

**United Kingdom Holocaust Memorial
and Learning Centre**

Environmental Statement (Volume 2)
Main Text - Revised Chapter 4 Alternatives
June 2020

The Secretary of State for Housing Communities and Local Government

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EIA Quality Mark

This Environmental Statement and the Environmental Impact Assessment (EIA) carried out to identify the significant environmental effects of the proposed development have been undertaken in line with our commitments as members of the EIA Quality Mark.

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4 Alternatives

4.1 Introduction

- 4.1.1 Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 states that an Environmental Statement must include “a description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects”.
- 4.1.2 This Revised Chapter 4 on Alternatives provides more detail on the alternatives sites considered in the Environmental Statement (ES) for the proposed United Kingdom Holocaust Memorial and Learning Centre (UKHMLC) also referred to here as the ‘Scheme’. The ES prepared on behalf of the Secretary of State for Housing, Communities and Local Government and accompanied the planning application document (Ref:19/00114/FULL) which was submitted to Westminster City Council on 7 December 2018 and formally validated by the Council on 7 January 2019.

4.2 Site selection

- 4.2.1 The Prime Minister’s Holocaust Commission Report (January 2015) identified three potential sites for the UK Holocaust Memorial and Learning Centre which included:
 - Potter’s Field, next to the Mayor of London’s office (165 Tower Bridge Rd, London SE1 3LW);
 - Millbank Tower (21-24 Millbank, London SW1P 4QP); and
 - Imperial War Museum (IWM) (Lambeth Rd, London SE1 6HZ).
- 4.2.2 The sites were identified as an indication of the type of location that would have some importance and resonance for the project.
- 4.2.3 Following discussions and appraisals, the UKHMF Board decided that none of these sites were suitable for reasons of availability and prominence and all three sites were discounted (see sections 4.3 to 4.5 below for more information).
- 4.2.4 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 Holocaust Memorial and Learning Centre. 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; and
 - Other agents.
- 4.2.5 In January 2016 twenty-four sites were identified by CBRE and considered by the UKHMF. However, a number of the sites identified in the site selection search were cost prohibitive; had poor visual importance; no emotional or political logic; and little or no outdoor space to provide a prominent memorial.
- 4.2.6 The three preferred sites identified by CBRE were:
 - Royal College of Obstetricians and Gynaecologists (RCOG) in Regent’s Park (27 Sussex Place, London NW1 4SP);
 - A part of the Knightsbridge Barracks ((20A Knightsbridge, London SW7 1SE); and
 - A part of Middlesex Hospital (Nassau St, Fitzrovia, London, W1W 7EY).

- 4.2.7 It was determined that none of the above referenced shortlisted sites were suitable mainly for reasons of availability and viability (see sections 4.3 to 4.5 below for more information).
- 4.2.8 In January 2016 following discussions involving the Government Property Unit, Victoria Tower Gardens (Millbank, Westminster, London SW1P 3JA) was identified 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:
 - It provides an iconic location adjoining Parliament, sitting along the riverfront immediately next to the House of Lords;
 - 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;
 - 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;
 - The resonance of being next to Parliament and on the timeless banks of the Thames is exceptional; and
 - 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.
- 4.2.9 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.”
- 4.2.10 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.”

4.3 Environmental appraisal of alternative sites

- 4.3.1 An appraisal of the six originally identified alternative sites (described above) and Victoria Tower Gardens, has been undertaken to demonstrate how the sites compare to each other against environmental, deliverability and visibility considerations. It provides a high level, desk top assessment of the sites against criteria which are most relevant to the site context and ability to deliver the Scheme:

Key Environmental Considerations:

- Biodiversity;
- Flood Risk;
- Air Quality;
- Archaeology;
- Built Heritage, Townscape and Visual;
- Traffic and Transport;
- Population and human health; and
- Ability of sites to accommodate expected number of visitors.

Visibility and profile:

- This is an important consideration for meeting the aims of the Scheme.

Land use and planning history:

- Existing land use;
- Planning history and redevelopment proposals;
- Site Allocations.

4.3.2 A summary of the key considerations relating to each site is provided against each criterion in Tables 4-1 to 4-3 below.

