Holocaust Memorial and Learning Centre will stand as a reminder of the horrors of the past and will encourage reflection on their implications for British government and society, both at the time and subsequently. The view of Parliament from the Memorial will serve as a permanent reminder that political decisions have far-reaching consequences. By setting history's worst example of the disintegration of democratic values against the greatest emblem of Britain's aspirations for democracy, it will stand as a permanent reminder of the responsibilities of citizens in a democracy to be vigilant and responsive whenever and wherever those values are threatened.
- 8.5 This Planning Statement assesses the planning considerations associated with the proposed development against the provisions of the Development Plan and concludes that the proposed development accords with all national, regional and local planning policy delivering significant planning and public benefits including, but not limited to:

- Delivery of the United Kingdom Holocaust Memorial and Learning Centre that:
 - Combines a striking architectural monument with an engaging, reflective and powerful exhibition;
 - Aims to both remember and encourage reflection on the lessons of the past amongst all British citizens and visitors of all nationalities, reaffirming Britain's commitment to stand up against antisemitism, prejudice and hatred in all its forms; and
 - Will work with other institutions across the UK supporting Holocaust commemoration and education.

- A Memorial of distinctive and exceptionally high quality architecture which:
 - Would be a positive addition to the Victoria Tower Gardens;
 - Responds sensitively to both its location and context; and
 - Preserves the intrinsic Outstanding Universal Value of the Westminster World Heritage Site.

- Provides sensitive planting and landscaping that will enhance the visual and amenity value of the Gardens to create a peaceful place of calm and reflection for visitors, workers and local residents to enjoy.

- The grassed open space within the Gardens will be re-laid with significantly improved drainage with significant shrub and flower planting around the Gardens.

- Pathways throughout the Gardens will be regraded and made more permeable to improve soil conditions for trees and accessibility requirements.

- Landscaping and seating will be provided around Buxton Memorial to improve the setting, viewing experience and accessibility to the memorial itself.

- A raised walkway and new seating will be provided along the River Thames embankment, which are separate from the main circulation route and will improve visibility of the river.

- Horseferry Playground will be repositioned and enhanced, providing sand and waterplay, climbing, swinging, sliding, balancing, sensory and role play. The existing refreshments kiosk will be replaced with a new modern kiosk which provides a covered seating area.

8.6 If a different view is formed in this case, we consider that the national and international significance of the United Kingdom Holocaust Memorial and Learning Centre would constitute material considerations which would more than outweigh any alleged harm, and would be overwhelmingly in favour of the grant of planning permission.