Table 4-1 - Key environmental considerations

Criteria	Victoria Tower Gardens	Millbank Tower	Imperial War Museum (IWM)	Potter's Field	The RCOG in Regent's Park	Knightsbridge Barracks	Middlesex Hospital
Biodiversity	The site is not within the boundary of any statutory or non-statutory designated ecological sites. Adjacent to important ecological features including The River Thames and Tidal Tributaries Site of Metropolitan Importance for Nature Conservation, various habitats within the gardens and commuting and foraging bats.	The site is not within the boundary of any statutory or non-statutory designated ecological sites.	Geraldine Mary Harmsworth Park, within which the IWM is located (owned and managed by London Borough of Southwark) is designated as Site of Importance for Nature Conservation (SINC). Various habitats to support protected species.	The site is not within the boundary of any statutory or non-statutory designated ecological sites. Adjacent to important ecological features including The River Thames and Tidal Tributaries Site of Metropolitan Importance for Nature Conservation, various habitats within the gardens.	The site is not within the boundary of any statutory or non-statutory designated ecological sites. The site is adjacent to Regents Park which has potential to contain habitats which support protected species.	The site is not within the boundary of any statutory or non-statutory designated ecological sites. The site is adjacent to Hyde Park which has the potential to contain habitats which support protected species.	The site is not within the boundary of any statutory or non-statutory designated ecological sites.
Flood Risk	The site is adjacent to the River Thames which is a main river. The gardens are within Flood Zone 3. However due to the extensive flood defences, flood risk is low.	The site is adjacent to the River Thames which is a main river. The site is within Flood Zone 3 (low flood risk as area benefitting from Flood Defences).	Flood Zone 3 but in an area benefitting from Flood Defences. Further away from River Thames than Millbank or Victoria Tower Gardens however, impact on flood risk likely to be the same.	The site is adjacent to the River Thames which is a main river. The site is within Flood Zone 3 but there is low flood risk as it is in an area benefitting from Flood Defences.	The site is within Flood Zone 1.	The site is within Flood Zone 1.	The site is within Flood Zone 1.
Air quality	The gardens are within Westminster's borough-wide Air Quality Management Area (AQMA). The main source of key air pollutants is from road traffic using Millbank and with minor contributions from traffic using Horseferry Road and Lambeth Bridge.	Within Westminster's borough-wide AQMA. Key pollutants similar to those for Victoria Tower Gardens.	London Borough of Southwark / Lambeth AQMA. The main source of key air pollutants is from road traffic using Lambeth Road, Kennington Road and A302.	The site is within Southwark AQMA. The main source of key air pollutants is from road traffic using A100/Tower Bridge Road, A200/Tooley Street with minor contributions from Weavers Lane.	The site is within Westminster's borough-wide AQMA. The main source of key air pollutants is from road traffic using A41/Park Road with minor contributions from Outer Circle.	The site is within Westminster's borough-wide AQMA. The main source of key air pollutants is from road traffic using A315/Knightsbridge and A4/Brompton Road with minor contributions from traffic using South Carriage Drive, Trevor street and Rutland Gardens.	The site is within Westminster's borough-wide AQMA. The main source of key air pollutants is from road traffic using A5204 with minor contributions from traffic using Riding House Street, Nassau Street and Cleveland Street.
Archaeological potential	Site lies within an area of archaeological priority meaning there is potential for archaeological remains to arise due to excavation of the new basement.	The site does not lie within an area of archaeological priority as defined by the LPA. Limited potential for archaeological remains.	The site lies within the Borough, Bermondsey and Rivers Archaeological Priority Zone. There is potential for archaeological remains to arise from excavation of the site.	The site lies within the London Bridge and Bermondsey Archaeological Priority Zone. There is potential for archaeological remains to arise from excavation of the site.	The site is adjacent to Regent's Park Archaeological Priority zone. Limited potential for archaeological remains.	The site lies within the Hyde Park and Kensington Archaeological Priority Zone. There is potential for archaeological remains to arise from excavation of the site.	The site is adjacent to Marylebone Archaeological Priority Zone. Limited potential for archaeological remains.
Built heritage, townscape and visual	The site is adjacent to The Palace of Westminster and Westminster Abbey including St Margaret's Church World Heritage Site. The site is adjacent to the Houses of Parliament and	Millbank Tower is a prominent building in the local townscape. It is a Grade II Listed Building located outside of a designated Conservation Area. Adjacent to the site is the River Thames and the	The Imperial War Museum is a Grade II Building. There are several Conservation Areas within the vicinity of the site including: <ul style="list-style-type: none"> West Square Conservation Area 	There are a number of listed buildings within the vicinity of the site including: <ul style="list-style-type: none"> Three Bollards (Grade II), South London College (Grade II) 	The site is adjacent to Regent Park, a Registered Park and Garden. There are several other Conservation Areas within the vicinity of the site including: <ul style="list-style-type: none"> Dorset Square Conservation Area 	The site is adjacent to Hyde Park, a Registered Park and Garden towards north of the site. There are a number of listed buildings in the vicinity of the site including:	The Middlesex Hospital Chapel is a Grade II* Building. There is one listed building, 10 Mortimer Street WI (Grade II) located within the vicinity of the site. There are number of listed buildings near to the site

Criteria	Victoria Tower Gardens	Millbank Tower	Imperial War Museum (IWM)	Potter's Field	The RCOG in Regent's Park	Knightsbridge Barracks	Middlesex Hospital
	<p>the Palace of Westminster, itself a Grade I Listed Building.</p> <p>Victoria Tower Gardens is a Grade II Registered Park and Garden.</p> <p>Buxton Memorial Fountain (Grade II*) is located within Victoria Tower Gardens.</p> <p>The Westminster Abbey and Parliament Square, adjacent to the site, is designated as a Conservation Area.</p>	<p>Millbank Millennium Pier. To the south of the site is the Grade II* listed Tate Britain, which lies within the Millbank Conservation Area. To the north on the other side of Thorney Street sits Thames House, which is also listed grade II and is within the Smith Square Conservation Area.</p>	<ul style="list-style-type: none"> Elliott's Row Conservation Area Two other conservation areas: Walcot and Lambeth Walk and China Walk, (located in LB Lambeth) <p>There are a number of listed buildings within the vicinity of the site including Charlotte Sharman School (Grade II).</p> <p>Within the site lies a Piece of Berlin Wall, Tibetan Peace Garden, World Garden.</p>	<ul style="list-style-type: none"> Bridge House Estate (Grade II) <p>The site is adjacent to Tooley Street Conservation Area.</p>	<ul style="list-style-type: none"> Lisson Grove Conservation Areas St John's Wood Conservation Area <p>There are a number of listed buildings in the vicinity of the site including:</p> <ul style="list-style-type: none"> Lampstandards in Front of Sussex Place (Grade II) Bollard at South End of Kent Passage (Grade II) The Windsor Castle Public House (Grade II) 	<ul style="list-style-type: none"> 235, 237 and 241 Knightsbridge SW7 (Grade II) Hill House (Grade II) Lamp Standard (Grade II) <p>The site is within Royal Park's Conservation Area. There are several other Conservation Areas within the vicinity of the site including:</p> <ul style="list-style-type: none"> Knightsbridge Green Conservation Area Albert Gate Conservation Area Knightsbridge Conservation Area Belgravia Conservation Area 	<p>including 20,23 and 26 Nassau Street W1 (Grade II).</p> <p>The site is within East Marylebone Conservation Area. There are several other Conservation Areas within the vicinity of the site including:</p> <ul style="list-style-type: none"> Charlotte Street Conservation Area Cleveland Street Conservation Area Hanway Street Conservation Area
Traffic and transport including Public Transport Accessibility Level (PTAL1)	<p>Victoria Tower Gardens has a well-established network of footways and formal and informal pedestrian crossing points and cycle accessibility is also well connected and maintained. The gardens have an 'excellent' level of access to public transport including underground stations, bus and river services. It has a PTAL score of 6a.</p>	<p>The site enjoys a 'good' level of accessibility by public transport including London underground stations bus and river services. It has a PTAL score of 5.</p>	<p>The site is within easy walking distance of Lambeth North and Waterloo Stations to the northwest, and Elephant and Castle Station to the east. Southwark and Kennington Underground Stations can be found further away to the north and south. A number of bus services operate along Kennington Road, Lambeth Road, and St George's Road. The site has a PTAL score of 6b.</p>	<p>The site is within easy walking distance from London Bridge Stations and London Bridge City Pier for river services to the northwest. Bermondsey Station can be found further away to the southeast. A number of bus services operate along Tooley Street and Tower Bridge Road. It has a PTAL score of 6a.</p>	<p>The site is within easy walking distance from Marylebone Stations to the south. Baker Street Underground Station can be found further to the southeast and Edgware Road Underground Station can be found further towards the southwest. A number of bus services operate along Park Road. It has a PTAL score of 6b.</p>	<p>The site is within easy walking distance from Knightsbridge Station to the east. Hyde Park Corner Underground Station can be found further to the northeast. A number of bus services operate along Knightsbridge and Brompton Road. It has a PTAL score of 6a.</p>	<p>Goodge Street Underground Station is located east of the site. Tottenham Court Road Underground Station can be found further away to the southeast. A number of bus services operate along Tottenham Court Road. It has a PTAL score of 6a.</p>
Population and human health	<p>Potential significant effect on pedestrian amenity experienced by existing park users because of the projected increase in footfall. The proposed development would result in a decrease in publicly accessible area of the gardens.</p>	<p>Anticipated number of visitors would not be compatible with current commercial use of the tower or proposed scheme of luxury flats. There would be limited space for visitors to congregate and move around.</p>	<p>Current use as a museum is considered compatible with a Holocaust Memorial. Limited impact on local amenities if visitors making combined trip with museum.</p>	<p>Current use as a public space and therefore suitable for Holocaust Memorial however, this would increase footfall and may impact negatively on existing users.</p>	<p>Current use as a private space isn't compatible with a Holocaust Memorial.</p>	<p>Current use not compatible with a Holocaust Memorial.</p>	<p>Current use may be compatible with Holocaust memorial as currently used by residents and office users, however, there may be limited space for visitors to congregate and move around.</p>

¹ A measure which rates locations by distance from frequent public transport services. PTAL 6b = best, 1= worst accessible by public transport.

Criteria	Victoria Tower Gardens	Millbank Tower	Imperial War Museum (IWM)	Potter's Field	The RCOG in Regent's Park	Knightsbridge Barracks	Middlesex Hospital
Ability of sites to accommodate number of visitors	The gardens are a public open space that attract many visitors and tourists each day. Space for coach drop off points.	Limited space for coach parking. Limited space within existing development and proposed scheme to accommodate anticipated number of visitors.	Potential effect on the IWM visitor experience because of the projected increase in footfall. However, visitors likely to make combined trip.	Site is already busy as a result of use by local offices and residents each day. During events, site experiences significant increase of users. Limited space for coach parking. Accessible on foot and by public transport.	Limited space within existing development to accommodate anticipated number of visitors. Limited space for coach parking but space for drop off points. Accessible on foot and by public transport.	Limited space within existing development to accommodate anticipated number of visitors. Space for coach parking. Accessible on foot and by public transport.	Limited space within existing development to accommodate anticipated number of visitors. No space for coach parking. Accessible on foot and by public transport.

Table 4-2 - Visibility and profile

Criteria	Victoria Tower Gardens	Millbank Tower	Imperial War Museum (IWM)	Potter's Field	The RCOG in Regent's Park	Knightsbridge Barracks	Middlesex Hospital
Visibility and profile	Site provides an iconic location adjoining Parliament and its World Heritage Site. Its relevance as a commemorative garden of Britain's national conscience and already containing significant memorial sculptures marking momentous historic events e.g. Buxton Memorial.	Current (office/commercial) use is considered incompatible with a Holocaust memorial. Potential to incorporate into proposed residential scheme, however this would provide limited visibility and profile for the memorial site.	The proposition offered was a memorial attached to a back wall with no prominence and a below-ground learning centre adjacent to it. The site lacks significance and the activities would be subsidiary to the far larger remit of the IWM, whose aims in remembering Britain at war which are not consistent with the aims of the HMLC.	Site is in a highly visible location as it is a public open space. Current use is compatible with a Holocaust Memorial.	Site would not be easily visible as it is to the rear of 27 Sussex Place.	Site is visible however not easily accessible due to current uses.	Current (mixed use office and residential) use is considered incompatible with a Holocaust memorial. Potential to incorporate into proposed residential scheme, however this would provide limited visibility and profile for the memorial site.

Table 4-3 - Land use and planning history

Criteria	Victoria Tower Gardens	Millbank Tower	Imperial War Museum (IWM)	Potter's Field	The RCOG in Regent's Park	Knightsbridge Barracks	Middlesex Hospital
Land ownership and existing land use	DCMS freehold (very small part owned freehold by Westminster City Council, over which DCMS holds a 999-year lease). Gardens and public open space	Private Office Use, occupational offices lease up to 2022	IWM / London Borough of Lambeth Museum	Southwark Council - managed by the Trustees of Potter's Fields Park. Gardens and open space, accessible to public.	London Business School. (Formerly used by RCOG) Venue/rooms now available for hire for conferences and events. Amenity/garden to the rear is linked to the building.	Household Cavalry Mounted Regiment is based at Knightsbridge/Hyde Park Barracks. Barracks still in use.	Site of former Middlesex Hospital now developed as Fitzroy Place used as mixed use residential, commercial space. Courtyard associated with Chapel is in use as publicly accessible space.
Site Allocation	The site is identified as public open space in the Westminster City Local Plan (2016). It is not located within an area of open space	Site is within an Employment Land allocation (Strategic Site F5) within the Local Plan and has planning permission for conversion to luxury flats plus arts/	The site is a museum within the Central Activities Zone (CAZ) and Elephant and Castle Opportunity Area. Within an area where cultural	Southwark Adopted policies map 2015 (updated 2016) designates the site as: Strategic Cultural Area, Protected Open Space and Metropolitan Open Land.	Not within a site allocation.	Westminster Policies Map 2016: Site within Knightsbridge Central Activities Zone. Site allocated as Proposals Site for change of use from barracks to residential,	Westminster Policies Map 2016: Site within Core Central Activities Zone and Areas of Open Space Deficiency.

Criteria	Victoria Tower Gardens	Millbank Tower	Imperial War Museum (IWM)	Potter's Field	The RCOG in Regent's Park	Knightsbridge Barracks	Middlesex Hospital
	deficiency according to the Council's open spaces and biodiversity strategy (March 2019).	cultural use in part of the tower.	uses are considered compatible with local policy.			including full on-site provision of affordable housing and the full range of housing sizes.	Part of the eastern section of the site lies within Protected Vistas (2A: Palace of Westminster from the summit of Parliament Hill). The southern boundary straddles with the boundary of Areas of Wildlife Deficiency.
Planning History	19/00114/FULL: UK Holocaust Memorial and Learning Centre (the subject of this Public Inquiry).	Planning Consent Application: 15/07756/FULL for conversion on Millbank Tower to luxury flats. Includes an arts/ cultural facility and 150 bedroom hotel. Since the approval in 2016, applications have been submitted in 2018 and 2019 to discharge conditions imposed. Amendments were approved in February 2020. This suggests the approved scheme is likely to be developed.	Planning permission for three-storey building to provide offices and staff accommodation ancillary to the Imperial War Museum within the rear yard, reconfiguration internally to create Holocaust Galleries.	08/09408/FULL Application for extension of the south wing of the college and associated external alterations.	03/01184/1884 Erection of temporary stabling and ancillary facilities north of Hyde Park Barracks adjacent to and on South Carriage Drive. 89/06853/1884 Application for new floor above existing block C, stable block, refurbishment of top floor and band accommodation. No objections to proposal. Decision granted in April 1990.	11/08831/FULL Full planning application for development of nine to 11 storey buildings plus two basement levels for mixed use purposes. Application permitted in 2011. Applications have been submitted between 2012 and 2017 to discharge planning conditions. This suggests the approved scheme is likely to be developed.	08/09408/FULL Application for extension of the south wing of the college and associated external alterations.

4.4 Summary

4.4.1 A summary of the key issues pertaining to each site is set out below:

Environmental considerations

Biodiversity

- Only the IWM site lies within a designated ecological site, however the museum is an existing developed site. The construction of the UKHMLC at Victoria Tower Gardens will cause a permanent small loss of open space. However, the habitat to be lost is amenity grassland, comprised of commonly occurring species and therefore does not provide much ecological value.
- With mitigation measures in place, there are unlikely to be significant biodiversity effects on any of the sites during construction and operation.

Flood Risk

- Victoria Tower Gardens, Millbank Tower, IWM and Potter's Field all lie within Flood Zone 3 but the risk of flooding from the river is reduced by the river flood defences for all sites. Development at all sites would have to be subject to a satisfactory Flood Risk Assessment approved by the Environment Agency. All other sites are within Flood Zone 1.
- The sites within Flood Zone 3 are at greater risk of flooding, however with the flood defence protection and mitigation measures in place, there are unlikely to be significant flood risk effects on any of the sites during construction and operation.

Air quality

- All sites are located within an AQMA. However, due to the level of public transport accessibility and very limited parking availability most visitors would visit the sites by public transport. Construction environmental measures imposed on any planning permission would ensure air quality is not significantly compromised during construction at all sites.

Archaeology

- Victoria Tower Gardens, IWM, Potter's Field and Knightsbridge Barracks are located within an area of archaeological potential/Archaeology Protection Zone. There would be a higher risk of potential adverse impacts at the four sites with archaeological designations, however with mitigation measures in place, there are unlikely to be significant archaeological effects on any of the sites during construction and operation.

Built heritage, townscape and visual

- Victoria Tower Gardens, Millbank Tower, IWM and Middlesex Hospital contain Listed Buildings/structures. Knightsbridge Barracks and Middlesex Hospital are located within Conservation Areas. Potter's Field and the RCOG are located adjacent to Conservation Areas and listed buildings which might suggest that development on these sites would have a lower risk of impact on built heritage assets. Victoria Tower Gardens is also a Grade II Registered Park and Garden and located adjacent to a World Heritage Site. It is, therefore, located in the most sensitive built heritage context.
- The creation of the UKHMLC will change the character and setting of some of the land and heritage assets in this area and the gardens will change from open lawn to a landscaped memorial in some areas. There will be an impact on a view across site however, the Scheme is considered to be an attractive, high quality addition to the collection of memorials currently located within the Gardens and careful scheme design will respond to the sensitivities of the heritage assets within the area.

Traffic and transport

- All sites are considered to have good public transport accessibility. Most visitors would visit the sites by public transport and effects of construction traffic would be minimised through a construction traffic management plan.

Population and human health

- Development at Victoria Tower Gardens and Potter's Field would affect the amenity of existing park users because of the projected increase in footfall and small decrease in publicly accessible area of the gardens. Development at Middlesex Hospital would affect the amenity of existing residents and office

users as there would be limited space for visitors to congregate and move around. The scale and nature of the proposed development and anticipated number of visitors would not be compatible with the redevelopment proposals for Millbank Tower. The RCOG and Knightsbridge Barracks sites are restricted to the public and it would have been difficult to manage the public/private interface and allow sufficient space for visitors without adversely affecting amenities of existing employees.

- There would be a low impact on local amenities around the IWM as it is already a cultural facility and it would be anticipated that visitors would make combined trips.

Ability to accommodate the number of visitors associated with the Memorial and Learning Centre

- Victoria Tower Gardens and Potter's Field are public open spaces which are used by visitors to the area and local residents. Millbank Tower is a tower block which currently accommodates commercial uses but has permission for luxury flats, there is provision for a cultural use within the redevelopment plans (south podium) but there would be limited space to accommodate the number of visitors anticipated. IWM is already a cultural facility and it would be anticipated that visitors would make combined trips minimising the need for additional coach space, however the only space offered was a back wall for the Memorial. Middlesex Hospital is in a heavily built up area just north of Oxford Street and west of Tottenham Court Road, which though well served would be extremely difficult for access via coaches or large numbers of visitors. The RCOG and Knightsbridge Barracks all have limited space within the existing site to accommodate the number of visitors anticipated.
- Victoria Tower Gardens and Potter's field have sufficient space to accommodate the Scheme. All sites have limited space for coach parking except for Victoria Tower Gardens, Knightsbridge Barracks and the IWM.

Visibility and profile

- Millbank Tower, The RCOG and Knightsbridge Barracks are commercial (or proposed residential) use and a memorial and learning centre within these sites would not be visible to the public. A cultural facility is proposed as part of the Millbank Tower development (within a podium) where there would be limited visibility and profile. The proposition offered to UKHMF by the IWM was a memorial attached to a back wall with no prominence and a below-ground learning centre adjacent to it. 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 which are not consistent with the aims of the Holocaust Memorial and Learning Centre.
- Potter's Field would provide a highly visible location for the UKHMLC. Victoria Tower Gardens provides a highly visible and iconic location adjoining Parliament and its World Heritage Site.

Land use and planning history

4.4.2 Of all the sites identified only Victoria Tower Gardens was available or not subject to redevelopment proposals:

- Potter's Field was part of a s106 agreement between the London Borough of Southwark and the developer to deliver a cultural use next to the Greater London Authority building as part of the residential development. The site was eventually sold to the new Bridge Theatre and was therefore no longer available for the Memorial and Learning Centre;
- Millbank Tower is privately owned and has planning consent for conversion to luxury flats. The permission indicates that the south podium will accommodate an arts/ cultural facility. Applications were submitted in 2018 and 2019 to discharge planning conditions and amendments to the permission were approved in February 2020. This suggests the approved scheme is likely to be developed;
- The IWM (Imperial War Museum) site was available, the proposition offered to UKHMF by the IWM was on land owned by London Borough of Lambeth;
- The RCOG in Regent's Park (27 Sussex Place) was cost prohibitive and has now been sold to its neighbour the London Business School to to expand its campus;
- Knightsbridge Barracks would have been dependent on the sale and redevelopment of the whole barracks which would not have been in UKHMF's control. It has permission for change of use to residential and applications to discharge conditions were submitted between 2012 and 2017, suggesting the approved scheme is likely to be developed;

- Middlesex Hospital has now been fully developed as Fitzroy Place, a commercial mixed use of 289 residential units and retail development.

4.5 Conclusion – Alternative sites

- 4.5.1 This high-level appraisal illustrates that the risk of potential environmental and traffic impacts from the Scheme on all sites is similar and considered to be low with appropriate mitigation during construction and operation of the Scheme.
- 4.5.2 Due to the proximity of Victoria Tower Gardens to significant heritage designations in the area, including a World Heritage Site, there is a higher risk of impact on the setting of these assets without careful design. The Scheme is considered to be an attractive, high quality addition to the collection of memorials currently located within the Gardens and careful scheme design will respond to the sensitivities of the heritage assets and views within the area.
- 4.5.3 Victoria Tower Gardens and Potter’s Field both have space to accommodate the Scheme, although the increased footfall would affect the experience of existing users. The IWM is already a cultural facility and it would be anticipated that visitors would make combined trips without affecting local amenities. However, the space offered by the IWM for the Memorial (attached to a back wall) was insufficient for the scale and nature of the Scheme. There is limited space within the other sites for a proposal of this nature.
- 4.5.4 In terms of availability: Potter’s Field and the RCOG were sold and are no longer available; Millbank Tower has permission for redevelopment and activity around discharging of conditions suggests this redevelopment is proceeding; Knightsbridge Barracks is subject to redevelopment proposals and Middlesex Hospital has been fully developed. Only the IWM site was available.
- 4.5.5 The IWM was not suitable as the Scheme would have limited space and prominence and would be subsumed into the wider aims and purpose of the IWM, which is not compatible with the aims of the Memorial. The site within Victoria Tower Gardens performs highly compared to all other sites in terms of visibility and prominence.
- 4.5.6 Victoria Tower Gardens had a similar level of risk to the other sites in relation to environmental and transport considerations but outperformed the other sites in relation to visibility and profile, availability and ability to accommodate the Scheme. The site has a more sensitive built heritage context, however it is these heritage assets and the relevance of the site, as a commemorative garden of Britain’s national conscience, which make this such an iconic location, well suited to a memorial of national significance. The alternative sites would not be able to offer the high visibility and profile which the Scheme demands.

4.6 Design alternatives

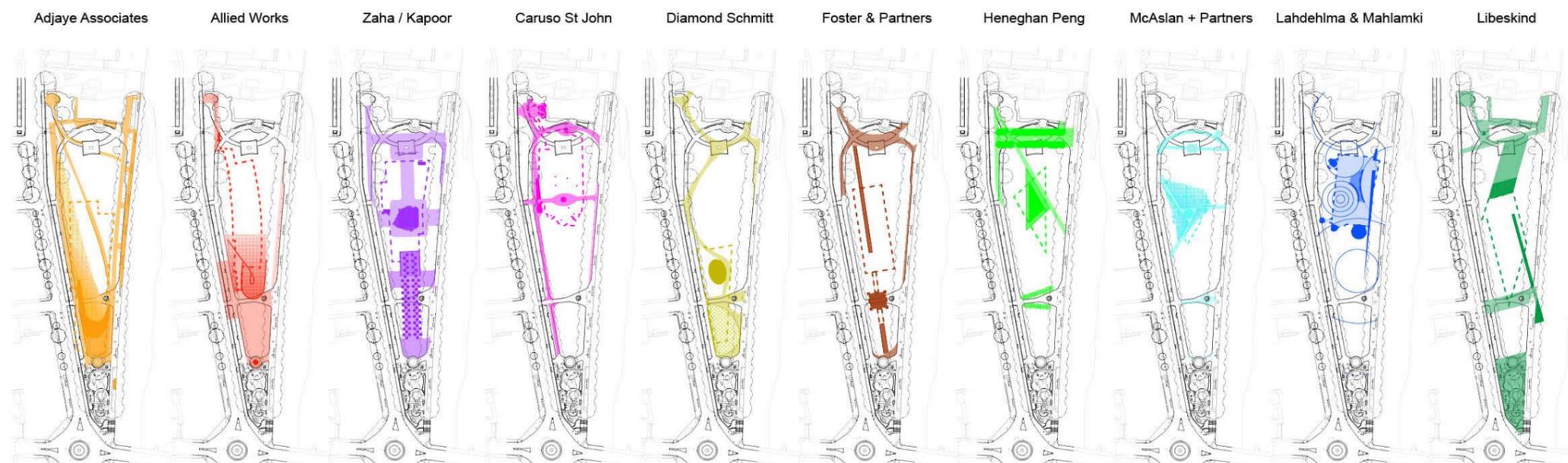
- 4.6.1 As described above in Chapter 1 of the ES, a competition was held to design the Memorial and Learning Centre in September 2016 with 92 entries in total. Ten shortlisted design proposals were displayed to the public in February 2017. These are illustrated in Appendix A.
- 4.6.2 The winning design, by Adjaye Associates, was announced in October 2017. The winning design reflected extensive research into the site and the objectives of the UKHMF in developing the Holocaust Memorial and Learning Centre.
- 4.6.3 The design has been developed to ensure the Memorial and Learning Centre fits within the current surroundings within the gardens including:
- Not exceeding the height of the existing Buxton Memorial;
 - Not impacting on any existing trees;
 - Improving the landscape quality within the gardens while preserving the character of the existing use as public gardens to enhance the user experience; and
 - Improving views to the river.
- 4.6.4 Improvements to the initial design by Adjaye Associates and further development of the design informed by the environmental assessments included:
- Changes to the footprint and layout of the Memorial and Learning Centre to ensure the existing London Plane tree roots and their canopies are protected to ensure their long-term health;

- New pathways within the gardens to ensure connections around the gardens are not fragmented as they currently are;
 - Enhancing existing gardens furniture that has become degraded over time and considering the options to improve the ponding in the gardens during winter; and
 - Enhancing the existing playground.
- 4.6.5 Section 3 of the Design and Access Statement (included in the planning application in December 2018) illustrates how the design evolved.
- 4.6.6 Following submission of the planning application in December 2018, a review of the planning application proposals was undertaken and a number of design modifications to the Scheme were made. The amendments to the Scheme at this time included:
- Reduction in the overall perimeter of the proposed learning centre which includes change in shape of the northern and western walls;
 - Reduction in the footprint area of the learning centre by 213 m² with this area being added to the mezzanine level. The building footprint of the learning centre will still retain the current 3,258 m² area;
 - Reduction in materials required for excavation from approximately 30,000 m³ to 27,320 m³;
 - Changes to the design of the entrance pavilion to create a lighter, more transparent element which enhances and complements the existing gardens. This includes changes in height (reduced by 1 m) and area;
 - Redesign of the memorial courtyard to reflect the changes to the entrance pavilion;
 - Redesign and relocation of the skylight, approximately 13 m north; and
 - Internal developments to the exhibition space in the basement and mezzanine levels within the learning centre. These include extended mezzanine floor, stair and vertical lift access and ceiling and acoustic improvements.

Appendix A. Shortlisted Scheme comparison plans

Comparison Plans:

In order to demonstrate the different approaches to location within the site, and impact on Victoria Tower Gardens, below is a comparison of the plans of 10 short-listed schemes superimposed on the gardens. The dotted line shows the outline of the basement area, which also gives some indication of the extent of the site taken up during the construction phase.



Key:

-  New Underground Structure
-  Adjusted Path Edge
-  New Path
-  New Grass Slope
-  New Construction

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